



Operational & Efficiency (Service) Review

Development Assessment and Building Certification Division

DOCUMENT PROVENANCE	
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Council Resolution:	

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1. Executive Summary

The Development Assessment and Building Certification Division of Council is responsible for the provision of quality planning and development initiatives, processes, and services, including managing Council's development application (DA) assessment and building and plumbing certification services for the city. Council has requested a detailed Service Review is undertaken to ensure the long-term sustainable provision of these services in the most efficient manner.

The Service Review Plan identified 15 categories of services for review. These are delivered by the three groups within the Division: Development Assessment, Building Certification and Planning Administration. The Division manages a large quantum of work often in difficult circumstances – there is a nationwide shortage of labour, and applicants are often critical of Council's turnaround times. In Financial Year 23/24, the total number of applications lodged with the Division was 7,369 (an average of 28 each business day).

The Review undertook extensive consultation, benchmarking, and analysis of six 'in scope' areas:

- performance;
- timeframes;
- supporting systems, processes, procedures, and policies;
- division structure and salaries;
- support required to meet service levels; and
- additional current issues and opportunities.

When the Review findings and recommendations are agreed, a zero-based budget will be developed for the Division. Council also engaged the Review Lead to manage the Division for a period of up to six months. This innovative approach to a service review allowed operational improvements to be identified and trialled from Day One. Many recommendations are already piloted or well progressed.

Overall, the Review found that the Division's performance is well above average, and timeframes are better than many councils in NSW. For example, in FY 23/24 Council's average assessment timeframe for development applications was 78 days compared with an average of 115 days for all NSW councils. Having said that, the Review and the Division's staff acknowledge that averages do not always tell the whole story and there are examples where the Division's performance has not been acceptable to specific applicants and stakeholders. Staff are also often burned-out by their workloads and unable to find the time and resources for improvement initiatives.

A number of areas have been identified for improvement to ensure the long-term sustainable provision of planning and development services. The Review has resisted the temptation to provide a long list of recommendations expressed as goals or objectives. Instead, the Review and the Division's staff have worked to identify challenges and barriers to good decision making, improved customer experience and the timely provision of services, together with recommendations that articulate achievable change or projects to address these challenges. Focus areas for improvement include:

- quality of applications, particularly through the implementation of a 'front-end' concierge service and improved support for applicants;
- communication with stakeholders;
- reduced but redefined duty services;

- resources – active management, staff retention, long-term planning, and leadership of the Division;
- operational efficiency; and
- resources for outstanding projects that require completion to ensure compliance or best practice management of issues.

The Review team thanks those who took the time to share their experiences, data and suggestions with us. All staff in the Division are to be commended for engaging with the Review, advancing ideas and being open to change – their approach bodes well for effective implementation of the recommendations.

Finally, a word of warning about the data in this Review. The Review team has made every effort to check and correlate the data used to ensure it is accurate and we are comparing ‘like with like’ but it has not been the focus of our work. Data has been used as a guide only to findings and recommendations. Often the data did not point to a ‘right way’ to provide a service and we have relied on the experience of our team and stakeholders to both challenge and guide the Review. Every planning and development team and community is unique – the Review’s focus has been on quick, targeted, and sustainable change that will provide efficient and effective planning and development services for the city of Wagga Wagga well into the future. All stakeholders are encouraged to understand their role in this endeavour.

2. Service Review Brief

2.1 Objectives

The core objectives for Council in undertaking this Service Review are:

- Reviewing the structure, resources, and levels of service to determine if they are meeting Council and community expectations including alignment with Council’s strategic plans and assure stakeholders that its planning and development services work effectively.
- Continuing to move the organisational culture to a “can do” attitude and approach. By creating an expectation of best practice service delivery, Council is empowering its staff with the tools and processes to make better decisions and service improvements.
- Embedding the realisation of continuous improvement. In providing an environment where continuous improvement to service delivery is expected, staff are encouraged and supported to identify opportunities to make Council services the best value for its community.
- Identifying a clear set of recommendations on proposed changes following each service reviewed. These recommendations will include, as a minimum, consideration of options for efficient service delivery which may include costs, process, resourcing and delivery changes together with support for change management.
- Assisting to inform Councillors, the community and Council staff on what, how and why Council delivers the service. It endeavours to answer questions surrounding the need to provide the service, service delivery alternatives such as contracting resources, outsourcing some activities, joint delivery with other Councils, what can be provided at what cost and whether any efficiencies can be found.

2.2 Scope

The following services and matters are in scope:

- Performance of the Development Assessment and Building Certification Division with regards to current service levels, sector wide benchmarks and external trends.
- Timeframes for all services provided by the Division – including review and benchmarking where possible.
- Supporting systems, processes, procedures and policies together with ways of working, including any relevant dependencies.
- Analysis of any additional current issues and opportunities within the Division to meet the objectives of the Review.
- Division structure and employee salaries including benchmarking.
- Levels of support within the team or Council to meet the service levels agreed to be provided and expected by stakeholders.
- Once Review findings and recommendations are agreed, a Zero-Based Budgeting will be developed for the Division with the Finance Office.

The following services and matters are out of scope:

- Services provided by the Compliance Group which is currently reporting to the Director, Community and will be subject to a separate review with the Regulatory Group.
- Any services provided by other groups within Council (such as infrastructure contributions planning and administration) which are necessary inputs to the services provided by the Division. Any such dependencies will be noted but will not be reviewed in detail.
- Potential function or structural changes that are broader than the Development Assessment and Building Certification Division. This Review may assist any consideration of broader change across Council but is focused on this Division only.

2.3 Methodology and Evidence Base

This Service Review has been conducted in an innovative and agile manner, given the following circumstances:

- The Manager role within the Division was vacant, and the Review Lead was appointed for a period up to six months to both manage the Division and undertake the Review simultaneously.
- Several additional vacancies exist in the Division which has increased the workloads of existing employees creating stress in the Division and adding to delays in the provision of many services.
- It is difficult to attract and retain staff in the current labour market, particularly in regional locations and for those with planning, building and development expertise.
- A process review of the Division in 2011 (undertaken by SJB Planning) identified a number of areas for improvement and future focus, many of which remain challenges today. These related to four primary areas: culture, communication, consistency, and technology.
- There is significant research indicating that up to 70% of change programs fail to achieve their objectives (McKinsey 2021).

In consultation with Council's General Manager and Executive Team, the Review Lead approached the Review and management of the team with the aim of determining, implementing, and trialling changes from Day One rather than waiting until the Review was complete. The aim of this innovative and agile approach was to:

- Improve outcomes for stakeholders and provide more timely services as soon as possible.
- Find capacity within the Division for staff to contribute to the Review and participate in determining the future state of the Division.

- Embed a ‘masterful’ approach to drive successful long-term change by building capacity and frameworks for change with staff based on the principle of ‘trusting our team to solve issues’.

The Plan for the Review (Attachment A) outlined the following guiding principles and dependencies:

- While Service Reviews are primarily focused on customer and external stakeholders’ perspectives as the driver of how a service is to be provided, this Review acknowledges that people are key to the provision of the Division’s services and our employees’ views, ways of working and well-being are important. Further, the Division’s definition of ‘customer and external stakeholder’ should be articulated and includes a broad range of interests that may not be directly involved in any particular transaction.
- Recommendations should prioritise changes that ensure continued service delivery and can be made at minimum cost. Although the Review starts with ‘a blank page”, reworking what we already have is likely to facilitate outcomes more effectively than a complete overhaul of the Division.
- Recommendations should prioritise changes that are within Council’s control, taking into account external trends and factors such as the current tight labour market where possible.
- The Review should facilitate ‘quick wins’ and continuous improvement changes that can be undertaken at the same time as the Review progresses. This will assist staff to contribute to the Review, facilitate good change management and improve service delivery.
- Where the Division’s services are dependent on other service providers or external factors (for example, the NSW Planning Portal or Council’s Contributions Team), these will be noted for further investigation where appropriate.

Guided by the approach outlined above, the following methods were used to determine and ensure the long-term sustainable provision of services in the most efficient manner:

- Project initiation and governance, including a project team consisting of staff from the corporate support areas of Council and the Executive Team of Council acting as a steering committee.
- Research and information collection.
- Consultation with a range of internal and external stakeholders.
- Benchmarking and testing of ideas for reform including input from a consultancy with planning expertise (Planning Ingenuity).
- Implementing, trialling, and evaluating agreed changes, particularly to operational matters from Day One.
- Finalising recommendations and report.

3. Existing Services and Processes

Existing services and processes have been reviewed with a focus on the objectives set out in the Service Review Plan (Attachment A). Fifteen specific services (or ‘bundles’ of services) were identified and articulated in the Service Review Plan. A summary of each of these services is at Attachment B together with an updated Planning and Regulatory Services Customer Service Charter.

3.1 Current services are aligned with Council's strategic plans

The Division's Operational Business Plan dated December 2023 sets out the following principal activities, all of which align with Council's Community Strategic Plan and Delivery Program:

- Deliver high quality and informative customer service through the provision of clear, accessible and relevant information to the community – advice and information regarding development assessment and building certification related matters to industry and the community.
- Deliver inspection and monitoring programs to enhance public safety, manage risks and ensure compliance with relevant legislation – promote and encourage voluntary compliance with fire safety regulations through submission of Annual Fire Safety Schedules and through the Fire Safety Statement Program; undertake mandatory inspections of swimming pools as prescribed under legislation.
- Provide clear and consistent planning frameworks and processes that respect heritage and the distinct characters of urban villages – administer the Heritage Grants Program and coordination of the heritage advisor service.
- Assess and determine development against relevant state and local planning controls and their objectives to ensure consistent quality urban design outcomes for the natural and built environments.
- Monitor and manage contaminated sites – implement the Underground Petroleum Storage Systems Regulation 2019; manage the potentially contaminated land register; investigate relevant complaints and refer to NSW EPA.

