

21 January 2021

Mr Gino Cavallaro
Executive Director, ePlanning Program
Department of Planning, Industry and Environment
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Parramatta NSW 2150
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Dear Gino

Re: Ongoing issues with the operation of the Planning Portal creating significant additional and unnecessary red tape

We note the mandatory implementation of the Planning Portal for CDCs and post development certificates has now occurred.

Based on the experience of our members, the Planning Portal (the Portal) in its current form is creating an excessive regulatory burden on Registered Certifiers, has not been the subject of adequate industry consultation, and indeed does not appear to have even been adequately Beta tested. Put simply, the current system is unworkable.

This burden is already leading firms to have to employ additional administrative staff just to manage the Portal. This will result in delays and additional costs to be passed on to applicants. However, our observation is that the administrative burden on applicants is also unnecessarily complex.

Some of the issues with the Portal include:

1. The software seems unable to communicate between different processes within the Portal. This results in repeated examples of duplicated data entry steps.
 - a) Example 1 - The Principal Certifier (PC) appointment will ask for a Portal reference for CDC or CC. However, none of the data entered during the application process carries over to other aspects of the process.
 - b) Further to the above, the Portal treats the PC appointment process as applying for a certificate. You must enter all the details from the CDC again. At the conclusion of this step, you then must upload a PDF version of an actual appointment form. This is flawed as the applicant has just filled out the appointment form data on the Portal. The illogical part is that the applicant cannot access the uploaded data to print it until they have uploaded the PDF form.
 - c) Example 2 - The certifier is expected to upload Stamped Plans and Determination once they reach the approval stage of an application. This step then needs to be repeated when registering the statutory copy to the Portal as the Council will not have received a copy nor would they have received the \$36 payment.
 - d) Example 3 - You cannot link multiple CCs or CDCs to the same reference number, or even link the references so that the applications communicate with each other.
 - e) Example 4 - Each process generates a different Portal reference and it is difficult to link the processes together to understand if the projects are connected.

2. Auto generated emails and the Portal dashboard only contain an address and the planning Portal's allocated application number. For sites with multiple ongoing projects (e.g., shop fit outs in shopping centres) there is not enough data for certifiers to readily identify which specific project is the subject of the email. There is no "reference number" field when submitting an application, or other mechanism to link it to an existing project in the certifier's system. As well as requiring duplicate data entry this adds time to the certifier's administration processes to try and determine if it is a new or ongoing project.
3. As at 18 January 2021 the system was down which halted all approvals in NSW. Subsequently it appears to operate unstably.
4. Certifiers still need to manually send Notice of Commencement and appointment of PC forms to Council. The Portal does not appear to have that capability which again is more duplication.
5. There is a lot of redundant administrative work that repeats itself at multiple points during the application and lodgement process. In particular, it seems to require significant duplication of information that is also submitted via PDF. Examples include:
 - a) Existing and proposed fire-safety measures; and
 - b) Appointment of PC (See above and below).
6. The PC appointment can only occur after the CDC or CC is issued on the Portal – this has the potential to lead to illegal building work as the applicant may not understand that these are separate processes. The common method is that the application and appointment are applied for at the one time and approved at one time by the certifier. There is no reason to wait till after the CC/CDC is issued to make the appointment. Further, it again results in duplicate data entry.
7. Inappropriate data entry requests – there are a range of data issues which should fall on the applicant to complete, not the certifier. In some cases, this cannot be answered by the certifier or could create a potential conflict for the certifier. For example – requests for information around costs of work, asbestos material, confirmation of area of building etc (noting that this is an ambiguous request in the case of an alteration to an existing building), and ABS data.
8. The portal makes numerous other data requests of the certifier that are time-consuming, irrelevant or not appropriate. These include the development consent, which is already in the system, and the certifier's cost agreement, which is not a statutory document and is confidential.
9. The AAC queries whether in fact the ABS Data is relevant or actually even collected by ABS. There has been no evidence that this information has ever been harvested and it appears it simply add time and complexity for no reason.
10. The Portal requires a series of declarations from the certifier. However, the certifiers are not the ones interfacing with the Portal – this is handled by administrative staff. Furthermore, the declarations reflect a small and seemingly random selection of certifier's actual statutory obligations. Certifier's obligations are enshrined in law and prevent the issue of a certificate. They are generally reflected in certifier's own quality assurance processes. It adds time and complexity and indeed is somewhat patronising to make this sub-set of legal obligations the subject of declarations on the Portal. In addition, the declaration requiring the certifier to say "I have inspected the site" is incorrect as this is not a statutory requirement.

