

**Submission  
No 11**

**EXAMINATION OF AUDITOR-GENERAL'S PERFORMANCE AUDIT  
REPORTS FEBRUARY 2019 - JULY 2019**

**Organisation:** Randwick City Council

**Date Received:** 15 July 2020



Mr Greg Piper MP  
Chair of the Public Accounts Committee  
Public Accounts Committee  
Parliament of New South Wales  
Macquarie Street, Sydney NSW 2000

15 July 2020

**Ref No:** Email 26062020

Dear Mr Piper,

**Pre-lodgement and lodgement in Camden Council and Randwick Council – Response to Performance Audit Report Follow-up**

Please find attached Council's response for your consideration.

Regards,

Frank Ko  
Manager Development Assessment  
DA Department

## IMPLEMENTATION OF RECOMMENDATIONS

### Pre-lodgement and lodgement in Camden Council and Randwick Council

RECOMMENDATION		ACCEPTED OR REJECTED	ACTIONS TO BE TAKEN	DUE DATE	STATUS (completed, on track, delayed) and COMMENT	RESPONSIBILITY (Section of agency responsible for implementation)
1	Publish a development assessment policy or policies to assist applicants to better understand the Council's expectations and improve transparency	Rejected	<p>Council has developed a comprehensive Development Application (DA) Guide and also a Pre DA Guide, which detail the end to end process for development assessment, including pre-lodgement and lodgement stages. These guides are published on Council's website and are also available at our Customer Service Centre.</p> <p>The Pre DA Guide outlines the aims of the service to provide a better understanding of the DA process and notes the benefit of participating in a pre-lodgement meeting prior to the lodgement of any formal DA. The DA Guide sets a clear assessment framework and communicates Council's expectations to future applicants with regard to submission requirements.</p>	N/A	N/A	N/A

			<p>Whilst, the current guides have not been adopted by Council as a formal 'policy', the guides form part of Council's DA Procedures and are made available to all DA applicants or potential applicants.</p> <p>Therefore, moving this information into a policy adopted by the elected Council members may not provide any practical benefits given the extent of the information provided to guide the applicants. A formal policy would add also another layer of red tape and is considered to be unnecessary. In addition, it is in Council's opinion that a policy is a mandatory statement of the principles guiding Council's operations and decision making whereas guidelines are advisory and include explanatory statements and detail, context or recommendations for good practice. As such, the type of information and level of detail provided in the Pre DA and DA Guides are most suited to being included in a guideline rather than a policy.</p>			
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			<p>Incorporating such detail in a guide also allows for greater flexibility and prompt updating and amendment of details to address legislative or operational changes or improved practices.</p> <p>In conclusion, it is considered that Council's current Pre DA and DA Guides (together with the DA checklist and website content) provides clear information that assists applicants in understanding the DA process and Council's expectations and ensures transparency in our processes.</p>			
2	<p>Hold pre-lodgement meetings for as many complex proposals as possible, to increase the likelihood that development applications are 'assessment ready' when received, and:</p> <ul style="list-style-type: none"> <li>• make it easier for applicants to book meetings</li> <li>• do more to promote the benefits of meetings for applicants with complex projects</li> </ul>	Accepted	<p>Whilst Council cannot force potential applicants to participate in a pre-lodgement meeting, Council is committed to encouraging pre-lodgement meetings for large and/or complex proposals.</p> <p>Council is currently considering ways to:</p> <ul style="list-style-type: none"> <li>• further promote and encourage potential applicants to attend a prelodgement meeting.</li> <li>• expedite the pre-lodgement process without compromising the quality of advice provided.</li> </ul>	N/A	On track	Council

	<ul style="list-style-type: none"> <li>hold meetings sooner after requested by applicants and more quickly communicate outcomes to applicants.</li> </ul>		<ul style="list-style-type: none"> <li>use pre-lodgement statistics to promote the value of having a pre-lodgement meeting (refer to item 3 below).</li> </ul>			
3	Improve monitoring of the pre-lodgement and lodgement stages, including analysing the effect of pre-lodgement meetings on assessment readiness of applications, once enough have occurred to allow a valid analysis.	Accepted	Council to analyse the effectiveness of pre-lodgement meetings to ensure this process does improve the quality of application, and thereby reduce assessment times.	N/A	On track	Council
4	Improve their development assessment data quality assurance practices.	Accepted	<p>Council will seek to further improve development assessment data quality assurance practices by:</p> <ul style="list-style-type: none"> <li>seeking clarification from the Department of Planning and Environment on required statistics;</li> <li>preparing clear specifications for the preparation of development assessment statistics; and</li> </ul>	1 Jan 2021	On track and will be implemented in full from 1 Jan 2021 via Planning Portal	Council and DPIE

			<ul style="list-style-type: none"><li>• ensuring that all statistics are reviewed by senior management prior to finalisation.</li></ul>			
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