3.2 Existing services are provided by three distinct groups within the Development Assessment and Building Certification Division which forms part of the Governance Directorate of Council

The Division currently comprises the following three groups:

- **Development Assessment** consisting of cadet and qualified town planners - responsible for assessing and determining development against relevant state and local planning controls and their objectives to ensure consistent quality outcomes for the natural and built environments.
- **Building Certification** consisting of cadet and qualified building surveyors - responsible for assessing and determining building and plumbing works against relevant legislation and codes including determining construction and complying development certificates, swimming pool compliance and fire safety.
- **Planning Administration** consisting of administrative staff with expertise in planning and building matters who provide significant technical and administrative support to the Development Assessment and Building Certification groups as well as holding primary responsibility for services such as section 10.7 planning certificates, drainage diagrams, contracts for Council to perform certification work and section 68 residential plumbing certificates.

The Division manages a large quantum of work. In FY23/24 the total number of applications lodged with the Division was 7,369 (an average of 28 each business day), comprising applications for:

- 595 development applications
- 277 construction certificates
- 66 complying development certificates

- 574 s68 approvals (sewer, drainage, heaters, caravan parks, etc)
- 180 building information certificates
- 1820 annual fire statements
- 3 bushfire certificates
- 223 swimming pool compliance certificates
- 1533 drainage diagrams, and
- 2098 s10.7 planning certificates.

These numbers do not reflect the additional work required by the Division to provide advice to applicants (often through duty services or pre-lodgment meetings), approval of consent conditions or advice to other directorates or state entities (for example, on infrastructure projects, liquor licensing applications, telecommunications developments, policy reform, state significant development or strategic planning issues).

The numbers of applications for all core services including development assessment, construction certificates and complying development certificates have reduced over the last three financial years – see Attachment C. This is consistent with trends across all councils in NSW and a lack of housing being delivered across the State (noting that use of private certifiers in Wagga Wagga has remained fairly stable). The number of budgeted Division staff has remained constant over that period although the trend over the three years has seen an increasing number of vacant roles due to an inability to recruit appropriate staff and long-term staff taking extended leave, a trend to engage more cadets and the introduction of the NSW Planning Portal which increased workloads.

Organisational charts showing existing Council directorates together with the Division are at Attachment D.

3.3 Legislative or best practice basis for most services

Existing services have been identified and grouped by categories for review. Given most services are required by legislation or best practice, there is little capacity for Council to stop providing any particular service. Therefore, the focus of the Review has been on how to provide the services efficiently and effectively and address any current risks.

3.4 The Compliance Group works closely with the Division and consideration is being given to the best organisational structure to support the work of the Compliance Group

The Compliance Group recently moved from the Division to work within the Community Directorate and is subject to a separate review of the Regulatory Group being undertaken by the Director, Community. Close to 80% of the work of the Compliance Group currently relates (appropriately) to building and development. However, there are opportunities to boost collaboration with and utilise capabilities in the Regulatory Group to improve the ways of working and services provided by the Compliance Group.

4. Summary of Findings

Existing services and processes have been reviewed with a focus on the objectives set out in the Service Review Plan (Attachment A). Fifteen specific services (or 'bundles' of services) were identified and articulated in the Service Review Plan. A summary of each of these services is at Attachment B together with an updated Planning and Regulatory Services Customer Service Charter.

4.1 Performance of the Division with regards to current service levels, sector wide benchmarks and external trends

Overall, while performance can always be improved, the Review has found that over the Financial Years 21/22, 22/23 and 23/24, the Division's performance is well above the average of councils in NSW based on the quantum of work delivered with a high level of regulatory compliance given the number of staff employed. That said, the Review and the Division's staff acknowledge that averages do not always tell the whole story and there are examples where the Division's performance has not been acceptable to specific applicants and stakeholders. It is clear that the customer experience can be improved.

The Review has identified three externally facing areas of focus where targeted change should lead to improved performance and customer experience: clarity for applicants regarding the standard of information required to ensure applications are processed efficiently; improved communication with all stakeholders regarding the functions of the Division; and a redefined front counter/concierge information service.

4.2 Timeframes for all services provided by the Division

Given current resourcing and the quantum of applications received, the average timeframes for delivery of services by the Division can be considered good, with room to improve. This finding is supported by the new council league tables published by the Department of Planning, Housing and Infrastructure. These are based on gross timeframes and do not include 'stop the clock' days where Council is waiting on additional information.

With the exception of the Building Certification team, the Division does not currently effectively use regular monitoring or dashboard reporting to drive performance including timeframes.

4.3 Supporting systems, processes, procedures, and policies together with ways of working, including any relevant dependencies

Supported by work from consultants (Planning Ingenuity), the Review has found that the Division's underlying systems, processes and procedures are extensive and generally fit for purpose (there are some exceptions which are noted in the detailed findings). In particular, the Development Assessment and Building Certification groups are well supported by the Planning Administration group (which does not occur in many other councils).

There is however a view from staff within the Division that they are often 'reactive rather than proactive' in their ways of working and there is insufficient focus on continuous improvement and feeding 'lessons learnt' into improved processes.

4.4 Division structure and employee salaries including benchmarking

The Review's analysis of directorate and division structure in other councils did not provide any guidance on 'best practice' except that strategic and statutory planning functions are generally grouped together.

The Review has focussed on ensuring that the Division is well set up and operating efficiently with a new Manager being recruited to lead the Division. The number of staff in the Division (about 30 FTE) does not justify the appointment of a new Director solely for the Division. However, executive leadership is important to performance.

In relation to the compliance function, the Review found that interactions between the Division and Compliance Group are generally documented and effective (with some exceptions noted in the detailed findings). These 'ways of working' should be monitored if the Compliance Group continues to sit in another Directorate.

Overall, the Review found that salaries are generally in line with other regional councils and benchmarking is done when roles are recruited, often with the assistance of external recruiters for senior roles. However, there is opportunity to review all workplace arrangements (particularly as recruitment is undertaken) and formalise workplace policies to ensure transparency and consistency of arrangements. This should improve work satisfaction which is usually driven by more than remuneration. Council should assess opportunities to recognise and reward the contributions of long-term staff.

4.5 Levels of support within the team or Council to meet the service levels agreed to be provided and expected by stakeholders

The Division works closely and well with Customer Service to provide many of its services. However, Customer Service's role in lodgment of applications is not effective as a quality check. In short, unsatisfactory applications should not be accepted by Council but applicants should be better supported regarding the quality of information required to ensure applications are assessed efficiently. The Division will need to work closely with Customer Service on the proposed concierge function particularly in relation to lodgment and resourcing.

There are several functions/services currently the responsibility of the Division that are not usually the responsibility of a statutory planning and building certification division. When plans and resources for these functions are determined, Council should consider where the functions are best placed noting that the Division's Planning Administration function is well placed to provide support regardless of where a function sits in the organisation. In summary, these are:

- Underground petroleum storage systems and management of potentially contaminated land (environment/regulatory function)
- Checking, issuing of, and maintaining data for section 10.7 planning certificates (strategic planning function)
- Updating of Development Control Plans (strategic planning function)
- Trade waste and some plumbing inspections (enviro health officer or infrastructure function)
- Road and locality naming and renaming (infrastructure or GIS function)

The Review has worked closely with each Group in the Division to assess both capability and capacity to deliver the services required, particularly given the inability to recruit experienced resources in the current labour market and noting historical and predicted workloads. In summary, the existing level of resourcing across the Group is 'about right' except for Development Assessment which has a 'missing middle' of qualified town planners. This should be addressed in conjunction with the resourcing requirements for a new concierge service, the new Manager and to address areas of risk (particularly contaminated land and DCP updates where resources required are currently uncertain). Workloads in the Division should also be monitored as recommendations are implemented.

4.6 Additional current issues and opportunities within the Division to meet the objectives of the Review

Culture and continuous improvement - the Review has found that staff in the Division are committed and technically competent. In the most recent past, resources have been focussed on delivery of core services and there has been limited time to proactively address issues or ensure

continuous improvement is undertaken. There are a number of risks or gaps that have been identified that require addressing to ensure compliance or best practice management of issues. The Division has begun developing and implementing plans to address these issues. This work will assist staff to be proactive rather than reactive in their ways of working.

Use of consultants/contractors – this is becoming increasingly difficult as availability decreases and costs increase. However, it is likely to remain essential to ensure peaks in workload and requirements for specific technical capability and accreditation can be addressed as required. Most organisations need to maintain some flexibility and mix of resources – Council is well practised in this regard.

Alternative models of service delivery – the Review recommends further time and resources are put to this issue, particularly investigating the establishment of a county council for planning and development services.

4.7 Financial considerations – Zero Based Budget including fees and charges

The average net cost of services for the Division for each of the previous three financial years was \$1.4million. Given the lack of consistency in council's directorates, it has not been possible to accurately benchmark net costs of service across other councils. In FY 23/24, the Division collected revenue of \$2,515,415 and total expenses were \$3,995,755.

Around 50% (by number and dollar value) of planning and development fees and charges are set out in legislation and Council has no discretion to change them. Council's fees and charges are generally easy to understand, invoice and pay (sliding scales are used less than in other councils). There are minimal opportunities to increase fees significantly and doing so may be a barrier to development and growth, however consideration should be given to charging for some services such as pre-lodgment meetings, information requiring significant research and for building information certificates following unauthorised work.