11. Administrative staff do not have the same user privileges as the certifiers, hence apparently cannot legally register certificates on behalf of the certifiers.
12. The application module is loaded with jargon and is heavily weighted toward domestic and multi-residential construction. There are a lot of redundant fields requiring null data entry for commercial applications.
13. Applications for large projects involve significant uploading of files. These usually involve significant modifications to the application inputs as part of the assessment process. The Portal appears to have no meaningful way of dealing with this in a way that is intuitive, or remotely user friendly, for either applicants or certifiers. The outcome will quite likely be that to operate with any degree of efficiency, certifiers will have to run two parallel applications, a trial one outside the system and then another inside the system. These workarounds will create even more duplication than currently exists.
14. There seems to be no way of managing staged approvals in the system.
15. The Portal does not allow batch downloading of application documents into a zip folder. Each folder must be downloaded individually. This contrasts sharply with all modern project / document management portals such as Aconex, which have tick boxes to the left of each document with functionality that allows batch downloading in zip folders. This may not be a huge issue for housing applications with 4 -6 drawings, but commercial projects with hundreds or thousands of drawings, the Portal is simply not commercial.
16. CDC Application - In the documents tab an auto generated form titled "Generated lodged CDC Form" is listed as generated by the user, when in fact this is auto generated. This needs to be changed.
17. No ability to delete or cancel certificate applications/registrations once they commence.
18. No ability for the certifiers to log into a test server to review the application process from the point of view of the applicant to better understand how the system works.
19. Auto generated notification emails occur each time a document is uploaded (after PC appointment), 100 documents uploaded equals 100 emails.
20. The fee to lodge a certificate ends up being \$36.15 after transaction fees are added. The legislation requires the fee to be not more than \$36. (Section 263).
21. The Portal has an upload limit of a size which does not match commercial applications.
22. The Portal has a hold point on each page which does not allow for transitions backwards and forwards. Instead, the process stalls until all information required by a particular page is provided. Further, there is no ability to return to an earlier page.
23. Common certification software providers such as BCS and Visual Approvals (which appear to serve the bulk of the private sector) have not been given time or adequate information to permit integration with the Portal. This is resulting in additional duplication internally to that identified above.

We therefore recommend that the current complicated interface be substantially replaced with a much simpler version with the following key characteristics:

- A. Reduce the amount of data collection to the necessary minimum.

- B. Ensure that the certifier is not entering data that should be entered by the applicant.
- C. Emails generated by the system need to be significantly rationalised and include appropriate user reference data so different projects can be identified.
- D. Ensure that applications on the same project are cross referenced for both applicant and certifier, and that fields pre-populate wherever possible.
- E. Appointment of PC should integrate with the application for the relevant certificate.
- F. Appointment of PC and Notice of Commencement should automatically be sent to Council without requiring the forms to be extracted from the system and sent manually.
- G. Remove the redundant certifier declarations.
- H. The Portal should not require the uploading of forms that mimic the same information that the applicant is entering via the application fields, unless the Portal allows that data to be used on a form with the ability for the applicant to print for signing, scanning, and uploading.
- I. The Portal should not replace, or worse, inefficiently duplicate the user-friendly processes that have been developed and refined by industry over two decades of process improvement and innovation.
- J. The immediate introduction of APIs and the training required for their implementation.
- K. The system could readily be re-designed in a way that recognises that approval documentation is necessarily uploaded by certifiers once approvals are issued, instead of requiring this documentation to be uploaded on the Portal. This would avoid duplication as well as significantly lessen the administrative burden imposed by the Portal in the assessment and determination phases.

In short, the Portal ignores the fact that industry has developed mature systems to manage these application and appointment processes, and this new approach does not speak to these existing systems in any intuitive way. For the most part, the existing mature systems are not replaced by the new Portal but are in fact duplicated in it, meaning the lack of compatibility is currently leading to significant and unnecessary duplication and delays in determination times.

Initial discussions with the AAC regarding the introduction of portal promised the development of Application Programming Interfaces (API) to allow certifiers with developed IT systems to process applications in the usual manner and to upload the data required by Government through APIs developed in conjunction with industry.

The industry is still awaiting the implementation of these APIs, albeit we note that APIs have recently been published on the Portal website, however, further discussion needs to take place to train certifiers and further develop systems to allow for their implementation.

The initial ad-hoc feedback from our members is that in its current form, the Portal will impose an additional resource burden of approximately one full-time administrative staff member per 10 technical staff. This is not acceptable in an era where Information Technology should be used to streamline processes.

Further, the Portal seems to operate without any meaningful understanding of the *Building and Development Certifiers Act 2018* and the *Building and Development Certifiers Regulation 2020*.

We note this letter follows extensive feedback provided to the Department of Planning, Industry and Environment (DPIE) in September last year, which included survey responses from AAC members based on beta usage of the system. This feedback has clearly been ignored. I have again attached this information, noting that our more recent feedback is more accurate as certifiers now have live projects in the system. However, neither the feedback provided in the dot points above or in the earlier survey feedback are exhaustive.

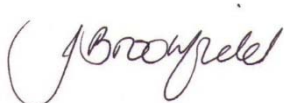
In conclusion, we are extremely disappointed that whatever consultation has occurred with industry appears to have either been completely inadequate or else the outcomes of that consultation ignored.

As a result, in its current form the Portal adds significant red tape and administrative burden to the entire process, leading to longer waiting times and higher costs, and fails the NSW Government's commitment to reduce unnecessary regulatory imposts on businesses.

The mandatory use of the system must be immediately delayed until it has been properly researched, updated and tested at least as we recommend above, noting that there are likely to be further issues identified.

The Association of Australian Certifiers would also be happy to discuss this matter further with you.

