

Response to Green Paper

Section	Heading	Summary of Proposal	CoA Comment	Recommendation
1.1.1	<i>Strategically-Led</i>	In order to increase it's prominence, provide in the Planning and Development Act that strategic planning is a purpose of the Act, and also provide a definition of strategic planning.	Supported	Support
1.1.2	<i>Strategically-Led</i>	Provide in the LPS Regulations that the review of a local planning scheme must be informed by, and respond to, a review of the local planning strategy.	Supported. This is the approach taken by City of Armadale in its December 2016 Local Planning Strategy	Support
1.1.3	<i>Strategically-Led</i>	Provide in the LPS Regulations that a complex scheme amendment must be accompanied by a proposed amendment to the Local Planning Strategy (in the form of a report).	Refer to report.	Do not support as proposed.
1.2.1	<i>Strategically-Led</i>	An overarching State Planning Policy be developed which: <ul style="list-style-type: none"> i. Provides a definition of sustainability for the planning system which reflects a balancing of economic development, environmental considerations, and social needs; ii. Reinforces sustainability as an essential element required to be taken into account in the making of any strategy or policy; and iii. Indicates the particular steps related to how economic, social and environmental factors are balanced. 	Supported. This is a fundamental function of the planning system but has never been properly communicated/acknowledged in legislation and policy	Support
1.3.1	<i>Strategically-Led</i>	Provide that every local planning strategy include a local housing strategy, except for low growth and small regional local governments which only require basic local planning scheme requirements.	Supported. This is a fundamental element of LPS especially in an growth LGA such as the City of Armadale whose December 2016 LPS has a Housing Strategy as a major component	Support
1.3.2	<i>Strategically-Led</i>	The DPLH to provide guidance for local government in the Local Planning Manual on how to prepare a Local Housing Strategy, including a methodology for local housing analysis.	Supported. The methodology should not be overly prescriptive to prevent burdening LGA's with unnecessary costs and to allow tailoring to local needs	Conditional support
2.2.1	<i>Legible</i>	State Planning Policies be consolidated into a single state planning policy framework with supplementary technical guidance.	Supported	Support
2.3.1	<i>Legible</i>	WAPC to establish common strategic "elements" for the State Planning Framework including but not limited to: <ul style="list-style-type: none"> • a "sustainability" element; • a "land use element" that includes the distribution of uses of land as well as density; • a "housing element" that includes the types of housing; • an "environmental element"; • an "open space element"; • an "urban form and design element"; and • an infrastructure element. and prepare Technical Guidance for the details of each element e included;	Supported	Support
2.3.2	<i>Legible</i>	Provide that every State Planning Policy, regional or sub-regional plan and the local planning strategy must follow these elements, unless otherwise agreed to by the WAPC.	Supported. However some flexibility is required to deal with specific local issues/characteristics.	Conditional support
2.3.3	<i>Legible</i>	Provide that every local planning strategy must explain how it has addressed the requirements of each common strategic element against the requirements of State Strategy, Planning Policy or regional or sub---regional strategy.	Supported. However some flexibility is required to deal with specific local issues/characteristics.	Conditional support
2.3.4	<i>Legible</i>	Provide in the Planning and Development Act that all planning decision makers are to have due regard to State Planning Policies.	Supported	Support
2.3.5	<i>Legible</i>	Provide in the Metropolitan Redevelopment Authority Act 2011 that in performing functions under the Act, the MRA must have regard to State Planning Policies.	Supported. The Metropolitan Redevelopment Authority Act 2011 may be repealed after the LandCorp / MRA merger so this recommendation should be expanded to include any future Act they may come into being.	Conditional support
2.4.1	<i>Legible</i>	Require that a local planning scheme be published with the inclusion of the local planning strategy (in the form of a local strategic statement) and local planning policies in a document to be called a "Comprehensive Local Planning Scheme".	Refer to report.	Do not support as proposed.