Most complaints received about fees and charges are generally combined with complaints about customer experience and the standard of services more generally. If applicants receive 'good service', they are generally happy to pay. This supports recommendations to improve communication and customer experience.

5. Summary of Recommendations

Existing services and processes have been reviewed with a focus on the objectives set out in the Service Review Plan (Attachment A). Fifteen specific services (or ‘bundles’ of services) were identified and articulated in the Service Review Plan. A summary of each of these services is at Attachment B together with an updated Planning and Regulatory Services Customer Service Charter.

ID	Recommendations
01	<p>Quality of Information Received:</p> <ul style="list-style-type: none"> Working with Customer Service and Communications, develop and trial a ‘front end’ concierge service covering lodgment of applications, better information and support to improve the quality of information received in applications and timeframes. Review and update where necessary Council’s website, forms, checklists and publicly available information to ensure a more user-friendly experience. Work with Council’s IT team on the Artificial Intelligence pilot program to assist with improving the pre-lodgment stage of the DA process.
02	<p>Communication with stakeholders:</p> <p>Clarify expectations for individual staff to improve the customer experience and work with Communications team to develop a communications plan which includes regular updates to applicants and industry using all channels available and face-to-face briefings.</p>
03	<p>Duty Services:</p> <p>Redefine planning and surveying duty services and reduce hours of service to either mornings or afternoons five days per week. Hours to be determined after further internal consultation, particularly with Customer Service, assessment of the new concierge service and development of a communications plan.</p>
04	<p>Accountability:</p> <ul style="list-style-type: none"> Implement regular monitoring and reporting of timeframes against Minister’s Statement of Expectations and benchmarks for other services to drive performance. Review and formalise internal and external referral processes.
05	<p>Systems, Processes and Procedures:</p> <ul style="list-style-type: none"> Division staff collate issues and advice regarding their experience (and the experience of applicants where possible) with the NSW Planning Portal and use all avenues available to input into the State Government’s Portal improvement program. Information Technology solutions and operational efficiencies to improve services continue to be explored and implemented, including review of internal guides; automation or part automation of s10.7 planning certificates (which is dependent on good data inputs); improved interface between Council systems and the NSW Planning Portal together with communication of improvements made.

06	<p>Organisational Structure:</p> <ul style="list-style-type: none"> • A Manager is recruited with the skills to effectively manage the functions of the Division. This person will likely require some technical capability in building surveying or planning and development, but this is less important than good leadership skills. • At a time to be determined by the General Manager, consideration should be given to placing the Division with the strategic planning team (in the Regional Activation or similar Directorate or alternatively and less preferably, with the Community Directorate). Together with a focus on improving collaboration and communication between directorates, this should improve outcomes for external stakeholders and staff.
07	<p>Resources:</p> <ul style="list-style-type: none"> • Develop future focused plans and ensure continuous/agile management of staff levels with budget to use consultants/contractors where necessary. These plans should include leave arrangements, workloads, succession plans, management of 'key or single person risk' and aim to provide continuity of services. • Continued focus on ensuring the Division is a great place to work with clear expectations and regular monitoring of performance; formalised and transparent flexible work policies and practices and good change management.
08	<p>Strategy:</p> <p>An annual strategy is developed for the Division (and refreshed each year) which focuses on 'problem solving' and 'good decision making' including a clear explanation of the challenges faced in providing the Division's services, an overall approach to overcoming those challenges and a small number of coherent actions that will address those challenges. This should complement existing business plans, the Service Review recommendations and allow staff to know where to focus their work each year.</p>
09	<p>Resources to address risks and best practice management of issues:</p> <p>The Division develops and implements plans to address current risks in legislative compliance and best practice management of issues raised in the Review. Funding for this work is available from unspent salaries and consultancies this FY. Alignment of roles and responsibilities should then be determined in consultation with other directorates and the General Manager.</p>
10	<p>Alternate models of service delivery:</p> <p>At the discretion of the General Manager, further consideration is given to alternate models of service delivery including the establishment of a county council for the provision of planning and development services to a broader regional area. To progress this opportunity, dedicated resources are needed to prepare a plan, ensure consultation and support from relevant stakeholders including the State Government.</p>
11	<p>Budget:</p> <p>When the findings and recommendations of the Service Review have been accepted by Council, the Division works with the Finance team to build a zero-based budget commencing FY 25/26.</p>

6. Data Gathering

6.1 Economic and Strategic Context

Wagga Wagga is the largest inland regional city in NSW and is planning for a long-term population of 100,000 people by 2040. The city will need to provide an additional 14,000 homes to support this target. A mix of new greenfield development, infill and urban renewal is required to provide these outcomes. The key outcome identified in the Wagga Wagga Local Strategic Planning Statement is to find the balance between growth, the natural environment, sustainability, and liveability. Growth is directly linked to future business and service capacity. Opportunities exist for connecting current and new service and employment areas with residential areas to meet future demand and expansion.

Supporting key industries across the city is imperative to ensure the city continues to grow and attract new business, services, and investment. Growth also provides unique challenges - the community values heritage and urban design elements that form the urban character of the city.

Where change is proposed or supported, this can threaten and challenge those values. Wagga 2040 supports the value, and the community's appreciation of, existing significant urban characteristics and features and will, where significant value exists, seek to protect, and enhance this value and character.

The natural assets on which the city was founded continue to add value to the community's lifestyle choices and liveability, but they also present significant hazards and risks that must be planned for and managed. The Murrumbidgee Riverine corridor bisects the city and risks and dangers to the city and community will be managed to guide future opportunities and manage existing liabilities. Wagga 2040 sets out principles for Council decision making including: connectivity to the central core, accessibility to services and community facilities to ensure growth is financially and environmentally sustainable.

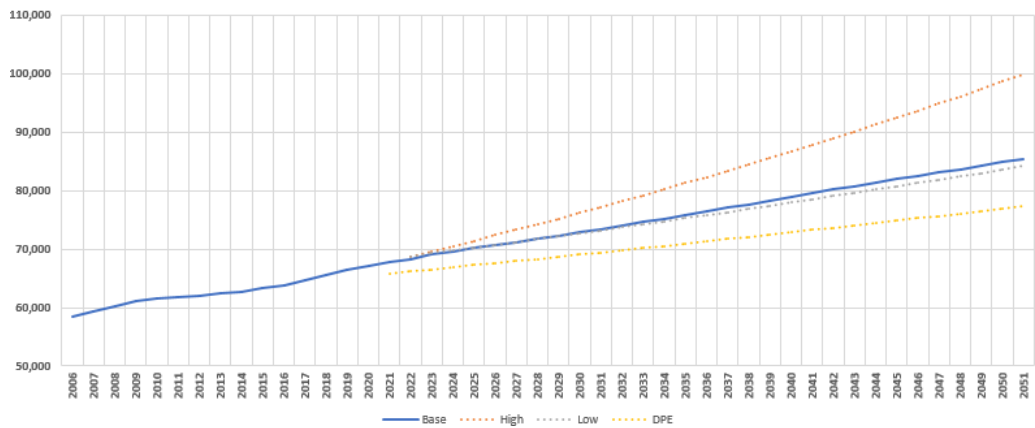
Wagga Wagga Local Government Area – Economic Snapshot June 2024

Key Statistics

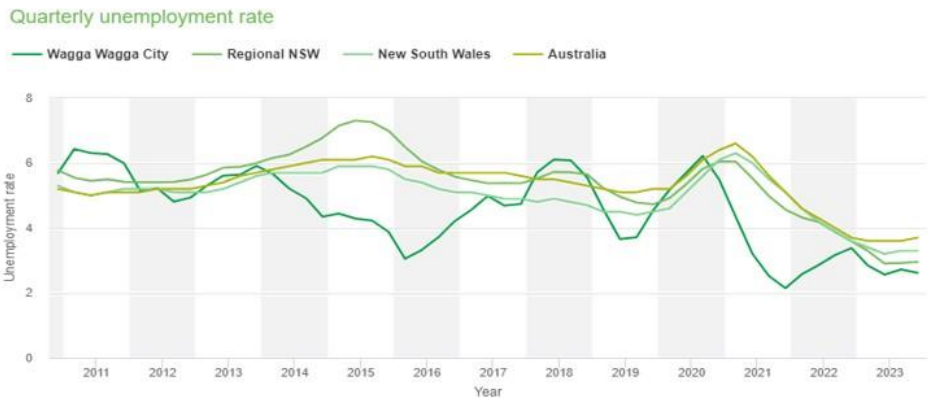
GRP \$5.41 billion <small>NIEIR 2023</small>	Population 68,716 <small>ABS ERP 2023</small>	Local jobs 40,170 <small>NIEIR 2023</small>
Largest industry (by employment) Health Care and Social Assistance <small>NIEIR 2023</small>	Local businesses 5,957 <small>ABS 2023</small>	Employed Residents 38,947 <small>NIEIR 2023</small>

Population Forecast

Population Projections (June 2024) - Wagga Wagga LGA



Labour Market Conditions remain very tight



Source: Australian Bureau of Statistics, Labour force survey catalogue number 6202.0, and Department of Employment, Small Area Labour Markets. Compiled and presented in economy.id by .id (informed decisions).