Yours sincerely

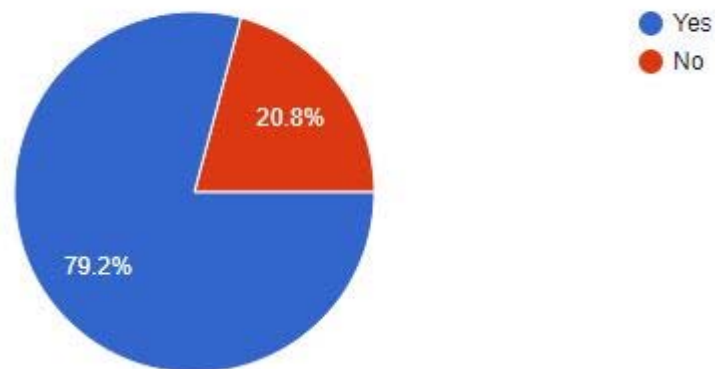


Jill Brookfield
Chief Executive Officer

Planning Portal - AAC Survey Feedback

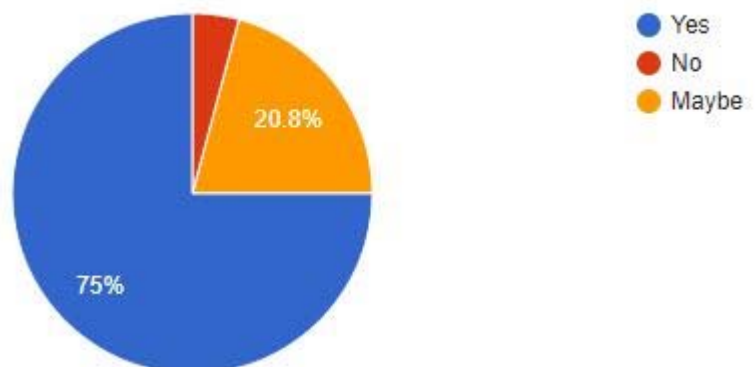
Responses: 49

1. Have you attended training provided by Dept of Planning & Environment (DPE) on using the Planning Portal (Portal)?



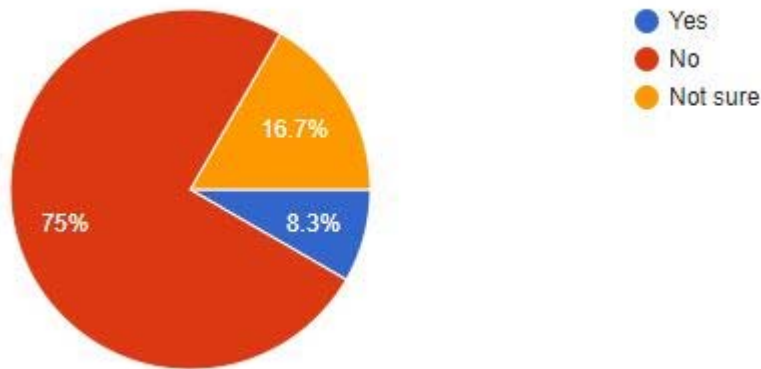
ANSWER CHOICES	RESPONSES	
Yes	79.2%	38
No	20.8%	10
TOTAL		

2. Would you attend any future training sessions on the portal if DPE were to put them on?



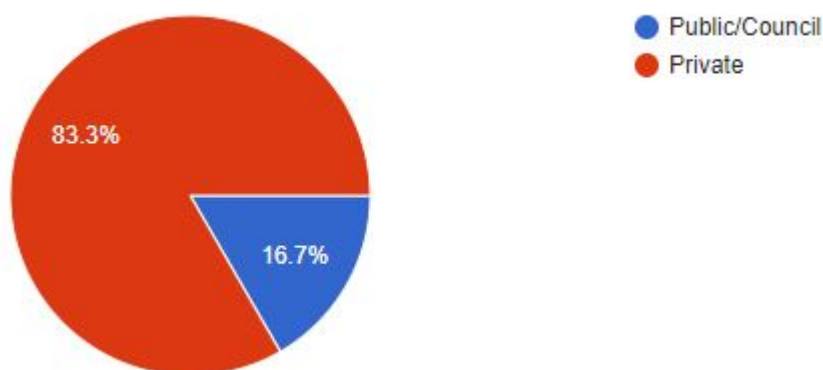
ANSWER CHOICES	RESPONSES	
Yes	75%	36
No	4.2%	2
Maybe	20.8%	10
TOTAL		

3. Do you think the DPE has provided sufficient information to you on the Portal?



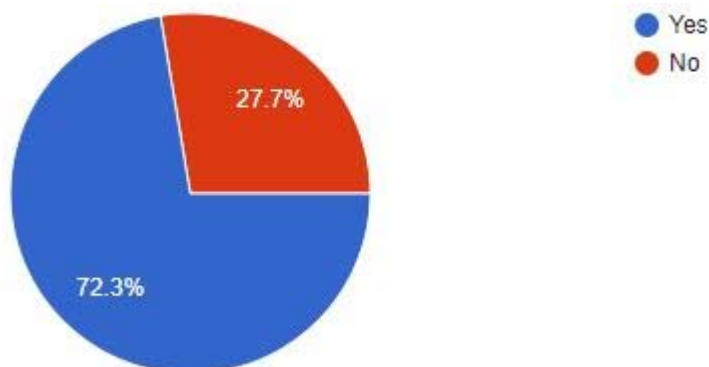
ANSWER CHOICES	RESPONSES	
Yes	8.3%	4
No	75%	36
Not sure	16.7%	8
TOTAL		

4. In which sector do you work in?



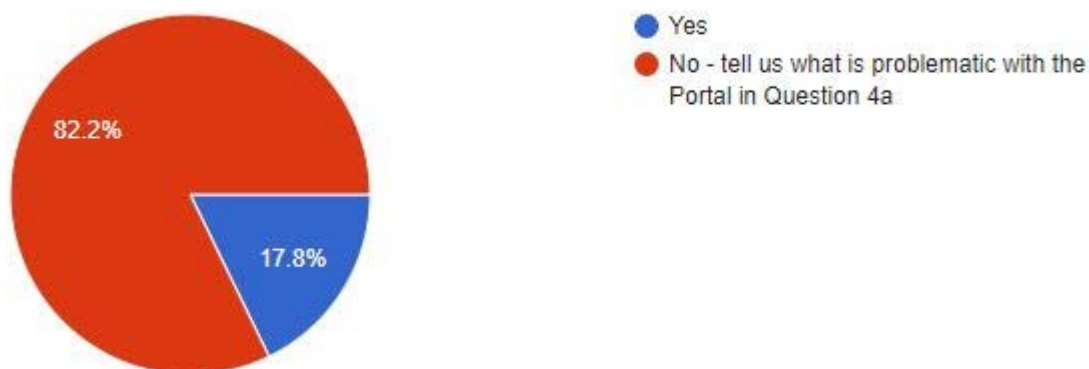
ANSWER CHOICES	RESPONSES	
Public/Council	16.7%	8
Private	83.3%	40
TOTAL		

