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Reform, Design and State Assessment  
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## REVIEW OF THE LOCAL DEVELOPMENT PLAN FRAMEWORK – PRELIMINARY ENGAGEMENT

Thank you for giving UDIA WA the opportunity to participate in the early engagement for this planning reform project to review the Local Development Plan (LDP) Framework.

We understand the aim is to provide improved and contemporary guidance over how LDPs are prepared, assessed, and used in decision making, and that it will include revisions to the manner and forms for different types, as well as proposed regulatory changes.

Without having seen the proposals, we would like to reiterate some general comments at this stage, which we feel are important considerations as this planning reform project progresses:

- Reducing the number / use of LDPs should not be the primary driver of this reform project (although it is appreciated this will likely naturally occur over time with the MD Codes).
- LDPs are an important and valid instrument for orderly and proper planning, particularly in a precinct context and bearing in mind that not everything is residential. There will also still be situations where with justification it is appropriate to use LDPs in a residential context and this should continue to be supported. This was acknowledged by WAPC and DPLH representatives when the MD Codes were in development and industry was assured at that time LDPs would continue to be a valid mechanism where full compliance with the Codes was not achievable.
- LDPs offer many benefits, not least:
  - For coordination of outcomes, particularly for the public realm interface.
  - Providing a streamlined process of achieving R-Code variations for building license where appropriate (although it is accepted that they should not be used as standard to circumvent the MD Codes without sound reason).
  - Acting as a communication tool for landowners / builders by providing a single reference point for relevant documents/planning framework applicable to the extent of LDP.
  - Providing built form controls for precincts where R-Codes do not apply – effectively built form codes.
- We understand DPLH may have some concerns regarding the perceived diminishment of amenity associated with LDPs, however we feel this could and should be addressed through ensuring appropriate assessment. The Codes still provide a performance assessment stream and if a LDP (or DA) is looking to vary any provision, the responsibility is firmly with the proponent to adequately justify this.



- Regarding the Regulations and Framework, and any potential changes thereof, it would be our expectation that these continue to recognise LDPs as a valid instrument and do not seek to limit them unnecessarily.

We can provide a range of examples to illustrate where and why an LDP was the appropriate instrument. Two such examples include [Akin, Currambine](#) and Mosaic, Balcatta ([Centro Precinct](#) and [Arise Precinct](#)).

We look forward to further engagement as the process continues, including consultation on the details of any draft regulatory changes and on the resultant guidance.

We will be discussing this matter at **our next Land Use Planning Standing Advisory Group meeting, currently scheduled for 9am on 8 June 2023**. We would like to invite representatives from this reform project team to attend the meeting to talk through this with the group.

Our Executive Director – Strategy and Policy, Sarah Macaulay, will be in touch to discuss further engagement. You can also reach her at [smacaulay@udiawa.com.au](mailto:smacaulay@udiawa.com.au) or 9215 3404.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tanya Steinbeck', is positioned above the printed name.

Tanya Steinbeck  
**Chief Executive Officer**