6.2 Emerging trends relevant to planning and development

Service/Activity	Emerging Trends	Issues associated with the emerging trend	Opportunities associated with the emerging trend
All Development Assessment and Building Certification services	Significant focus from all levels of government on solving the housing crisis with a broader economic outlook predicting significant growth in Wagga Wagga .	Pressure and focus on planning and development teams to solve the crisis by faster assessments and decisions in a tight labour market often with insufficient experienced resources.	<p>Early input and greater collaboration with Council’s strategic planners to ensure alignment of goals and outcomes.</p> <p>Agile management and focus on ‘future proofing’ of the Division’s resources including investment in junior staff to ‘grow your own’ resources.</p>
Development Assessment and Planning Proposals	Increased focus from state and federal governments on a ‘nature positive’ approach to the environment and biodiversity with further regulatory and legislative changes likely.	<p>Objectives and implementation of a nature positive approach to the environment often conflict with ambition to drive housing, development and growth, and increase costs.</p> <p>Uncertainty and increasing need for approval bodies to consider environmental requirements in planning and development decisions together with need to educate stakeholders on requirements.</p>	<p>Communication with stakeholders to facilitate understanding and implications of the ‘nature positive’ approach.</p> <p>Learning and development opportunities for Council staff including collaboration with Council’s environmental team.</p>

Service/Activity	Emerging Trends	Issues associated with the emerging trend	Opportunities associated with the emerging trend
<p>Development Assessment and Planning Proposals</p>	<p>Minister for Planning made an Environmental Planning and Assessment (Statement of Expectations) Order 2024 on 1 July 2024 setting out performance requirements for key planning and development functions.</p> <p>There is potential for further legislative change to drive the NSW Government's agenda. This includes a proposed Building Bill aimed at improving the quality of buildings in NSW and oversight of the building industry.</p>	<p>If a council is found not to be meeting these expectations, the Minister can take that into consideration as part of determining if it is appropriate to appoint a planning administrator or regional planning panel to exercise a council's functions.</p> <p>Resources are required to ensure changes are understood by all stakeholders and reflected appropriately in processes and procedures.</p> <p>The Division provides a significant range of services that are not part of this Statement of Expectations but support growth and development.</p>	<p>Minister's expectations are clearly defined and measurable.</p> <p>Council's performance can be benchmarked against all other councils in NSW.</p> <p>This data can be used to drive a more collaborative approach with industry and applicants.</p> <p>Need for Review recommendations to set the Division up as agile and responsive to legislative/regulatory changes.</p>
<p>Development Assessment</p>	<p>To assist with fast tracking the implementation of Artificial Intelligence, Council has received a grant of \$170k to pilot the use of AI in the pre-lodgement stage of the DA process.</p>	<p>Expectations that AI will make the assessment process faster are high, however the pilot project is aimed at ensuring better quality applications are lodged and the AI does not assist in the assessment process.</p> <p>Implementation of the pilot system is required by 30 June 2025 at a time when Council is upgrading other parts of its IT infrastructure.</p>	<p>A user-friendly interface with the Portal and Chatbot function should improve the customer experience at lodgement stage.</p> <p>Better quality applications should improve assessment timeframes.</p>

Service/Activity	Emerging Trends	Issues associated with the emerging trend	Opportunities associated with the emerging trend
<p>All Development Assessment and Building Certification services run through the NSW Planning Portal</p>	<p>The NSW Planning Portal has a key role in delivering 377,000 homes over the next 5 years and strengthening the state's commitment to the federal government's National Housing Accord. The NSW government has allocated \$20.4 million to improve NSW Planning Portal operations with various key initiatives aimed at: upgrades to fix legacy issues; improving user experience and accessibility; strengthening cybersecurity resilience and information privacy; providing a two-year roadmap.</p>	<p>There is a continued focus on 'self-service' and increasing mandatory requirements that planning and development applications are run through the NSW Planning Portal. However, the Portal does not work seamlessly with Council's systems and consideration time is spent assisting applicants with the Portal and then integrating information between systems.</p> <p>One- or first-time users of the Portal often require assistance from Council or consultants which takes time and resources.</p>	<p>Council staff are well placed technically to participate in improvement plans for the Portal.</p> <p>Better support and understanding of fees and charges will assist applicants.</p> <p>Improved information and guidance on good quality applications will assist applicants.</p>

Service/Activity	Emerging Trends	Issues associated with the emerging trend	Opportunities associated with the emerging trend
<p>All Development Assessment and Building Certification services</p>	<p>Lack of qualified planning and building surveying professionals, particularly in regional NSW, makes recruitment and retention of resources difficult.</p> <p>Flexible working arrangements continue to be a standard expectation of existing staff and applicants for advertised roles.</p>	<p>Psychosocial safety and risks requiring management in the workplace continue to increase, particularly from high workloads.</p>	<p>Develop a work value proposition for Council and sell Wagga Wagga as a great place to live and work.</p> <p>Formalise flexible working arrangements to ensure availability and consistency.</p> <p>Consider additional inducements to recruit talent (e.g. subsidised rent, Council owned share accommodation). Ensure active management of resources including training and development and funding for consultants/contractors.</p>

7. Detailed Findings

Activity / Findings

7.1 Performance of the Division with regards to current service levels, sector wide benchmarks and external trends

Core Services

External stakeholders generally measure the performance of planning and development services on timeframes (discussed in the next section) and whether the decision 'goes in their favour'. However, there are a number of qualitative and quantitative measures that can be used (for example: customer experience, complaints, appeals, job satisfaction and workloads). The Review suggests the focus of performance should be on 'good decision making' which involves not just the speed of decisions but the quality of decisions, including the need to comply with the regulatory framework, the interests of objectors, transparent and fair process, a risk matrix and the future vision and broader plans for Wagga Wagga as a city. Ensuring resources are focussed and clear on the outcomes and services to be delivered is essential.

The Division currently manages all applications effectively and consistently through its Property and Rating System ensuring statutory compliance for Council in performing its regulatory functions. A summary of the quantum of services delivered by the Division over the previous three financial years is at Attachment C. In Financial Year 23/24, the Division managed 7,369 applications (an average of 28 per business day).

Overall, while performance can always be improved, the Review has found that over Financial Years 21/22, 22/23 and 23/24, the Division's performance is well above the average of councils in NSW based on the quantum of work delivered with a high level of regulatory compliance given the number of staff employed. That said, the Review and the Division's staff acknowledge that averages do not always tell the whole story and there are examples where the Division's performance has not been acceptable to specific applicants and stakeholders. Most performance concerns come from the local development industry and it is clear that the customer experience can be improved. A consultation summary including 'what we heard' is at Attachment E. Consultation is ongoing and will be embedded in a new communications plan,

While core services are generally delivered effectively, there are also several areas of risk where services need to be improved. Deficiencies identified result from a lack of resourcing, management oversight or clarity on roles and responsibilities. These include: fire safety schedules and annual statements; section 10.7 planning certificates; regulation of underground petroleum storage systems and management of land contamination; administration of the native revegetation policy; trade waste and E1 certifications.

Context

This performance has been delivered in a very difficult environment: there is a nation-wide shortage of professional staff in both planning and building certification. This means at any point in time there are generally around four vacancies in the Division (with a full-time equivalent (FTE) staff of 30), some staff on leave, existing staff with high workloads and key staff with significant excess leave. A NSW Government media release dated 21 April 2024 states that 'between 2021-2022 and 2022-2023, shortages of planners contributed to a 28 percent increase in the average number of days taken

to determine local development applications in NSW'. Attempts to recruit and retain staff with experience have often been unsuccessful. When combined with regular criticism from stakeholders and without careful leadership, these types of working environments tend to lead to employee burnout, low engagement, and reduced outputs.

Capability of Staff

The Review has considered both the capability and capacity of staff to deliver what is required of them. There is a high degree of local experience, knowledge, and technical expertise in all groups within the Division which is an asset to Council. The coordinators of these groups take their responsibilities seriously and work well together to deliver services.

Teams have taken on cadets, often when recruitment of experienced staff has failed. Most of the current Building Certification team started with Council as cadets. This approach is to be commended, should continue, and has provided career progression opportunities for Council staff in areas such as Customer Service. Council's 'grow your own' approach to resources will be essential to keep up with demand and growth in the city over time. All opportunities to partner with other entities (such as TAFE, universities, and other councils) and funding opportunities should continue to be explored. It should also be noted that training and support for inexperienced staff always takes time and often diverts senior staff from core services. Senior staff all express a desire to spend more time on training and development of cadets or new administrative staff. However, to do this effectively they require improved support from central functions.

There is no indication (for example, through overturning of decisions by a court or significant complaints) that the Division is lacking in technical capability, noting that it is difficult to attract and retain building certifiers with A1 and A2 accreditation needed for commercial properties and consultants or contractors are often required to provide this level of service. More detail and a plan for maximising levels of current building staff accreditation is in Attachment F. Further, a senior planner in the state government advised the Review that they often seek the expertise of the Division's senior planners when considering changes to the planning framework and the impact of legislative change on regional communities. This indicates a high regard for the technical expertise of the Division within the planning community – a view confirmed by the Review's planning consultant, Planning Ingenuity.

A lack of consistency in decisions has been raised as a concern by stakeholders together with a view that 'some planners are easier to work with than others':

- Experience tells the Review that this issue exists in many professional service organisations and there is no evidence of good practice in other councils (not already being used by Wagga Wagga) which could address these concerns.
- Consistency of process is ensured and driven by the comprehensive planning administration system contained in council's Property and Rating System – one of the best Planning Ingenuity has seen.
- Consistency of decisions is supported by the practice of peer review (which is also recommended by the NSW Department of Planning, Housing and Infrastructure's best practice guide) and the Division's existing informal and formal collaborative ways of working amongst professional colleagues (for example, all new more complex DAs are reviewed at an initial meeting of all planners and relevant staff from other Divisions and surveyors discuss complex issues at weekly meetings).
- However, the process for determination of acceptable risk to Council when decisions are difficult is unclear to Division staff – this may lead to longer timeframes or requests for further information as staff seek to be very certain of their decisions. This situation is likely exacerbated when

staff lack confidence that they will be supported by management if they make a mistake.