5. Have you started to use the Planning Portal?



ANSWER CHOICES	RESPONSES	
Yes	72.3%	34
No	27.7%	13
TOTAL		

6. Have you found the Planning Portal easy to use?



ANSWER CHOICES	RESPONSES	
Yes	17.8%	7
No	82.2%	38
TOTAL		

6a. If you answered 'No' to Question 6, please describe why you don't think the Portal is easy to use.

#	COMMENTS
1.	The mandatory list of documents has not been set up properly and is unrealistic. it has not been set up for the certification process.
2.	too many requests for irrelevant information or information that doesn't apply or that - in case of submitting registrations questions that cannot be answered properly, eg - "when was the certificate advertised?"

3.	It is adding too many steps to the Certification process. We are having to spend more time completing administrative tasks than performing actual certification work.
4.	The user interface is not straight forward, and on the spot support is difficult to obtain, making using the already laborious system even more time consuming.
5.	Some documents are not mandatory under legislation, but are required in the portal. We are having to upload blank documents (at the advice of DPE) to get around this. Incredibly repetitive and time consuming. We receive numerous emails per application which is frustrating and unnecessary.
6.	Time consuming
7.	Inability to set up staff as certifiers (must be done by the Dept), Inability to search approvals across an organisation where more than one certifier, List of Councils using portal is incorrect (we proceed to stage 3 of entry before portal advises that Council is not connected to portal), Inability to delete jobs logged but Council does not accept, Users cannot save data if another person is using the same login and there is no notification that data will not be saved until all the data has been entered (approx. 15 mins worth of work)
8.	portal has irrelevant questions to certain development that must be checked before going forward. also the payment systems don't integrate with councils. even though council say they work. Should have been beta tested for longer rather than private certifiers wasting time finding the bugs in the system. Also having to check box statements at the end when the system is clearly incorrect so we can lodge the jobs.
9.	Everything. The system doesn't sync with our existing software so everything needs to be double handled and manually re-entered within the portal despite already being done within our own software. applicants still have no idea how to use the system and we are having to sit on the phone holding every applicants hand on how to use the system and just as important, how to select us as the certifier. This selection process is an absolute joke. You can get stuck on the first page very easily and be forced to enter an ABN. Mum and dad applicants aren't companies and just don't understand this part Listing the certifiers in alphabetical order is not good. You should have to enter the company details in full and not be able to see all the other certifiers.
10.	Needs to be more simpler and basic. Just Upload files and send - individually uploading documents - Glitches in the system - At uploading documents. It requires us to upload fire safety schedule. This is not applicable for residential
11.	I have had great difficulty logging-on to the portal. They can't even tell me whether I have been set up correctly. It has taken about 6 weeks and still not resolved.
12.	There are so many functions that need to be completed, without a manual it is ripe for errors. I asked if any training was to be provided for applicants and they said no. We're flat out understanding it ourselves let alone providing training on behalf of the govt
13.	I can log on but with no work through it at this stage how do I know if it's easy to use? I have contacted many clients and no-one has any idea that it exists for application lodgement and no-one is interested in using it. I have done the 2 hour training but without having applied that to a real application I'm starting from scratch again.
14.	I notice that there are no records being entered by the LGA's we deal with so I have not examined the portal in any great detail and therefore I have no "reference" point.
15.	It asks for information that is not applicable, such as a Fire Safety schedule for a Class 1a, it is too case sensitive on the address details, and where a Council is not linked with the portal there should be an updated list so that we don't waste time trying to lodge certificates that isn't linked.
16.	- Applications have become overly complicated with Double handling. - Applicants have too much control over their application and can restart application times and update their application to in process without providing all outstanding information.