2.4.2	Legible	DPLH to provide guidance for local government in the Local Planning Manual on the content and format of a local planning strategy and local planning policies.	Supported. A standardised structure would be beneficial but needs flexibility to cope with a wide range/variety of local issues covered by a Local Planning Strategy and Local Planning Policy.	Conditional support
2.4.3	Legible	Local governments currently undertaking, or about to embark on, a substantive review of their planning frameworks delay preparation of local planning strategies and local planning schemes (and related omnibus amendments) until guidance on the format and content of local planning frameworks is available.	This recommendation should be reviewed subject to guidance on timeframes for the implementation of the Local Planning Reform process. A moratorium on policy development would penalise proactive LGAs and a preferred alternative would be to require ongoing policy development to converge/be consistent with directions of the Green Paper.	Conditional support
2.4.4	Legible	Provide in the LPS Regulations for a clear distinction of the purposes of Local Structure Plans, Activity Centre Plans, Local Development Plans and Local Planning Policies.	Supported	Support
2.4.5	Legible	The DPLH to provide guidance in the Local Planning Manual on the appropriate use of each local planning instrument.	Supported	Support
2.5.1	Legible	The DPLH to update the Local Planning Manual with guidance on the preparation, the content and format of a Local Planning Strategy and strategic statement, in a similar form to a Victorian Municipal Strategic Statement.	Supported	Support
2.6.1	Legible	The LPS Regulations be amended to provide that local planning policies are to be prepared in a manner and form approved by the WAPC.	Supported, except the requirement for local planning policies to be referred to DPLH and determined by the Minister.	Support, except the requirement for local planning policies to be referred to DPLH and determined by the Minister.
2.6.2	Legible	The DPLH to update the Local Planning Manual to provide guidance for the form, content and writing of a local planning policy.	Supported, except the requirement for local planning policies to be referred to DPLH and determined by the Minister.	Support, except the requirement for local planning policies to be referred to DPLH and determined by the Minister.
2.7.1	Legible	Provide in the PD Act that deemed provisions are to be included in a comprehensive local planning scheme.	Supported. The City attempted to combine the Deemed Provisions from the Regs and the remaining sections of TPS 4 in one document via Amendment 86 for the reasons cited. The Ministerial decision prior to adoption instructed the City to specifically remove the deemed provisions from TPS 4 and have them remain separate documents (CoA Ref: CE/6798/17; WAPC Ref: TPS/1928).	Support
2.7.2	Legible	Provide in the LPS Regulations that a comprehensive local planning scheme is to include a specific section for deemed provisions.	Supported. This will make the inclusion of deemed provisions into the text simpler.	Support
2.7.3	Legible	Provide in the LPS Regulations that there are deemed provisions which set out standardised zones, land uses and land use permissibility which: i. group like-land uses into themes for which common development standards can be prepared; ii. identify low risk land use proposals by including suitable parameters for which a streamlined planning process apply; and iii. are mandatory for local government to adopt within their municipalities through the next scheme review or omnibus amendment.	Refer to report.	Do not support as proposed.
2.7.4	Legible	The DPLH to revise and keep up-to-date the Local Planning Manual to ensure it provides local government with the guidance required to prepare and administer its local planning framework and properly reflects the expectations of DPLH and WAPC.	Supported, except the requirement for local planning policies to be referred to DPLH and determined by the Minister.	Support, except the requirement for local planning policies to be referred to DPLH and determined by the Minister.
2.8.1	Legible	Provide in the LPS Regulations that there be a location within the model provisions for mandatory development requirements for key sites and matters.	Strongly support inclusion of the ability for TPS to include mandatory requirements.	Support
2.9.1	Legible	Develop an interactive 'Planning Portal' for keeping local planning schemes online and accessing them in a legible and user-friendly format.	Supported	Support

3.2.1	Transparent	The DPLH should develop a Community Engagement Charter for all aspects of the planning system that includes principles with regard to: i Planning authorities having a duty to engage with the community in a manner that allows residents to contribute to the making or amending of a strategic plan; and ii In the making or amending of a strategic plan, the community, as soon as possible, be given information as to what is proposed and any documents that the planning authority intends to examine.	Supported, however consideration needs to be given on the level of consultation required, so that it has minimal impact on Local Government budgets, which are already constrained. Also community consultation is not something that is lacking in the planning system especially at Local Government level; the issue is more to do with transparency of decision making and recently this has been tested by the introduction of Development Assessment Panels (DAPs) which have removed certain decision making from Local Government.	Conditional Support
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3.2.2	Transparent	Align engagement processes in the planning regulations to the Community Engagement Charter.	Supported	Support
3.2.3	Transparent	Revise public notification and engagement requirements for planning proposals in the PD Act and LPS Regulations to update out-dated requirements.	Supported	Support
3.2.4	Transparent	Make provision within the LPS Regulations that the local planning strategy must be in accordance with the Community Strategic Plan under the Local Government Act to the extent that it is relevant.	Supported	Support
3.2.5	Transparent	DPLH to revise the Local Planning Manual to clarify that:	Supported	Support
		1. actions in local planning strategies are limited to those matters that can be carried out within the local planning scheme;		
		2. acknowledge a concurrent community participation process between a Strategic Community Plan and a local planning strategy.		