Capacity of the Division is dealt with below under Division Structure.

All staff have been open to the Review and actively engaged on ideas to improve performance. They are to be commended for this approach and it bodes well for successful implementation of the recommendations.

A good example of this engagement is the pilot program to reduce duty planning services for six weeks in June/July 2024 (noting other improvement initiatives were also being used at this time). This is discussed in more detail at Attachment G, however in summary, a significant backlog of development applications was reduced by the Division as follows:

- On 12 June 2024, Council had 189 outstanding development applications including modifications.
- At the end of the pilot program on 24 July 2024, this number had been reduced to 154 outstanding applications.
- During that period, Council had also received an additional 84 development applications.

At 31 August 2024, this number has reduced to 108 outstanding applications.

Areas of Focus for Improvement

After consideration of best practice in other planning and development teams and current ways of working, the Review has identified the following three externally facing areas of focus where targeted change should lead to improved performance and customer experience:

Quality of Information Received:

Council has a strong 'customer centric' service approach. (See Customer Service in section 7.5 below.) Planners and Building Surveyors are also trained or required by regulation to avoid conflicts by ensuring they 'do not give advice and then certify or assess an application based on that advice'. These approaches mean that staff rarely reject or refuse applications outright – rather they seek ways to 'fix' or 'pass' poor quality applications by encouraging 'further information to be provided or another set of plans' (without providing direct advice) that might allow them to accept and approve the application. This takes time and applicants often feel they are being treated inconsistently and that requests for information are unnecessary – staff are 'just being difficult' or 'manipulating timeframes'.

The Review has found no evidence that requests for information are being issued to 'stop the clock' and keep timeframes down. In any event, the Minister for Planning's new Statement of Expectations is based on gross days for decisions as shown in the NSW Planning Portal, not timeframes using 'stop the clock' data – see Timeframes below. This also indicates that an improved collaborative approach with applicants is required to meet performance expectations – see Communication below.

According to a media release from the NSW Minister for Planning on 5 July 2024, 'of nearly 500 applications accepted into the Regional Housing Flying Squad Program in the past year additional information was required for around 30 per cent of development proposals with applicants taking, on average, an additional 42 days to respond with the information. The combined saving of not having to request additional information on this relatively small group alone would be around 6300 days – or the equivalent of 17 years'.

It is self-evident (and the data below indicates) that good quality applications can be assessed and determined faster. The Review has therefore focussed on how to improve the quality of information received for better performance and timeframes.

In FY23/24, according to its Property and Rating System, Council received:

- 748 applications for DAs and DA Modifications
- 294 or 39% required further information
- 385 of these were less complex 'category 1' applications.
- 174 or 45% of these category 1 applications required further information.
- Average timeframe where further information was requested was 69 days per DA
- Average timeframe where no information was requested was 36 days per DA.

Communication and customer experience:

There is consensus that better communication is required between applicants and Council, particularly on the progress of applications. Even if decisions take a long time, applicants are seeking a better understanding of the process and updates on progress of applications. This issue is raised regularly in complaints received from applicants. Council's DA tracker is comprehensive but difficult to find online – it is also unlikely to ever satisfy applicants who want to know when a decision will be made.

Currently many applicants use the General Manager as a point of escalation for their concerns, often when they do not like the advice received from Division staff. Although the General Manager and Councillors should always be available to address concerns, this is not an efficient escalation process and staff often feel undermined or unsupported.

Division staff are reluctant to provide timeframes for when decisions will be made and regular criticism from stakeholders is not conducive to good communication. It will be important for the new Manager of the Division to drive ways of working to improve the customer experience. This should involve a 'pick up the phone' approach rather than more emails.

The requests from stakeholders for better communication also include more regular updates on strategic and operational issues, such as changes to Local Environmental Plans and Development Control Plans, staff changes or availability and process changes. A regular communication channel with frequent users of the planning system could also be used to raise and address industry concern about inconsistency in requests for information or decision making.

Duty Services:

Currently Council's duty planners and building surveyors are rostered and available from 8.30am to 5pm five days per week. The duty officers answer phone queries and in-person queries at the Customer Service desk.

Whilst this service and the general availability of Division staff to answer queries is highly regarded by the community and consistent with a 'customer centric' approach to services, it is unclear whether it results in better quality and faster outcomes for applicants. It is however a significant commitment of time for staff who must be available to answer queries and are unable to undertake core assessment and

determination work effectively when they are on duty. There are also concerns that duty staff provide answers which are different from those given by other staff later in an assessment process. This is very difficult to address without insisting on written queries with complete information – duty services are intended to be more general in nature and are undertaken by all staff (regardless of experience). This resourcing is driven by the small number of planners in the team together with training and development requirements.

Most other councils contacted by the Review team limit the availability of their duty services – ranging from ‘by appointment only’ to four hours (often every afternoon) five days per week. This is viewed as best practice and frees up time to ‘get the work done’. Some councils charge for parts of this service or require information to be submitted prior to contact with a duty officer. One of the aims of the new concierge services is to improve the customer experience overall.

Evaluation of a pilot program which restricted duty planning services to four days per week for six weeks in June/July 2024 (including analysis of the number of calls and queries received by duty officers, together with practices at other councils) is at Attachment G.

Areas of focus involving internal change or operational efficiencies are addressed below.

Recommendation(s)	Management Response
<p>01 Quality of Information Received:</p> <ul style="list-style-type: none"> Working with Customer Service and Communications, develop and trial a ‘front end’ concierge service covering lodgement of applications, better information, and support to improve the quality of information received in applications and timeframes. Review and update where necessary Council’s website, forms, checklists, and publicly available information to ensure a more user-friendly experience. Work with Council’s IT team on the Artificial Intelligence pilot program to assist with improving the pre-lodgement stage of the DA process. 	<p>Commenced, noting:</p> <ul style="list-style-type: none"> This may result in earlier and more returns or rejections of applications, but applicants will also receive more support through improved guidance and advice. Capability and funding required for any ongoing concierge team (after the trial period) needs further consideration including consultation with other areas of Council. Resourcing for updating the website and publicly available information will be needed to ensure time is not diverted from core services.
<p>02 Communication:</p> <p>Clarify expectations for individual staff to improve the customer experience and work with Communications team to develop a communications plan which includes regular updates to applicants and industry using all channels available and face-to-face briefings.</p>	<p>Commenced</p>

Recommendation(s) cont.	Management Response cont.
<p>03 Duty Services:</p> <p>Redefine planning and surveying duty services and reduce hours of service to either mornings or afternoons five days per week. Hours to be determined after further internal consultation, particularly with Customer Service, and development of a communications plan.</p>	<p>Supported, noting that this needs to be considered in conjunction with the trial concierge service.</p>
<p>7.2 Timeframes for all services provided by the Division</p>	
<p>The NSW Minister for Planning has set out acceptable timeframes for certain core services in an Environmental Planning and Assessment (Statement of Expectations) Order effective 1 July 2024 and the Department of Planning, Housing and Infrastructure (DPHI) is publishing league tables with all councils' performance against these timeframes (using gross days, not 'stop the clock' data).</p> <p>In summary, the Order requires:</p> <ul style="list-style-type: none"> • Development applications to move from submission to lodgement asap or on average within 7 days from 1 July 2025 (Council is currently at 6 days and is ranked the 16th fastest council in NSW, noting that the two fastest councils have made one lodgement each). • Determination of development applications asap and whichever is the lesser of councils' previous FY average or on average 115 days from lodgement from 1 July 2024 reducing each year to 85 days from 1 July 2027 (Council is currently at 72 days with the average being 101 days for regional councils and 108 days for all councils in NSW). • Preparation of assessment reports for referral to a regional planning panel asap and within an average of 250 days from lodgement (Council does not currently have any data in this league table, however the Review was advised by the Manager of the relevant Regional Planning Panel that 'Wagga is one of the best in NSW'). <p>Many industry stakeholders refer to 'statutory timeframes' for determinations. In summary, there is no statutory period for determination, however the Environmental Planning and Assessment Regulation 2021 sets out a deemed refusal period of 40 days after which a court appeal can be made. The NSW Portal Planning indicates that in Financial Year 23/24 only eight councils in NSW had an average assessment timeframe less than 40 days. The Development Assessment Best Practice Guide issued by the Department of Planning, Housing and Infrastructure states that 'in general, assessment officers are capable of achieving the 40-day assessment timeframe when they manage up to 25 relatively straightforward DAs at any one time'. These timeframes 'increase proportionally' when DAs are 'more complex or the numbers are higher'. Whilst not directly comparable, in FY 23/24 the Division determined 559 development applications with a staff of around nine planners – that is, an average of 55.9 per planner – and Division staff workloads hover around 20 to 25 DAs for cadets and up to 30 DAs for senior planners at any point in time.</p>	

An analysis of data from Council's Property and Rating System and the NSW Planning Portal, including benchmarking, can be found at Attachment C.

Given current resourcing and the quantum of applications received, the average timeframes for delivery of services by the Division can be considered good, with room to improve. With the exception of the Building Certification group and although regular reports are produced, the Division does not effectively use regular monitoring or dashboard reporting to drive performance including timeframes.

Referrals

It is difficult to gather accurate data specific to Wagga Wagga from the NSW Planning Portal and Council's Property and Rating System on time taken for referrals.