	-Needs to have a process whereby DA & CC can be lodged on the same PAN.
17.	Does not allow concurrent DA & Construction Certificate lodgement, to enable concurrent assessment. DA's should have the option to include CC to enable concurrent assessment similar to Complying Development Certificate. Difficult to track multiple applications status' do not automatically update when information received.
18.	It is requesting documents that are not required under Legislation - Fire Safety Schedule for a Class 1 & 10 Building. No way to delete a part completed lodgement . The FAQ don't relate to anything worth while for using the portal.
19.	More hoops to jump through continually making everything more complicated and difficult. Increasing workload on councils and immense pressure on assessing officers.
20.	NOT ALL COUNCILS CAN PROCESS PAYMENTS UNTIL THIS IS RESOLVED I WON'T BE USING THE PORTAL
21.	The portal does not cater for all types of development. It requests data that is irrelevant to the approved works, but will not allow you to continue with the lodgement process. The field to completed for the builder are incorrect. How do you enter a building company name where only first and last name have been requested.
22.	<ul style="list-style-type: none"> - Very slow to upload multiple items (ie, drag & drop) which increases admin time on each project. - The portal needs to clearly state which Councils are accepting Certificates entered through the portal rather than get half way through and then cannot delete the entry. eg. Hornsby Council are only accepting online lodgements whilst most other Councils are not. Where a Certifier submits a CD copy of the CDC to Hornsby Council, they are not accepting it. The legislation doesn't specify that we can't send a posted copy of the CDC to Council. - I have also started entering applications into the Portal only to be advised that the Council is not accepting, then cannot delete so I have had to amend the entry when entering another project. - Certifiers should be able to delete files in the above situation where a Council is not accepting Certificates through the Portal - Have not received an application through the Planning Portal but apparently for a demolition only CDC, it is asking for structural engineer plans & Statement of Environmental Effects which are not mandatory items for a demolition only CDC. - Planning Portal requires re-entering all the information in again which we have already entered (double handling). - For smaller Certifiers who are not using BCS, the Certifier has to enter data into their own system, Certability (BPB data reporting) & Planning Portal which adds a lot of unpaid admin work to every job. I am using BCS now, so hoping that it will integrate with Planning Portal.
23.	System is predicated on suburban scale development and is cumbersome for major projects with multiplicity of documentation
24.	There are so many functions that need to be completed, without a manual it is ripe for errors. I asked if any training was to be provided for applicants and they said no. We're flat out understanding it ourselves let alone providing training on behalf of the govt
25.	Too complex and not workable for major projects.
26.	The portal is not geared up to handle major projects. Too tedious and impractical for feeding information into the system. The ePortal should only be used to track DA's and for private registered certifiers to report on mandatory inspections that have been carried out and registration of their approval documents.
27.	For complying development you have to conduct a full assessment of all information and the applicant has to provide all plans and information for assessment when the property might be for instance in a Flame Zone or have another constraints that knocks it out. It is a waste of time and money for everyone involved. There is also double handling to put all your inspections in there when we already do this with BCS software.
28.	It is doubling the workload and doubling Certificate Registration
29.	1. We need an option to delete jobs entered where registration was not completed. (see 7a 3. for more information)

	<p>2. Not all councils accept approvals via the portal, but you need to enter several pages of information before the portal tells you this.</p> <p>3. We require more information regarding the difference between active and completed jobs in the portal. Are all registrations completed once processed by Council? Why do we have a large number of jobs still sitting in the Active folder if this is the case. And why are some jobs moved to the completed file not long after payment has been accepted.</p>
30.	<p>The portal itself appears to be straight forward however there are a few things that we get "hung up" on and cannot proceed until the information is "satisfied".</p> <p>a) Project Address. If it does not appear in the "drop down" box and we cannot locate it with a deep search - we are unable to proceed. This is extremely frustrating especially for those Councils that do not accept it any other way like hard copy. It has been particularly noticeable especially for properties that have become "new suburbs" for example. Sometimes our projects are just a Lot number and street name- the street being a newly constructed street, and we are unable to progress. This system MUST have a place where if the portal doesn't recognise an address we can just add it as per our Construction Certificate, then proceed/continue.</p> <p>b) We have found that a number of Council's have not caught up with the latest "technology" and the wording that comes up is: "The address you have entered is within a LGA which has not been mandated by the EP&A Reg 2000 to use the Planning Portal for accepting online DA's as of 1st July 2020 or has not yet voluntarily commenced use of the NSW Planning Portal.". Why is this so??? This is especially annoying for Council's that "only accept online submissions". Unacceptable. Why is it that EVERY LGA NOT BEEN SET UP PRIOR TO 1/07/20. IE: The address of a project we were submitting a CC for - the address appeared in the drop down box, but then we could not proceed as Canterbury-Bankstown Council was not set up yet. PLEASE SORT THIS ISSUE OUT AS SOON AS POSSIBLE. It is extremely frustrating and time wasting after filling in all the fields.</p>
31.	<p>Poor format. Ask for the same data to be input multiple times. Technical issues with entering property addresses which do not appear on the pre-generated list. Portal requires documentation to be submitted that may not apply to the project (i.e. Fire Safety Schedule).</p>
32.	<p>Customers can upload whatever they like and the quality of plans and information is poor. Mum and Dad type applicants may have never lodged an application before and previously would have come to Council's customer service centre to seek advice/assistance and have their plans reviewed checked for lodgement. This is no longer occurring like it did. Furthermore there is no trigger to advise them they need a CC. We have had numerous circumstances where a DA has been lodged and approved and the owner has then called to let us know they are ready to commence or to provide builders details and we have had to inform them they need a CC. There is no trigger in the portal after a DA is lodged to advise them they need a CC or ask them if they would like to apply for one at that point - not good enough. This is poor customer service and will lead (and has lead to) unauthorised works. Project builders have also had many problems with lodgement. They have advised the system is not user friendly and can take up between 30-60 min to lodge one application. Again not good enough. The system has numerous flaws and little has been done to rectify this situation even when its reported to the Department</p>
33.	<p>It asks for documents that are N/A and wont let you proceed to you upload them</p>
34.	<p>We can't find where as a certifier how to log in as a certifier - every time we log in it treats us like we are lodging an application , need more assistance on how to access the certifier portal to receive applications and none of the Assistance documentation online is targeted at certifiers, only for applicants</p>
35.	<p>The lodging of an application is not clear for mum and dad applicants. There is no information provided to the applicant as to what plans or documents are required. i.e no reference to Schedule 1 of EP&A Act.</p> <p>Applicants are not aware at any point in the process that a Construction Certificate is required, and our Council has lost a lot of Certification work due to the portal. We now have less than 50% of the certification market which we have always previously been well above 50%.</p> <p>Our previous return certification customers have advised the reason they have moved to the private sector is because of the planning portal and how hard it makes the process, having to</p>

submit separate applications for DA, CC, PC Agreements and OC has made the process very difficult.
I feel the planning portal needed a lot more work and consultation before it was pushed out to Council's to use. The Planning portal has now made our Council non-competitive in the Certification market.