3.3.1	Transparent	The DPLH to publish a Guide as to the Scope of Reasons by Planning Decision Makers, having regard to the Queensland model.	Supported	Support
3.3.2	Transparent	Provide in the LPS Regulations that reasons for decisions are to be provided on planning proposals.	Supported	Support
3.4.1	Transparent	WAPC practice be modified to publish Statutory Planning Committee and WAPC agenda items, reports and recommendations on region and local schemes and amendments.	Supported	Support
3.5.1	Transparent	Provide in regulations mandatory reporting by local government on planning matters.	Supported. The City is already participating in a voluntary reporting program run by WALGA.	Support
3.6.1	Transparent	Provide for DAP meetings to be held at regular times and outside of business hours.	Supported	Support
3.6.2	Transparent	Provide for the recording of each meeting of a DAP and made available on the DAP website of DPLH.	Supported	Support
3.6.3	Transparent	Provide clarification in DAP Practice Notes:	Supported	Support
		1. If new information is submitted to the DAP after an RAR, the DAP should consider whether a decision should be deferred pending further RAR advice; and		
		2. As to when it may be appropriate to defer a decision, such as where issues are raised which require further detailed technical consideration by responsible authorities.		
3.6.4	Transparent	Amend the DAP Practice Notes to require reasons for decisions to be given in all decisions made by a DAP, including where the DAP adopts the responsible authority's recommendation contained within the RAR.	Supported	Support
3.6.5	Transparent	Provide for a requirement that applications amended through a SAT process are readvertised unless the amended plans comply with all development standards.	Supported	Support
3.6.6	Transparent	Provide that where a DAP has been invited to reconsider its decision following a SAT mediation, new specialist members be drawn from the available pool of members.	Supported	Support
3.6.7	Transparent	The SAT should consider preparing a framework for allowing parties with a sufficient interest in a matter to make a submission or be heard during SAT mediation of DAP matters.	Supported	Support
3.6.8	Transparent	Provide for expert DAP members to be drawn from a pool of members across the State on the basis of the type and complexity of the application being heard.	Supported	Support
3.6.9	Transparent	Provide for an expanded and flexible meeting process where the DAP Presiding member is of a view in relation to an application for development that wider community and local government viewpoints need to be examined.	Supported	Support
3.6.10	Transparent	Provide in the DAP Regulations that the WAPC retains its decision making ability with respect to development applications under region schemes.	Supported	Support
3.6.11	Transparent	Provide for a presiding member to be appointed also as the Chief Presiding Member to:	Supported	Support

		1. Oversee the quality and consistency of DAP procedures and decisions (such as consistency of the use and content of conditions; the quality of RAR reports) and recommend changes to DAP procedures and Standing Orders to DPLH;		
		2. Assist in identifying panel members appropriate to sit in accordance with the basis of the type and complexity of the application being heard; and		
