

**Submission  
No 12**

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

**Organisation:** Camden Council

**Date Received:** 15 July 2020



14 July 2020

Mr Greg Piper MP  
Public Accounts Committee  
Parliament of NSW  
Macquarie Street  
SYDNEY NSW 2000

Dear Mr Piper,

**Re: Auditor General's Performance Audit Report – Pre-lodgement and lodgement in Camden and Randwick Council**

I refer to your letter dated 26 June 2020 requesting Council provide the Committee with a submission outlining the council's response to the Auditor General's report *Pre-lodgement and lodgement in Camden Council and Randwick Council*, tabled on 20 June 2019.

Please find attached Council's comments in this regard using the template provided. You will note from the attached table that Council has actioned all of the recommendations made in the performance audit.

Camden Council recognises the valuable work of the Audit Office and welcomed the findings of this audit.

If further information is required, please contact [REDACTED]

Yours sincerely

[REDACTED]  
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GENERAL MANAGER



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## 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 to assist applicants to better understand Council's expectations and improve transparency.	Accepted	Nil	31/12/19	Completed – Camden Council has developed and published a Development Assessment Policy that clearly outlines Council's expectations and improves transparency. The Policy is available for viewing on Council's website at: <a href="https://www.camden.nsw.gov.au/assets/pdfs/Development/Preparing-a-DA/Development-Assessment-Policy.pdf">https://www.camden.nsw.gov.au/assets/pdfs/Development/Preparing-a-DA/Development-Assessment-Policy.pdf</a>	Statutory Planning
2	Hold pre-lodgement meetings for as many complex proposals as possible, to increase the likelihood that development applications are 'assessment ready' when received, and: 1. make it easier for applicants to book meetings 2. do more to promote the benefits of meetings for applicants with complex projects 3. hold meetings sooner after requested by applicants and more	Accepted	Nil	31/12/19	Completed – Key Performance Indicators have been established for the processing of Pre-DA's, with Pre-DA meetings arranged within 14 days of the lodgement of the application and written advice issued within 14 days of the meeting. These timeframes are tracked and reported in Council's Property and Rating System (Authority).  As noted above, Council has developed and published a Development Assessment Policy that strongly encourages Pre-DAs for the following types of applications: <ul style="list-style-type: none"> <li>• DAs proposing large subdivisions, residential flat buildings, multi-dwelling housing, significant commercial developments including shopping centres and complex industrial developments,</li> <li>• DAs that will be determined by the SWCPP,</li> <li>• DAs with a capital investment value greater than \$2 million,</li> <li>• Complex proposals including those with environmentally constrained sites, and</li> <li>• DAs that will involve significant LEP or DCP variations.</li> </ul>	Statutory Planning

	quickly communicate outcomes to applicants.					
3	Improve monitoring of pre-lodgement and lodgement stages, including analysing the effects of pre-lodgement meetings on assessment readiness of applications, once enough have occurred to allow a valid analysis.	Accepted	Nil	30/06/20	<p>Completed - Pre-lodgement and lodgement timeframes are tracked and reported on in Authority.</p> <p>In terms of DA lodgements, the NSW Planning Portal provides improved monitoring of applications to ensure they are “assessment ready” when lodged. When Council receives an application via the NSW Planning Portal additional information can be requested from the applicant before the application is officially accepted and fees are paid. This ensures that all ‘accepted’ applications have sufficient documentation to allow for an informed assessment. With mandatory lodgement via the NSW Planning Portal commencing on 01/01/21, all DA’s will be subject to this initial detailed review to ensure they are “assessment ready” at lodgement.</p> <p>Options for analysing the effect of pre-lodgement meetings on the assessment readiness of DAs will take time given the lag effect of receiving the DA after the Pre-DA (public health / social distancing restrictions related to COVID 19 have also had an impact on Pre-DA numbers). Furthermore, given the various forms/types of development applications and the variables that can impact on assessment times (public submissions, external referrals, relevant determining authority etc) coupled with the fact the Pre-DA advice is only sought for a relatively small number of DA’s (less than 10%), any statistical analysis is considered to be of limited utility.</p>	Statutory Planning in association with Technology and Information Management
4	Improve development assessment data quality assurance practices.	Accepted	Nil	31/12/19	<p>Completed – Following the Performance Audit, Council engaged Civica to do a comprehensive a review of Council’s use of Authority (Council’s Property and Rating System) and produce a Health Check Report. The Health Check Report contained recommendations aimed at improving Council’s systems and approaches to DA retention, tracking and monitoring. Council staff have actioned the recommendations contained in that report. Procedures and practices have also been implemented to ensure improved development assessment data quality</p>	Statutory Planning in association with Technology and Information Management