7. Has using the Platform increased your workload?



ANSWER CHOICES	RESPONSES	
Yes	86.7%	39
No	13.3%	6
TOTAL		

7a. Describe how the Platform has affected your workload.

#	COMMENT
1.	It increases the work load by about 30min for each file.
2.	Doubling up on information entered, emails clogging up email client, rubbish applications that can't be vetted prior to application.
3.	We are double handling applications. Completing Certification work using our own software then re-typing or submitting information again into the portal. Extra time explaining the process to clients who do not understand how to use the system or unable to use a computer. Having to manage projects in our own systems along with within the planning portal. I have found no time saving elements by using the portal.
4.	Our certification software (Visual Approvals) already does everything the planning portal already does and asks for the same data input. The Portal has doubled the workload in regards to data entry (as the same data has to be input twice)
5.	Increased admin work and therefore running costs, which we have already started to pass on to the consumer.
6.	Time consuming - Admin takes over double the time to register certificates
7.	We already had an electronic submission platform for our company. We now have to download documents submitted to the portal and then register to our own database.
8.	Searching, massive backlog of work to be entered due to errors with system, Takes a lot more time that just sending Council and email, Too many mandatory fields
9.	System doesn't accept addresses all the time. LGA not coming up

10.	Applications through the portal are deferred until July 2021 for certifiers, however we are being forced to lodge all CDC, CC and OC's with Council through the portal. Because the portal is not synced to our software, we are having to spend time manually entering all the data into the portal again, which would otherwise not be required and double handling and processing. We have not been accepting applications through the portal due to all the other issues and no ability to sync with our software. Otherwise our time spend processing an approval would be 10 fold.
11.	Prepare documents for the portal & spend 30 min to upload a file and make payments. Very hard for a sole trader or small business with more workload added. Will need to reduce work and income. So much duplication in work i.e. Data reporting, certifiers own records and files on computer
12.	Doubling up of data entry.
13.	Training all our clients on how to use the system has been very time consuming
14.	Again how do I know? No doubt it will significantly increase workload
15.	Although not using the platform there will be additional duplication of data and documents required to be added to now a third government agency... 1-Council, 2-Department of Fair Trading, 3-DOP Planning Portal
16.	Takes a lot more time to lodge, and it asks a lot for information that the Council would also be recording, causing doubling up in process.
17.	- Applications have become overly complicated with Double handling. Applications and Additional Information has to be lodged on the portal and then updated and duplicated again on Council's Records. - All processes have to be updated 2 times. - Needs to have a process whereby DA & CC can be lodged on the same PAN. - Applicants are able to update tracking when all additional information has not been provided. Need to update the portal multiple times due to applicants restarting stop the clock and by providing insufficient additional information.
18.	Double up workload alongside Council's existing platform.
19.	Manual typing in of lots of info, single uploads of documents and naming, where as if the BCS office system connected with the portal the same as the BPB mandatory reporting it would be sweet. Really annoying that only some Councils are accepting post certificates at the current time.
20.	Consistently making the system more difficult for Development Assessment officers.
21.	DUPLICATION OF DATA ENTRY AND DATA REPORTING
22.	The portal has added approximately 30-45 minutes of work for each approval to be lodged. It is re-entering the data we have entered on our systems to generate the approval. We are having to re-enter all the information, along with uploading all the documentation. After all that we are still paying a lodgement fee.
23.	Re-entering information into BCS & Planning Portal increases the workload with no benefit to the Certifier, but obviously saves Council time. We still have to pay the \$36 registration fee to Council even though we are now having to do the work of registering the file.
24.	Requires multiple iterations to retrieve, process and upload material
25.	Training all our clients on how to use the system has been very time consuming
26.	The mapping I found OK but with regards Greenfield sites, It doesn't show on maps so I revert back to the Greenfield area maps which are not the best either.
27.	All data entry, helping majority of applicants to get access and complete the information. Most applicants are not capable of even completing a simple CC or CDC form. While increase to all certifiers insurance premium has been a big impact on our company we cannot afford to have another staff to look after this new requirements.
28.	Adds an extra 10 minutes to the workload per certificate issued.