Generalised data for referrals to State Government agencies is at Attachment H. Anecdotally, there is some improvement to be made with some external agencies, but it is not a regular significant cause of delay in Council's timeframes. For example, the process for referrals is working well with Riverina Water but needs improvement with Essential Energy (where the standard referral timeframe of 21 days is usually the minimum time taken and no contact details are provided by Essential Energy for the relevant referral officer to discuss issues).

Generally, the internal referral process is not considered by staff to be a cause of significant delay. All new more complex development applications are reviewed at a weekly meeting with standing invitations to relevant Council staff from other directorates for early flagging of potential issues (eg Supervisor, Tree Planning and Management, and Contributions Coordinator). Best practice theory indicates that this meeting could be used more effectively with compulsory attendance and quick 'approval' (even at the meeting) of simple applications. In practice, staff advise this has been tried previously and was not effective. Similar feedback was received by the Review from other councils.

However, there is not a consistent focus in the Division on, or tracking of, how long referrals take or a visible commitment to prioritise referrals in other directorates or external entities. Some councils use Service Level Agreements (SLAs) to set expectations and ensure there is management focus on this issue. The experience of the Review Lead is that SLAs are a waste of time without regular tracking, reporting and follow up. Statutory timeframes are also clear for all referrals.

Consistent with the findings of Planning Ingenuity, the Review therefore suggests a focus on:

- Updating expectations, Property & Rating templates (including potentially requiring referral entities to provide reasons for conditions) and monitoring of referrals (including responsibility for follow up when they are not provided within agreed timeframes and escalation pathway through Executive Team).
- Clarifying requirements for referrals to the building surveyors (there is a current backlog on these referrals).
- Reviewing the number of 'single person' risks that sometimes cause delay in assessments (for example, Council has one Contributions Coordinator and limited resources in flood engineering and environmental advice) and working with the relevant directorates to find solutions.

Recommendation(s)	Management Response
<p>04 Accountability</p> <ul style="list-style-type: none"> Implement regular reporting of timeframes against Minister's Statement of Expectations and benchmarks for other services. 	<p>Commenced, noting on 31 August 2024, the following number of applications were waiting for assessment or completion:</p> <ul style="list-style-type: none"> Development Applications including modifications – 108 Construction Certificates – 20 Complying Development Certificates – 1
<ul style="list-style-type: none"> Review and formalise internal and external referral processes. 	<p>Supported</p>
<p>7.3 Supporting systems, processes, procedures and policies together with ways of working, including any relevant dependencies</p>	
<p>Supported by work from Planning Ingenuity, the Review has found that the Division's underlying systems, processes and procedures are extensive and generally fit for purpose (there are some exceptions which are noted below). In particular, the Development Assessment and Building Certification groups are well supported by the Planning Administration team (which does not occur in many other councils). This administrative support enables consistency in process and allows the planners and certifiers to focus on assessments and approvals. Many of the Administration team have a 'para-planner' degree of expertise equivalent to the new TAFE Diploma of Planning. They also deal efficiently with a very high volume of tasks. See Attachment C.</p> <p>There is however a view from staff within the Division that they are often 'reactive rather than proactive' in their ways of working and there is insufficient focus on continuous improvement and feeding 'lessons learnt' into improved processes. There are many examples of this approach, ranging from insignificant (such as the duty service call logs not being regularly reviewed and fed back to Customer Service to reduce wasted time on repeat, simple issues) to important (such as the Development Control Plan requiring updating).</p> <p>The exceptions to fit for purpose systems, processes and procedures generally relate to: up to date guides and templates for new planning staff and unlawful development; applications for Building Information Certificates are not yet made through the NSW Planning Portal despite this being a mandatory requirement (implementation has been delayed due to difficult invoicing arrangements for regular debtors); implementation of native vegetation policy and management of contaminated land.</p> <p>There are several dependencies and other capabilities relied on by the Division when providing services in relation to systems, processes and procedures. These include:</p> <ul style="list-style-type: none"> Heritage advice – Council engages a heritage architect who works in the region with several councils. He is available as required for advice and assessments and is generally in Council's offices one day per month. This arrangement is considered effective given the volume of work required. It has however been partly funded by a grant from Heritage NSW (now ceased) and there are opportunities for Council to increase its 	

commitment to heritage issues in the future. Succession planning should also occur in relation to both the consultant and planning staff with heritage experience.

- NSW Planning Portal - the NSW Planning Portal is mandatory for a range of services. A number of stakeholders expressed concern about usability of the Portal and new applicants often criticise Council for Portal issues and charges. Council staff also express frustration with the Portal – these are primarily administrative issues which slow down location of data and assessment of applications. These frustrations have been acknowledged by the Minister for Planning who has set up a team with more than \$20m of funding to improve the Portal. Council staff are well placed to contribute and are already engaged with the Portal improvement team.
- Information Technology – the systems used by the Division do not work seamlessly with the NSW Planning Portal or each other. For example, while development assessment applications are automatically transferred from the Portal to Council’s Property and Rating System (P&R) via an Application Programming Interface (API), it often takes one administrative officer more than 30 minutes to rename and number the attachments in just one application so they can be used in P&R. Further, the September 2024 migration of Council’s TechOne systems to the cloud will cause double handling and delays to some of the tasks currently being undertaken by the Division in P&R and council’s record management system (ECM). This is disappointing but currently unavoidable as the current systems will no longer be supported and this step is required as part of a longer-term plan to upgrade Council’s IT systems.

Recommendation(s)	Management Response
<p>05 Systems, Processes and Procedures</p> <ul style="list-style-type: none"> • Division staff collate issues and advice regarding their experience (and the experience of applicants where possible) with the NSW Planning Portal and use all avenues available to input into the State Government’s Portal improvement program. 	<p>Commenced, this should include input from Council’s IT team into the proposed technology roadmap.</p>
<ul style="list-style-type: none"> • Information Technology solutions and operational efficiencies to improve services continue to be explored and implemented, including review of internal guides; automation or part automation of s10.7 planning certificates (which is dependent on good data inputs); improved interface between Council systems and the NSW Planning Portal together with good communication of improvements made. 	<p>Commenced</p>

7.4 Division structure and employee salaries including benchmarking

Directorate Structure and Leadership

Many stakeholders raised the fact that the Division reports directly to the General Manager rather than a dedicated Director of Planning as an issue affecting performance. Given the GM's workload, this was seen as slowing down resolution of issues raised by applicants, an inefficient escalation pathway for concerns and isolating Division staff from regular input to, and information from, Council's Executive Team including the ability to collaborate effectively with other directorates. The Division has also been without a permanent Manager for some months.

The Review's analysis of directorate and division structure in other councils (see Attachment I) did not provide any guidance on 'best practice'. There does not appear to be any consistency or standard practice between councils in relation to groupings of functions or even number of directorates. The Review suspects these decisions are generally made by a general manager or council depending on priorities, funding and specific resources at any given point in time.

There is, however, a general tendency for the strategic planning function to sit in the same directorate as the statutory planning and building certification functions. This alignment of functions is also considered best practice for training and development of junior planners who can broaden their experience across both strategic and statutory planning. This would be consistent with Council's objective of being a 'learning organisation' (noting that physical colocation allows for ease of collaboration and learning but is not essential to this aim).

From experience, the Review considers relationships and a commitment to collaboration as more important than organisational structure. Given that change is often disruptive and costly, it is also important that any organisational change is well analysed and considered for benefits prior to implementation.

After the analysis above, the Review has focussed on ensuring that the Division is well set up and operating efficiently with a new Manager being recruited to lead the Division. The number of staff in the Division (about 30 FTE) does not justify the appointment of a new Director for the Division. Rather, the General Manager should explore opportunities to place the Division with either the Regional Activation or Community Directorates or some different directorate arrangement in the future. This type of organisational change is not urgent – the Division should focus on other improvements and recommendations in the short to medium term.

Division Structure

The team groupings within the Division (Planning Administration, Development Assessment and Building Certification) make logical sense and have worked effectively for a significant period. Some councils have administration staff appointed to specific planners and surveyors or working more centrally on broader administrative tasks. Planning Ingenuity were highly supportive of the current arrangements, particularly the allocation of both planners/surveyors and specific administrative staff to each application for the life of that application which facilitates a 'project management' rather than 'task oriented' approach driving higher quality and consistent outcomes.

Given the technical expertise and workloads of the current Planning Administration staff, the Review found there would be no benefit to changing the current groupings - except to the extent of standing up the new concierge service referred to above. The new concierge service will be trialled using

existing resources and a limited number of applications. If the function becomes permanent, additional resources (likely 2 FTE) will be required.

Despite a general sense of professionalism and respect across the Division, there are opportunities to improve collaboration and morale between the groups within the Division. Whether perceived or real, the Review heard that not every person was considered 'equal' in the Division and contributions were often not recognised or celebrated. This is the responsibility of every team member and there is nothing better in a workplace than being part of a good team that recognises all contributions. The Review encourages a continued focus on this issue, particularly by the new Manager. Council's People and Culture team also have high quality programs focussed on improving these kinds of issues. Division staff are encouraged to participate in these programs.

The existing Council and Division organisational structures together with a proposed Divisional structure are at Attachment D.

Compliance Function

The Compliance Group recently moved from the Division to report within the Community Directorate and is subject to a separate review being undertaken by the Director, Community. Close to 80% of the work of the Compliance Group currently relates (appropriately) to building and development. However, there are opportunities to boost collaboration with and utilise capabilities in the Regulatory Group to improve the ways of working and services provided by the Compliance Group.