					<p>and Crystal reports have been developed to provide improved oversight of data.</p> <p>While Council has developed improved procedures and practices in this regard, the mandatory lodgement of all planning applications via the NSW Planning Portal from 01/01/21 will greatly improve DA data quality. The NSW Planning Portal has highly developed auditing functions and will be fully integrated with Council's Property and Rating System (i.e. Authority) by the end of the year.</p>	
5	Evaluate the costs and benefits of a clearing house process for development applications that fall outside the fast track processing stream.	Accepted	Nil	31/12/19	<p>Completed –The cost and benefits of a clearing house have been evaluated. It was found that a clearing house would have benefits for the larger DA's such as large greenfield urban release area subdivisions; large residential flat buildings; medium density developments with more than 10 dwellings; developments in the Leppington and Leppington North precincts; and development within the Camden Town Centre (as well as any other developments as deemed appropriate by the team leader). Clearing House meetings are held every fortnight (the first meeting was on Wednesday 30 October 2019). The clearing house meetings are not held at time of lodgement but rather the meeting occurs a minimum of 5 days after referrals have been issued to the relevant referral officer to ensure sufficient time to review the documentation attached to the application to allow an informed discussion of the proposal.</p>	Statutory Planning
6	Improve systems and approaches for development application retention, tracking and monitoring.	Accepted	Nil	30/06/20	<p>Completed – As noted above, Civica conducted a review of Council's use of Authority (Council's Property and Rating System) and produced a Health Check Report. The Health Check Report made recommendations aimed at improving Council's systems and approaches to DA retention, tracking and monitoring. All of the recommendations in the Civica Health Check Report have been actioned by Council staff with the exception of the setting up 'Smart Fees' (which is an integrated fee system). The setting up of Smart Fees is to occur as part of an integration project that will achieve full integration between Council's Property and Rating System (i.e. Authority) and the NSW Planning Portal that will be completed in the second half of 2020.</p>	Statutory Planning in association with Technology and Information Management

					<p>Council has also developed a Crystal Report in Civica that provides monitoring information against the key timeliness indicators for development assessment (as outlined in Exhibit 8 of the Performance Audit Report) including median and mean gross assessment time; median and mean net assessment time; percentage of DA's determined within 40 days and 60 days; and percentage of applications returned to the applicant for further information.</p> <p>And finally, with the mandatory lodgement of planning applications via the NSW planning portal, DA retention, tracking and monitoring will occur via the Portal itself which has highly developed tracking, monitoring and auditing functions and will be fully integrated with Council's Property and Rating System (i.e. Authority) by the end of the year.</p>	
7	Work with the Department of Planning and Environment to increase the functionality of its online lodgement system and integrate it with other systems	Accepted	Nil, however complete integration with the Portal will occur in the second half of 2020 and Council will continue to work (indefinitely) with the DPIE to improve the functionality of the Portal.	N/A	<p>Completed - Council continues to proactively work with the Department of Planning, Industry and Environment (DPIE) to improve the functionality of its on-line lodgement system.</p> <p>Since joining the portal in December 2018, Council has expanded the types of applications that can be lodged via the Portal to include:</p> <ul style="list-style-type: none"> <li>• Development Applications</li> <li>• Modifications and reviews</li> <li>• Complying Development Certificates</li> <li>• Construction Certificates</li> <li>• Principal Certifier Appointments</li> <li>• Occupation Certificates</li> <li>• Subdivision Certificates</li> </ul> <p>Given the future / imminent mandatory lodgement, assessment and determination via the NSW Planning Portal, Council has initiated a project that will achieve full integration between Council's Property and Rating System (i.e. Authority) and the NSW Planning Portal to maximise the benefits of on-line lodgement for both Council and our customers. The project will be completed in the second half of 2020 and well before mandatory lodgement commences on 01/01/21.</p>	Statutory Planning in association with Technology and Information Management