		3. Identify training needs for DAP members for the approval of the Director General DPLH.		

4.1.1	<i>Efficient</i>	Provide that the PD Act be amended to delete the WAPC function s14.(a)(ii) of advising the Minister for Planning on the administration, revision and reform of legislation.	Supported	Support
4.1.2	<i>Efficient</i>	Provide for a local government accreditation process.	Supported	Support
4.1.3	<i>Efficient</i>	Increase delegations from WAPC to DPLH and local government, for the purpose of the WAPC focussing on the State policy framework and regional strategic planning.	Refer to report.	Support
4.1.4	<i>Efficient</i>	Provide for the PD Act to be amended to:	Supported	Support
		1. Revise the WAPC membership to 5 to 7 members with various experience, skills or knowledge		
		2. Amend WAPC Committees		
4.1.5	<i>Efficient</i>	The role and purpose of a Coastal Planning Committee be reviewed, and consideration be given to the most appropriate host organisation and regulatory framework for the Committee.	Supported. Not applicable to the City.	Support
4.1.6	<i>Efficient</i>	Revise the Service Delivery Agreement between the WAPC and DPLH to accord with the revised roles of the WAPC and DPLH.	Supported	Support
4.1.7	<i>Efficient</i>	Provide for new positions to be created to enable DPLH to recruit senior and experienced town planners to undertake strategic planning and policy development for the WAPC.	Supported	Support
4.1.8	<i>Efficient</i>	The DPLH and WAPC establish a protocol for the engagement of non-public sector expertise in the scoping and development of policies.	Supported	Support
4.2.1	<i>Efficient</i>	A planning reform team be retained by the DPLH to implement proposals arising from the planning review and ongoing reforms to the Western Australian planning system.	Supported	Support
4.2.2	<i>Efficient</i>	A framework for referral of planning applications to be incorporated in regulations as appropriate.	Supported	Support
4.2.3	<i>Efficient</i>	As an interim arrangement, the DPLH Independent Planning Reviewer be available to assist on issues regarding referral for WAPC matters.	Supported	Support
4.2.4	<i>Efficient</i>	Provide in regulation that an applicant may seek pre-lodgement advice for development applications.	Supported. The City already offers pre-lodgement advice.	Support
4.2.5	<i>Efficient</i>	Development Assessment Guidance be published by the DPLH in consultation with local government and industry bodies.	Supported	Support
4.2.6	<i>Efficient</i>	Provide in the LPS Regulations that a local government must advise an applicant within 10 business days of receipt of a development application whether additional information is required.	Refer to report.	Do not support.
4.2.7	<i>Efficient</i>	Provide a procedure for local government and developer proponents to agree upfront the scope and content of a local structure plan with the DPLH and other agencies as appropriate.	Supported	Support
4.2.8	<i>Efficient</i>	Provide in the PD Act that the implementation section (part one) of approved structure plans and activity centre plans are to be read as part of the scheme and have the "force and effect" of the scheme.	Refer to report.	Support
4.2.9	<i>Efficient</i>	Provide in the LPS Regulations that local government may refuse to progress a local structure plan or activity centre plan and amendment, if it is of the view that the proposals lacks sufficient planning merit. The amendment should so include ability for a proponent affected by such a decision to seek the views of the WAPC and the power for the WAPC to direct a local government to progress a proposal.	Supported	Support

4.2.10	<i>Efficient</i>	Provide for development contribution plan cost and cost contributions schedules to be included as a schedule in local planning schemes.	Refer to report.	Do not support as proposed.
4.2.11	<i>Efficient</i>	Establish a Development Contributions Infrastructure Panel to review proposed local planning scheme amendments that include Development Contribution Plans, with the cost of the review to be included as a development contribution plan administration cost.	Supported. However the cost of such support being included in a DCP should not undermine the delivery of the essential community and / or infrastructure projects included in a DCP nor add to scheme amendment approval timeframes that would be contrary to the objectives of the WAPC's review. Any costs should also be agreed upfront and verifiable and be prefunded by the WAPC. The WAPC could only be reimbursed once funds become available in the DCP and it is appropriate to do so taking into consideration other DCP costs / priorities that may be outstanding at the time.	Conditionally support
4.2.12	<i>Efficient</i>	Provide for in the PD Act an ability for the Minister for Planning to: i require a special report from a local government on the operation of a development contribution plan; and ii instruct a local government to take particular actions for the administration of a development contribution plan.	DCPs should be reviewed annually so costs, land areas and land values can be reviewed and other responses to change considered. All reviews should be advertised to the DCP stakeholders, including the WAPC for comment. Additional call in or review processes beyond those already available to the WAPC are not seen as worthwhile and may be contrary to the objectives of the WAPC's review.	Do not support as proposed.
4.2.13 & 4.2.14	<i>Efficient</i>	Provide in the LPS Regulations for a voluntary 'deemed-to-comply' check for single houses and provide in the PD Regulations a specified fee for the service. Provide in the LPS Regulations and R-Codes a fast-track 30-day planning approval process for single house applications that require only minor variations to the R-Codes.	Refer to report.	Do not support as proposed.