This Review has found that generally interactions between the Building Certification and Compliance Groups are documented and effective. The Development Assessment Group also generally works with Compliance effectively. There are some exceptions that require focus and improved processes, including unlawful development and swimming pool compliance. These 'ways of working' should be monitored if the Compliance Group continues to sit in another Directorate.

Staff Salaries

There is a general perception in the Division that many staff are underpaid, particularly when compared with their metro-based counterparts. This issue has also been raised by external stakeholders with frustrated comments such as: 'if you just paid another \$100,000 you would have enough certifiers and I wouldn't have to wait until next Tuesday'. There is also concern that staff in other Council directorates have been recruited with allowances and paid retention bonuses, which is considered unfair when long term staff have no such opportunities and undermines collaboration between teams. Staff seek to have their significant experience and expertise recognised and valued by Council.

It is standard policy (in most public sector organisations) for staff to start their role paid on the 'first step' of the relevant grade for that role. Under the Local Government (State) Award and Council's Salary Progression Guidelines, pay increases are based on performance and available every year for six steps – so it takes seven years to reach the maximum pay for a particular role. 61% of staff in the Division have been in their roles for more than seven years and 42% for more than 12 years. This presents great opportunity (to use their significant experience and expertise) and some challenges (how to reward this and retain their services).

Experience tells the Review that long-term staff are well placed to provide outstanding services when they are engaged, well respected and particularly in times of crisis or when solving difficult issues. Good employers use staff with significant experience and technical expertise on their 'wicked problems' and to train less experienced staff. Conversely, long-term staff in Council have seen some new leaders and programs fail to deliver

any real change and benefits or worse, often many times over. Public sector entities also struggle to recognise and reward loyalty, experience, and good performance. Most private sector entities do this by financial bonuses.

Council has recently engaged with the University of South Australia in a research project into reward and recognition of staff in Local Government. Staff across Council will be invited to be part of this project in September 2024. This research will be used to inform how Council can shape its reward and recognition approach and the Review encourages a focus on long-term staff, transparency, and fairness. The Division's staff should participate in this project.

Existing grading of roles within the Division appear appropriate within Council's current salary system. However, the General Manager has recently advised that the Salary System will be reviewed within the term of the new Council. The aim of that review will be 'to reduce the overlapping grades which can produce unusual results because entry to one grade might be at a lower level of remuneration in comparison to higher steps in a lower grade. We will also look at new evaluation methodology'. This review should consider whether the Planning Administration Group's current practice of having all administrative officers at the same grade (Grade 8) is appropriate. The advantage of this approach is that all officers undertake all types of administrative work and can cover for leave and extended absences or turnover of staff. However, it does not allow for any career progression within the team or recognition of significant experience (except through the 'step' increases within the grade).

Overall, the Review found that salaries are generally in line with other regional councils and benchmarking is done when roles are recruited, often with the assistance of external recruiters for senior roles. One exception is the role of town planner which is at the lower end of the benchmarking data. The Development Assessment Coordinator role is about to be recruited and a market allowance incorporated if necessary. There is also opportunity to review all workplace arrangements (particularly as recruitment is undertaken) and formalise workplace policies to ensure transparency and consistency of arrangements. This should improve work satisfaction that is usually driven by more than remuneration. A high-level summary of the benchmarking of salaries is at Attachment J.

Additional inducements to attract talent (such as subsidised rent or accommodation in Council owned property) are used in other councils. These should be considered on a Council wide basis to address future growth and implemented with a consistent policy and guidelines if adopted.

Staff in the Division generally function well as a team and enjoy their work (despite having high workloads). However, the Review found a current lack of good workforce management practices in the Division. For example, flexible work arrangements were ad hoc and unclear, Individual Performance and Development Plans were not up to date, there was a general lack of communication and meeting focus, and key staff were often unclear about budgets and where to focus their energy.

Role descriptions generally appear up to date or are being updated as roles are recruited. However, there is a lack of clarity around responsibility for issues that fall outside of core services. For example: providing advice on state significant development or strategic planning issues; ensuring legislative or regulatory changes are operationalised; responsibility and implementation pathways for continuous improvement actions.

Recommendation(s)	Management Response
<p>06 Organisational Structure</p> <ul style="list-style-type: none"> A Manager is recruited with the skills to effectively manage the functions of the Division. This person will likely require some technical capability in either External recruitment process completed with Cameron Collins to commence as Manager of the Division on 8 October 2024. 	<p>External recruitment process completed with Cameron Collins to commence as Manager of the Division on 8 October 2024.</p>
<ul style="list-style-type: none"> At a time to be determined by the General Manager, consideration should be given to placing the Division with the strategic planning team (in the Regional Activation or similar Directorate or alternatively and less preferably, with the Community Directorate). Together with a focus on improving collaboration and communication between directorates, this should improve outcomes for external stakeholders and staff. 	<p>Noted</p>
<p>7.5 Levels of support within the team or Council to meet the service levels agreed to be provided and expected by stakeholders</p>	
<p>Customer Service and ‘front-end’ lodgement of applications</p> <p>The Division works closely and well with the Customer Service team to provide many of its services. The Customer Service team deals with an average of 4200 calls per month and is currently working on a knowledge base to assist Customer Service officers with ‘first call resolution’ of issues raised.</p> <p>The Review heard that calls are sometimes inappropriately referred to the Division’s duty officers because they are available and experienced in many issues (rather than a more appropriate area of Council which does not have duty officers available). A recent small (two week) sample of calls did not support this concern – only 4.6% of calls referred to duty officers were not planning and development issues. In any event, continuing regular communication and feedback between the teams should address these types of issues and improve outcomes for customers.</p> <p>The role of the Customer Service team has changed over time as lodgement of applications has moved from in person and paper based to online through the NSW Planning Portal with automatic integration of DAs into Council’s Property and Rating System.</p> <ul style="list-style-type: none"> Customer Service officers currently deal with applicants on incomplete or inadequate submissions (applications are rarely rejected), generate fees and charges and upload invoices into the Portal ready for payment. This takes somewhere between 35 and 70 hours per week depending on number of applications lodged. 	

- Given that they do not have technical expertise, there are no quality checks by Customer Service officers – they are generally checking that a document with an appropriate title exists in an application and requesting missing or incomplete documentation. Often an applicant may have had four or five interactions with Customer Service on their application creating the impression that it is satisfactory or complete when in fact no quality check has occurred.
- The quality checks are then done by both the assigned Planning Administrator and Planner/Certifier – who may then generate further 'requests for information'.
- This double handling of front-end lodgement without significant value should be further considered in the trial of a concierge service suggested above under 'Performance'.
- In short, unsatisfactory applications should not be accepted by Council but applicants should be provided better support to lodge quality documents which can be assessed efficiently. The Division will need to work closely with Customer Service on the concierge function particularly in relation to lodgement and resourcing. It is important that changes to lodgement do not increase the timeframes from submission to lodgement (this is being tracked and can be monitored on the NSW Planning Portal and council league tables).

Alignment of roles and responsibilities

There are several functions/services currently the responsibility of the Division that are not usually the responsibility of a statutory planning and building certification division. The Review has been advised that these functions have moved around Council directorates over time for a variety of reasons and the Division has sometimes taken responsibility when no funding or other resources have been found (sometimes with insufficient capability to do so). In summary, these are:

- Underground petroleum storage systems and management of potentially contaminated land (environment/regulatory function)
- Checking, issuing of, and maintaining data for section 10.7 planning certificates (strategic planning function)
- Updating of Development Control Plans (strategic planning or joint function)
- Trade waste and sewer inspections (enviro health officer or infrastructure function)
- Road and locality naming and renaming (infrastructure or GIS function).

The Review has taken the following approach to these functions/services:

- Determined current levels of risk to Council regarding legislative compliance or best practice management of issues.
- Working with other relevant areas of Council, prioritised review/audit or legal advice regarding those areas which pose a risk.
- Will develop plans to implement any changes required to address risk and determine resources required.
- Not made any recommendations regarding organisational responsibility for those functions/services until the future state and resources required are determined.

Level of resourcing required to meet stakeholders' expectations – business continuity and succession planning

The Review has worked closely with each Group in the Division to assess both capability and capacity to deliver the services required, particularly given the inability to recruit experienced resources in the current labour market and noting historical and predicted workloads. In summary, this analysis has determined:

• Planning Administration

- Resourcing of 10 FTE is about right, noting that there is currently funding for another one role in this Group and two vacancies.
- This level of administrative support is higher than many other councils, but it is an efficient and cost-effective way to provide services and allows the planners and certifiers to focus on assessments and determinations.
- The Coordinator's practice of ensuring all officers have the capability to deal with all applications accommodates leave (planned and unexpected) and ensures continuity of services, but also means that all officers are on the same grade and sometimes places significant pressure on less experienced officers. It takes about six months for a new officer to learn the systems and processes used in the group.
- The new Manager should continue to monitor workloads and resourcing levels with the Coordinator as the Review's recommendations are implemented.

• Building Certification

- Resourcing of 6 FTE including one cadet role is about right (particularly given a recent reduction in applications).
- Recent recruitment (using an external recruitment company based in Melbourne) of a Senior Building Surveyor with A1 or A2 commercial accreditation failed to produce any appropriate candidates. A plan to cover services and increase the accreditation levels of existing staff is at Attachment F.
- This Group has historically had in place agreements to share resources with other regional councils. However, these opportunities are currently limited or non-existent – many councils do not have sufficient staff and are recruiting. Further, consultants or contractors often also advise that they have too much work to assist. A local developer recently provided similar feedback to The Review - a large Sydney based certifier has too much work to come to Wagga Wagga.
- This Group should continue to invest in its cadet program and build relationships (and budget) to use consultants/contract resources where required.
- o Following the recent failure to recruit a senior building surveyor, a decision was made to use this funding to recruit a plumbing inspector (the current building surveyors are undertaking plumbing inspections but have minimum technical capability in this regard). The Division needs to work with Council's Sewer and Stormwater Group to ensure this new role is properly scoped and a decision on where this function should sit can be made. That decision requires consideration of the administrative tasks associated with plumbing inspections and s68 approvals – the Review's current view is that the Division's Planning Administration team is well placed to provide ongoing administrative support to a plumbing inspector regardless of where that function is placed within Council.
- Council should ensure that it does not duplicate administrative systems and create further 'single person risk'.