8. What improvements would you suggest that would make the Portal easier to use? List your suggestions.

#	COMMENT
1.	Have the mandatory documents required reviewed by a certifier not a town planner.
2.	Integration with software platforms
3.	Improve the user interface! Be more co-operative with certification software providers who were not involved in the development process at all, but can potentially provide for communication between the program and the planning portal so data entry only needs to be completed once!
4.	1. For the portals inspection recording system to be useful to certifiers of either private or Council background it needs to talk to the database that is recording the inspection reports that we are uploading otherwise it represents just another double handling of information. 2. The inspection part of the portal should be developed into an app as logging into and using a website on a phone is not practical.
5.	Make the portal less repetitive the portal does not reference our certificate numbers in any correspondence. We are having to search internally by address to find specific jobs in our system.
6.	Uploading of Documentation to be a smoother process
7.	Less mandatory fields, more than one user can use single login, remove councils who don't use portal, anything to resolve the issues identified above
8.	bin it and go back to the standard lodgements we do direct to councils portal.
9.	Provide automatic connection with the main software programs certifiers are using.
10.	Upload all CC , CDC or OC documents with one attachments not individually Make this not mandatory for certifiers and option. Data reporting should be integrated
11.	User manual, help guides for the process, training
12.	Get back to you in January when we start using it.
13.	Allow critical stage inspections and pre-approval inspections to be recorded in the portal.
14.	Unable to comment until we use it
15.	Mimic the eportal that Liverpool Council has
16.	- Needs to have a process whereby DA & CC can be lodged on the same PAN.
17.	Concurrent DA & CC lodgement to enable fast tracking. DA's should have the option to include CC to enable concurrent assessment similar to Complying Development Certificate.
18.	BCS and or other certifier system must be able to talk to the Portal so no duplication of typing in info (possible mistakes).
19.	Department of planning assessing every application on lodgement to ensure all information is accurate and fit for assessment.
20.	ALLOW LODGEMENT VIA THE PORTAL TO BE ACCEPTED UNDER LEGISLATION TO SATISFY (1) DATA REPORTING OBLIGATIONS AND (2) RECORD KEEPING OBLIGATIONS TO MAKE DUPLICATION OF PROCESSES REDUNDANT. FORCE COUNCILS TO ACCEPT PAYMENTS VIA THE PORTAL
21.	The ability for a private certifier to select a DA and have the information of the applicant, the development address, DA number, approved date pre-filled.
22.	- Tested integration with BCS and other Certification software is essential and should have been organised by now. - I think there should be a test account where Certifiers can see what documents applicants are having to provide as it is a bit of an unknown. - Certifiers should be provided with information (a list) of exactly which documentation is mandatory for each type of application in the portal so that we can advise clients what they will need to provide.

23.	Would be appropriate to use portal for logging of initial lodgement of applications, determinations and key documents NOT every single interaction between applicant and Certifier
24.	User manual, help guides for the process, training
25.	Tried to register for training but the registration form would not accept my accreditation / registration number. This needs to be fixed
26.	We refuse to use this platform in this shape and form. Talking to other certifiers it appears most of them are happy to lodge the determined CDC, CC and OC approvals with all supporting documents with Council or consent authority in the platform. However they must make changes to platform to allow upload of many documents in form of drag and drop at the same time.
27.	Ability to enter multiple DA's, remove character limits on certificate numbers, page to automatically move to payment section rather than having to scroll down to make payment
28.	As suggested above, the ePortal should only be used to track DA's and registration of approval documents issued by registered certifiers and reporting on mandatory inspections
29.	Integrate it with BCS software and ask the applicant to do a self assessment of the land constraints before just lodging the doomed CDC application.
30.	Portal should allow owners to seek assistance from private certifiers for lodgement, a proper trial of the private certification section of the portal should have been undertaken and duplication needs to cease.
31.	<ol style="list-style-type: none"> 1. We need to be able to work in the portal with more than one person. At the moment no more than one admin officer can log into our portal account. Can this be changed or will we need to create multiple accounts for the same certifier. All jobs should still be available in the main account. 2. After paying the registration fee we receive a receipt by email, however this receipt does not specify which job it relates to. Even the receipt number does not correspond to the job lodged. When multiple jobs are lodged and receipts emailed to the admin email address, we won't be able to know which receipt goes with which job number. 3. We need an option to delete jobs entered that were a trial or only set up partly due to Council not using the portal. This is only identified on page 3. 4. Can the portal please also identify the certifiers reference number or CDC/CC/OC number in active and completed jobs, not just the planning portal number. 5. We've had an OC being declined by Blacktown Council advising a CDC had already been lodged. Payment went through and has not been refunded. The OC is not a CDC so should have been accepted. We need Council to email us or call us with reasons for declining it. How can the system now be updated to advise the OC issued. We will not lodge it again as it would mean needing to pay for registration twice. 6. We've lodge an OC and payment was accepted, however the job only appears in recent work as registered, but is not in active or completed jobs. So there does not seem to be an official record for it. There could be more of these but we have not yet had the time to go through all the lodgment numbers.
32.	<ol style="list-style-type: none"> a) If the address we are entering is not identified by the portal, we need a space to enter the address of our Construction Certificate and proceed to lodge it. As this is eventually going to be the mandatory way to lodge Certificates with Council, there are far too many "hiccups" where we are unable to proceed if the system does not recognise our project address etc. b) Why is all the information required to be entered in the fields such as Applicant name, address, date works proposed to commence (what date goes here? Date of 48 hrs after date of CC issue)? To what purpose is this? All the information is provided on the Construction Certificate being lodged.
33.	API keys to link the data between the portal and BCS/Visual Approvals to save certifiers all the extra admin work. Otherwise a complete overhaul of the system.
34.	Too numerous to list. Customer Service is certainly not the focus. I have not had one customer who liked the system and we have been using this system full time since January. Project Builders hate it.

35.	Change the Mandatory documents or give the option to state they are not applicable
36.	Make it clear and mandatory that when lodging documents split up as required (ie Architecturals, Engineering, Final Fire Safety Certificates etc) they are uploaded separately not just re uploading the whole document again and again which is occurring now.
37.	Better training, not having to enter all your details each time you start a new job
38.	Provide more FAQ documentation for certifiers on the use of the portal, how to find applications lodged etc
39.	<ul style="list-style-type: none"> - More information provided for applicants on the portal. (ie. what plans are required for different developments) - Further information provided for the application regarding construction certificates. - Being able to lodge applications as combined DA/CC rather than two separate applications. - Applicants to be able to remove documents prior to Council accepting application for lodgement. So that documents that are not accepted as part of the lodgement are not submitted or accepted.