4.2.15	<i>Efficient</i>	A framework for "Basic", "Standard" and "Complex" streams for region scheme amendments, local planning strategies and amendments, and local structure plan/activity centre plans and amendments be developed by the DPLH for implementation through regulation.	Supported	Support

5.1.1	<i>Delivering Smart Growth</i>	That the State Government develops clear arrangements for the planning and delivery of the key urban infill locations of activity centres, urban corridors and station precincts, including prioritising of areas which require State and local government collaboration.	Supported	Support
5.2.1	<i>Delivering Smart Growth</i>	A new Consolidated and Connected Smart Growth State Planning Policy that builds on the State Government's METRONET policy and establishes contemporary smart growth principles and practices.	Supported	Support
5.6.1	<i>Delivering Smart Growth</i>	The Metropolitan Region Scheme be updated to include "Urban Corridor" as a category of Reserved Roads based on Perth and Peel @ 3.5 Million, with the Department of Transport being made responsible for coordinating a whole of transport portfolio response to planning proposals along the corridor.	Refer to report.	Support
5.6.2	<i>Delivering Smart Growth</i>	A review be undertaken of regional road reservations in place to accommodate road widenings within the Metropolitan Region Scheme for	Supported	Support
5.71	<i>Delivering Smart Growth</i>	Liveable Neighbourhoods be elevated to a State Planning Policy and maintained and refined as a best---practice approach to new greenfields	Supported	Support
5.7.1	<i>Delivering Smart Growth</i>	Liveable Neighbourhoods be elevated to a State Planning Policy and maintained and refined as a best---practice approach to new greenfields development at regional, district and local level.	Supported	Support

<i>Suggestions</i>		No mention of a reasonable timeframe for review of planning fees set by Regulation – long standing issue. Annual financial year adjustment to CPI should be possible. Check when such fees were last reviewed.
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<i>Suggestions</i>		<p>A key impediment to the delivery of infill development is community resistance to change and this is often 'played out' through Local Governments being resistant to increasing residential densities through Town Planning Schemes. An example is many Local Council's in the Western Suburb locations, despite being close to high amenity and infrastructure (shops, parkland and passenger rail), community resistance has subdued change for further infill and this has therefore resulted in the under delivery of infill development in areas where densification of residential land often has the highest possible chance of success. Resolving this could be done through the normal scheme review process or 'call in powers' that the Minister for Planning currently has but is seldom used for political reasons. It is recommended that the WAPC/DPLH convene a special Scheme Review Committee which specifically targets Local Governments who traditionally underperform when it comes to achieving infill targets (either actual or through not allowing opportunity through schemes). This Committee could identify underperforming LG's, consider the potential of the scheme, and then recommend to the Minister for Planning when 'special powers' under the P & D Act could be called upon. Having this Committee provides support to the Minister for Planning by providing the Minister with expert opinion which can then be used to inform decision to use 'call in powers' for scheme review with some degree of 'arms-length' to it.</p>
<i>Suggestions</i>		<p>The argument for achieving consistency and using the example of Local Planning Schemes could have perhaps benefited from considering the differences in Town Planning Schemes within Metropolitan and Peel and Regional Western Australia. It is agreed that reform is required in the area of Town Planning Schemes but this should be a function of the quality of the review and approval process rather than the standards that currently exist to guide the preparation of Town Planning Schemes. The Model Scheme Text has been established for some time now and is supposed to guide the preparation of Town Planning Schemes by Local Government. Once prepared the Town Planning Scheme process ultimately requires</p>
<i>Suggestions</i>		<p>Reform to achieve greater focus on the 'Strategic Planning' element of the Planning system is supported, however what is proposed, largely focuses on 'Town Planning' in isolation. More broader focus on the interplay between Town Planning and other relevant Acts / processes is required to ensure that true reform in the 'Planning System' can be achieved. An obvious example is how Environmental Law relates to 'Town Planning' and how the interplay between the two could be reviewed / reformed to streamline process.</p>
<i>Suggestions</i>		<p>Whilst it is understood that the 'Town Planning' processes and practices of the Metropolitan Redevelopment Authority is currently under review (set up of joint LandCorp/MRA Board for example), consideration needs to be given to align some of the processes and practices so that it is similar to local government. An example is decision making transparency which through the Local Government system proponents and objectors have the opportunity to present agreeing or opposing views on a project prior to final decision making (usually at Committee and Council level). This is lacking through the current MRA model and has exposed it in the past to criticism in terms of transparency in decision making.</p>
<i>Suggestions</i>		<p>Outside of the Planning process, consideration needs to be given to the review of the Local Government Act to ensure that 'common' planning matters are dealt with the same way by Local Government through streamlining the 'delegations' permitted. For example the Local Government Act and its Regulations could change to ensure that all minor planning matters (to be defined) are delegated from Council to CEO and CEO to Administration. This would improve efficiency by giving ratepayers, developers and the like a common understanding between Council's on what can be dealt with under delegation.</p>
<i>Suggestions</i>		<p>Development Assessment Panel (DAP's) – Broader reform is required on the eligibility criteria of DAP's to increase the monetary level of 'optional' referrals to JDAP's (Part 2 section 6 of the Regulations). \$2m is a low opt-in benchmark and this should be raised to \$5m. Statistics show that LG decision making on DA's is in the high 90% for approval and in terms of determinations within the Regulated timeframes it is in the order of 80% which is high by any standard (WALGA statistics can be used to confirm exact numbers).</p>

<i>Suggestions</i>		LG fees for planning matters requires a more comprehensive review to ensure LG is adequately funded to manage the increasing regulator work required to manage the planning system in WA. An example is LG's involvement in DAP applications. LG currently only receive the standard fee for processing a development application (associated with the monetary amount for the construction cost) and this needs to be increased to take into consideration the level of work required to be done by the Responsible Authority in assessing the application, preparing Responsible Authority Reports' (RAR) and attending / presenting at DAP meetings (as an example).