- **Development Assessment**

- Resourcing of 11 FTE (including one temporary resource, two currently working part-time and a business support officer for the Division) is about right, even though workloads are high.
- This Group currently has three cadet roles and only one qualified town planner who is not a senior planner. This ‘missing middle’ creates some risk for succession planning.
- Further one senior planner is currently focussed on assisting the Review, business improvement and establishment of a new concierge service.
- When a new manager is recruited and resourcing required for the concierge service is established, further consideration should be given to recruiting one or two qualified planners for this Group.

Some resources in other directorates required to provide planning, building and development services also appear to be limited which may cause delay (see referrals above). For example, external flood engineers are often required and Council’s capacity to provide environmental advice for assessments and in relation to contaminated land is limited. This should be further considered in relation to the use of consultants/contractors and roles/responsibilities.

Recommendation(s)	Management Response
<p>07 Resources</p> <ul style="list-style-type: none"> • Develop future focused plans and ensure continuous/agile management of staff levels with budget to use consultants/contractors where necessary. These plans should include leave arrangements, workloads, succession plans, management of ‘key or single person risk’ and aim to provide continuity of services. 	<p>Commenced</p>
<ul style="list-style-type: none"> • Continued focus on ensuring the Division is a great place to work with clear expectations and regular monitoring of performance; formalised and transparent flexible work policies and practices and good change management. 	<p>Commenced</p>

7.6 Additional current issues and opportunities within the Division to meet the objectives of the Review

Culture and approach to continuous improvement

The NSW planning system is universally acknowledged as complex. The Division has been criticised by some internal and external stakeholders for lacking a 'can do approach' and 'saying no first'. Most external stakeholders were not critical of individual staff when expressing concerns about the service they received. Many Division staff are also significant contributors to the Wagga Wagga community in their private lives and are conscious of the impact of their decisions on applicants and the community.

Staff are keen to point out that they have made many improvements to Council's services and their ways of operating often over many years. Internal consultation undertaken as part of the Review indicates that Division staff rate themselves highly on their supportive culture and teamwork, knowing what constitutes good performance and knowing how their work fits into the broader purpose and goals of Council. When working with the Division, Planning Ingenuity observed that the culture of the teams 'was one of professionalism, respect and comradery'.

In the most recent past, resources have been focussed on delivery of core services and there has been limited time to proactively address issues or ensure continuous improvement is undertaken. There are a number of risks or gaps that have been identified by the Division that require addressing to ensure compliance or best practice management of issues. These are outlined in Attachment K and the Division has begun developing and implementing plans to address these issues. This work will assist staff to be proactive rather than reactive in their ways of working. This needs to be a focus on the new manager of the Division.

Use of consultants/contractors

The Division has a history of, and currently uses, consultants (and to a lesser extent contractors) to supplement its services and provide additional technical expertise where required. This is a good model of service delivery as it allows flexibility in resourcing including ensuring that 'peaks and troughs' of workload are dealt with in a cost-effective manner. However, the cost of consultants/contractors has increased significantly over the last 12 months (the Review was advised that some cost increase has been driven by increased professional insurance costs). Companies and individuals are generally charging up to \$2400 per day. It is therefore essential that the scope of work to be undertaken is well-defined and the quality of output and cost of these resources is regularly monitored. There is also indication that the labour market is softening (unemployment rose to 4.2% in August 2024) – this should assist to increase the availability of all resources and drive down, or at least stabilise, pricing.

Alternative models of service delivery

Given timeframes and current resourcing, the Review has not considered in detail significant service delivery alternatives. The General Manager has flagged an opportunity for a group of councils to form a county council to provide planning and development services to a broader regional area. This model is made possible under the Local Government Act 1993 and works well for the provision of water supply including in the Riverina. This opportunity should be further explored with appropriate consultation, endorsement of the State Government and resources. It is a forward-thinking solution with the potential to ensure that the predicted growth in regional locations such as Wagga Wagga is supported with good planning and development resources and outcomes.

Recommendation(s)	Management Response
<p>08 Strategy</p> <ul style="list-style-type: none"> An annual strategy is developed for the Division (and refreshed each year) which focuses on 'problem solving' and 'good decision making' including a clear explanation of the challenges faced in providing the Division's services, an overall approach to overcoming those challenges and a small number of coherent actions that will address those challenges. This should complement existing business plans, the Service Review recommendations and allow staff to know where to focus their work each year. 	<p>Strategic Plan for FY 24/25 completed August 2024</p>
<p>09 Resources to address risks and best practice management of issues</p> <ul style="list-style-type: none"> The Division develops plans to address current risks in legislative compliance and best practice management of issues raised in the Review. Alignment of roles and responsibilities should then be determined in consultation with other directorates and the General Manager. 	<p>Commenced, noting:</p> <ul style="list-style-type: none"> Legal advice has been sought in relation to underground petroleum storage systems and management of potentially contaminated land. An audit of section 10.7 planning certificates will commence shortly.
<p>10 Alternate models of service delivery</p> <ul style="list-style-type: none"> At the discretion of the General Manager, further consideration is given to alternate models of service delivery, including the establishment of a county council for the provision of planning and development services to a broader regional area. To progress this opportunity, dedicated resources are needed to prepare a plan, ensure consultation and support from relevant stakeholders including the State Government. 	<p>Noted</p>

7.7 Financial considerations – Zero Based Budget including fees and charges

Fees and charges have been reviewed and benchmarked across similar councils by Council's Finance team. It was often difficult to determine whether fees covered 'like for like' services in this analysis. The average net cost of services for the Division for each of the previous three financial years was \$1.4million. In FY 23/24, the Division collected revenue of \$2,515,415 and total expenses were \$3,995,755. It has not been possible to benchmark these costs given the lack of consistency in council directorates and descriptions of services. Details of the Division's revenue and expenses over the previous three financial years together with a summary of fees and charges are at Attachment L.

In summary, this analysis has found:

- About 50% of fees and charges (by number and dollar value) are set out in legislation and Council has no discretion to change them. This includes fees for services such as development applications and modifications of consent, building information and s10.7 planning certificates.
- Some Council fees and charges are set on a sliding scale depending on development costs – this is consistent with practices in most councils.
- However more often than many other councils, Wagga Wagga often charges a standard rate for a service (not a sliding scale). These rates generally appear to be in the 'middle' of what others charge – this simplifies the understanding, invoicing and payment of fees and charges for users.
- There are some opportunities to charge fees to properly reflect costs to Council (for example, if a private certifier is terminated part way through a project and Council needs to take over the certification, fees and charges should appropriately reflect the amount of work required) or drive particular behaviours (for example, providing building information certificates for unauthorised works or requesting Council to provide historic information which requires significant time to locate and review when an applicant has already been provided the information previously). None of these opportunities are likely to create significant additional revenue.
- Some councils charge fees for providing planning and development advice (particularly written advice or pre-lodgement services). This can be viewed as inconsistent with good customer service and potentially a further barrier to growth and development but should be further reviewed as the new concierge service is developed.
- The Review uncovered some outstanding fees and charges (many historic) in relation to fire safety and inspections for construction certificates and complying development certificates. The process for reconciliation and responsibility for chasing debtors was unclear. This has now been resolved with the Finance team.

As processes are reviewed and a zero-based budget developed, discretionary fees and charges should be reviewed and any recommendation for increases referred to the General Manager. However, in the current environment (including a housing crisis) any increase in fees is likely to be a further barrier to development. In addition, operational efficiencies should reduce costs (or increase levels of service within current budgets) and there is no indication that further cost recovery of planning and development services is particularly required – the Division has been a significant contributor to Council's savings targets through vacant roles for a number of years.

Most complaints received about fees and charges are generally combined with complaints about customer experience and the standard of services more generally. If applicants receive 'good service', they are generally happy to pay. This supports actions to improve communication and customer

experience.

Stakeholders are sometimes confused between amounts charged by the State Government for the NSW Planning Portal and Council's fees and charges. Council's website should be reviewed to make sure these fees and charges are clear.

Recommendation(s)	Management Response
11 Budget <ul style="list-style-type: none">When the findings and recommendations of the Service Review have been accepted by Council, the Division works with the Finance team to build a zero- based budget commencing FY 25/26.	Supported

Attachments

- Attachment A Service Review Plan dated 24 May 2024
- Attachment B Service Summary Reports and Planning and Regulatory Services Customer Service Charter (Sept 2024)
- Attachment C Numbers and Timeframes - Applications over last three FYs
- Attachment D Organisational Structure dated 30 August 2024
- Attachment E Consultation Summary
- Attachment F Building Certification Accreditation Summary dated 30 August 2024
- Attachment G Evaluation of Duty Planning Services Pilot Program dated 31 July 2024
- Attachment H Summary of State Referral Timeframes
- Attachment I Summary of division and directorate structures in other councils
- Attachment J Benchmarking of salaries
- Attachment K Projects to address risks in legislative compliance or best practice management of issues
- Attachment L Finances, Fees, and Charges Summary FY 23/24