9. Final comments - are there other specific issues about the Planning Portal you would like us to forward to the DPE?

#	COMMENTS
1.	Yes the list of Council's involved is not updated on the portal and is inconsistent with which council are involved.
2.	Too complicated to use.
3.	Nothing more than what is mention in Question 8.
4.	<p>1. DPE need to tailor and run training seminars targeted to administration staff who will use the platform as much as, if not more than, certifiers.</p> <p>2. Additional training sessions are really needed for everyone as training in August will be long forgotten before we will have the option to use it in December and even more so long before the portal becomes mandatory in mid-2021.</p> <p>3. The portal needs to reflect the requirements of the legislation particularly in relation to payments for applications. Ie it was advised at our training session that the checkbox in relation to payment did not matter and that you didn't have to get payment until after the approval was even issued which does not meet the legislation requirements.</p> <p>4. The DPE needs to run training sessions or provide publications promoting this system to the HIA, MBA, BDA and RAIA as their members will be using the portal for the lodgement of applications. Otherwise the certifiers will be the ones educating the public about it which is not reasonable or practical.</p>
5.	The portal and mandatory data reporting should be integrated. We are having to spend ludicrous amounts of admin time reporting and using the portal, and we are entering the same information over and over (and over) again.
6.	n/a
7.	All of the above
8.	Can we charge them an hourly rate to figure out workarounds, calling councils etc for a system that is not working
9.	Applicants just don't know how to lodge applications through the portal. It's a nightmare.
10.	<p>Needs to be very simple and basic - Upload files and send</p> <p>More training and a direct support line for council and private only for a few months</p> <p>Make this not mandatory for private certifiers and option.</p> <p>Also when is the cut off dates for any hand written applications from clients for CC, CDC and OC. Which is then approved and sent to council via mail (post) ?</p> <p>Have read the EPA Reg 296 transnational provision and it's not clear.</p> <p>So much duplication ie. Data reporting, certifiers own records and file on computer</p>

11.	There should be a specific support line for certifiers.
12.	We still have to use CertAbility to do double entry of all certificates and inspections
13.	The Department could start by engaging with the initial users ie the development industry including architects, builders, planners etc who will be lodging applications. In my conversations none of these groups have engaged with the on-line lodgement part of the portal as yet an generally there is no awareness of the changes. Seriously, it's going to be a disaster January next year!
14.	Google Maps are out of date. Country Internet Connection Speed is an unavoidable issue for small operators and we have Lagging issues with several government databases - e.g. swimming pool register
15.	More training, and allow for a period to practice on it so that users can get used to it.
16.	- Applicants need to have less input on the process and have a mechanism that permits assessment of Additional Information prior to update of Portal.
17.	Yes it needs a dedicated person to answer the phone who understands the legal ramifications of what Certifiers do, not just a general customer service person. Certifiers could lose their accreditation sorry registration for loading documents up incorrectly.
18.	Stop creating more work for assessing officers
19.	The process is extremely tedious. In a climate where businesses are struggling financially especially during this pandemic, it has created additional work for the certifiers where they are already under extreme pressures to ensure they have done all their due diligence with every approval, only for them to spend extra time re-entering all the data. This could also be an admin function, however again adding the financial strain of hiring staff to complete this lengthy process.
20.	Planning Portal should not become mandatory for all applications, including CDC's to Certifiers until there is a working integration with certification software such as BCS.
21.	Private certification industry is expected to fund the administrative cost of using the portal. This is unwelcome and unwanted at a time when COVID induced recession and PI insurance crisis already threaten the viability of the sector
22.	We still have to use CertAbility to do double entry of all certificates and inspections
23.	No, great concept but as a profession we need be have assurances that we can rely on the information provided,
24.	Talking to other certifiers it appears most of them are happy to lodge the determined CDC, CC and OC approvals with all supporting documents with Council or consent authority in the platform. However they must make changes to platform to allow upload of many documents in form of drag and drop at the same time. We cannot afford anymore additional expenses. We cannot be a dumping ground for everyone anymore. I am hoping this matter is going to be looked after by AAC as a priority.
25.	As suggested above, the ePortal should only be used to track DA's and registration of approval documents issued by registered certifiers and reporting on mandatory inspections
26.	I will avoid using it as much as possible until they fix these issues.
27.	The portal is not working properly for Private Certifiers and the help line is almost non existent or takes 3-4 days for a call back delaying work completion.
28.	<ol style="list-style-type: none"> 1. At the moment it works well where we're lodging the CDC's and CC's on the portal at approval stage, using the documents provided to us. This is working well. We hope these type of registrations will continue to be available. 2. Request for Certificate Details. I assume this is the OC Certificate details not the CC certificate details requested. Please confirm. 4. How long should jobs sit in the active file before the system indicates they are completed? If in the active file does that mean Council records have not been updated? 3. On page 1 the Certifier's BPB Accreditation number is requested. Please note this has already changed over to BDC for some certifiers.
29.	Please ensure that the Planning Portal can take a HUGE amount of electronic documentation in one attachment. It is extremely annoying when we have to split the documents into 2 or 3 sections just because the attachment was too large. Our company does 80% large residential projects, therefore we have to submit huge amounts of plans, documents and the like. PLEASE ENSURE THE PORTAL CAN HANDLE LARGE DATA DROPS.
30.	- ability to start with address so you know early on whether a project is able to be uploaded onto the portal instead of halfway through.

31.	This is not a user friendly system
32.	They did to give the option to state N/A on jobs where documents etc are not required. Also seems we have to enter the same information multiple times.
33.	As per 8 above.
34.	Not been able to register corporate, The mandatory fields need some adjustment, Not been able to delete a certificate if you have enter it incorrectly. More training. 3 emails each time a certificate is lodged.
35.	None of the FAQ Documentation is for users/recipients, only for applicants of certificates, need a FAQ guideline etc for Certifiers on how to log in, how to use the portal, tips, help desk for certifiers