<i>Suggestions</i>		The Planning System should consider removing from the Regulations and from the Town Planning System in general the option for the industry to prepare Local Development Plans. From both the Regulator and Applicants point of view, it adds another layer to the planning process which is already made complex by having SPP's, Town Planning Schemes, Structure Plans and Local Planning Policies to mention the key documents. With greater expansion of Structure Plans as suggested above, planning provisions normally captured in an LDP could be incorporated into a Local Planning Policy or Structure Plan and therefore could be removed altogether from the Planning System which will simplify the process.
<i>Suggestions</i>		Structure Plans - Delegate the determination of minor Structure Plan amendments to Local Government;
<i>Suggestions</i>		Town Planning Scheme Text – Review of 'Model' land uses to remove reference to Liquor Licensing Act 1988:
<i>Suggestions</i>		The LLA is referenced in Hotel, Liquor Store-Small, Liquor Store-Large, Motel, Night Club, Restaurant, Small-Ball, Tavern;
<i>Suggestions</i>		The land use definitions don't align with the RGL classifications which causes confusion and conflicting land use classifications;
<i>Suggestions</i>		Consider removing the need for a Section 40 Certificate in light of the State Government recent announcements to relax requirements. (Refer to this recent article: http://www.abc.net.au/news/2018-02-14/liquor-reforms-give-tourism-look-in-on-new-venues-wa/9446050?WT.ac=statenews_wa)
<i>Suggestions</i>		Scheme Amendments - Include the ability to delegate scheme amendment initiation to officers (noting that scheme amendments will still go to Council at the final approval stage);
<i>Suggestions</i>		Dual Determinations – Eliminate the scenarios which currently require dual determination for planning approval (i.e Swan River Trust Management Area) as there should be only one determining authority for an application;
<i>Suggestions</i>		of Finance (Building Management & Works) delegations as there is currently a lot of double handling with pre- referral of DA's followed by a formal referral: consider one referral process, or exempt approvals, particularly minor works such as patios, shade sails, toilets etc. https://www.planning.wa.gov.au/dop_pub_pdf/Pages_1394to1395_Gazette_24_April_20
<i>Suggestions</i>		Housing Authority Delegation – Referral of single dwellings and demolition applications to LG's– These are unnecessary and could be exempt from approval or the need to refer to LG's for comment. (NB: Dept. of Housing now under Dept. of Community Services) https://www.planning.wa.gov.au/dop_pub_pdf/Gazette_30_June_2017_Housing_Authority_Delegation.pdf (DEL 2017/03)
<i>Suggestions</i>		Bushfire - Repeal/amend the bushfire regulations to exempt all Single Houses from requiring Planning approval (regardless of lot size) as the BCA already invokes AS3959
<i>Suggestions</i>		Cash in Lieu of Public Open Space - Include environmental works such as weed removal and revegetation in the list of permitted Public Open Space cash-in-lieu works;
<i>Suggestions</i>		Cash in Lieu of Public Open Space - Delegate approval of Public Open Space cash-in-lieu expenditure from the Minister/WAPC to Local Government, as per standard WAPC
<i>Suggestions</i>		Public Works - simplify the Public Works process by exempting all agencies from planning approval where the proposed works comply with the respective legislation;
<i>Suggestions</i>		Direction Notices – include the ability to issue a direction notice for differing time frames – 30 days for minor and 60 days for more significant breaches;