

Flying Minute: State Planning Policy 2.9: Planning for Water - Submission

By Ashley Robb, Senior Policy Advisor, Planning

That the Draft State Planning Policy 2.9: Planning for Water submission be endorsed.

RESOLUTION 212.FM/2021

CARRIED

Executive Summary

- In August 2021, the Department of Planning, Lands and Heritage released *Draft State Planning Policy 2.9: Planning for Water* and policy guidelines for public consultation.
- The draft policy is an amalgamation of six different state planning policies related to water, and the Government Sewerage Policy.
- WALGA has been involved in the policy's formulation since commencement of the process in 2018 through participation on the stakeholder reference group.
- Many of the recommendations proposed by WALGA have been integrated into the draft policy and guidelines throughout the policy formulation process. Consequently, the submission includes mostly minor amendments to strengthen existing provisions as well as a number of recommendations to support policy implementation.

Attachment

- State Planning Policy 2.9: Planning for Water submission

Background

In August 2021, the Department of Planning, Lands and Heritage (DPLH) released [Draft State Planning Policy 2.9: Planning for Water](#) and policy guidelines for public consultation.

The intent of the new policy is “*to ensure that planning and development considers water resource management and includes appropriate water management measures to achieve optimal water resource outcomes*”. The policy's objectives are broad and encompass environmental, social, cultural and economic water related values; protection of drinking water sources; riverine flooding; water supply and reuse; resiliency to climate change; and wastewater management.

The draft policy is an amalgamation the Government Sewerage Policy (2019) and six different state planning policies related to water: SPP 2.1 - Peel-Harvey coastal plain catchment (1992); SPP 2.2 - Gngangara Groundwater Protection (2005); SPP 2.3 - Jandakot Groundwater Protection (2017); SPP 2.7 - Public drinking water source (2003); SPP 2.9 - Water resources (2006); and SPP 2.10 - Swan-Canning river system (2006).

Preparation of the new policy commenced in 2018. As part of the process, the DPLH established a stakeholder reference group that included representatives from the Department of Water and Environmental Regulation; the Department of Biodiversity, Conservation and Attractions; Main Roads Western Australia; Water Corporation; the Peel Harvey Catchment Council; and the Urban Development Institute of Australia (WA). WALGA was represented on this group by its Planning and Building Team and Environment Team.

Local Governments play a key role in water planning and management in Western Australia through their strategic and statutory planning functions, and role as infrastructure asset manager and in some cases, service provider.



WALGA's advocacy in relation to the preparation of SPP 2.9 and this submission has included:

- Representation on the stakeholder reference group since 2018;
- Holding a Local Government workshop in 2019 with approximately 30 participants including Local Government planners and engineers, representatives from the DPLH, the Western Australian Planning Commission (WAPC) and private consultant Urbaqua, to seek Local Government input early in the policy formulation process;
- Targeted consultation with Local Governments most likely to be affected by the policy, particularly those in Perth's growth areas in 2020; and
- The release of WALGA's draft submission for sector feedback and a webinar in October 2021 attended by approximately 70 Local Government planners, engineers and other officers with water related responsibilities, and representatives from the DPLH, to discuss the policy and draft submission.

The draft submission was considered by the People and Place Policy Team at its meeting on 25 October 2021.

Comment

Many of the recommendations proposed by WALGA during the policy review process have been included in the draft policy and guidelines, demonstrating the productive working relationship between WALGA and the DPLH and the comprehensive stakeholder consultation approach adopted by the DPLH to inform the policy's preparation.

Key areas of WALGA advocacy and support that have been addressed in the draft policy include:

- Clarity on the role of planning instruments that can be used to apply the policy, such as special control areas and local planning policies;
- The importance of preserving ecological linkages to mitigate the impact of ecological system fragmentation;
- Local Government discretion to exempt dams from the requirement to seek planning approval;
- Strengthening the need for proposals to manage nutrient exports within acceptable levels, particularly for intensive agricultural land uses and in accordance with State Government requirements;
- A four-stage process for assessing the cumulative impact of large development proposals;
- A clear presumption against the intensification of development within defined floodways;
- Requirement for site and soil evaluators to be accredited and registered; and
- Key implementation recommendations such as fact sheets, consistent planning scheme and policy provisions, and support for Local Governments to identify approaches that ensure appropriate development can continue on subdivided, unsewered lands within the bounds of the policy and guideline requirements.

WALGA's submission therefore contains mostly minor amendments to strengthen existing provisions within the policy and guidelines to ensure:

- public open spaces have adequate fit-for-purpose water resources so new communities have access to irrigated public open spaces; and
- proponents seek the support of the relevant Local Government when that Local Government is not the relevant planning authority, where it is intended that Local Government will be the infrastructure asset manager or where the proposed location of water infrastructure assets impact Local Government assets or facilities.



The submission also makes recommendations to support policy implementation. The DPLH has advised that budget has been allocated to support on-ground policy implementation following the policy's formal adoption.

The People and Place Policy Team endorsed the submission on 25 October 2021.



FLYING MINUTE OUTCOME

Poll created: 26/10/2021 at 16:04

Poll closed: 08/11/2021 at 09:00

Total invited to survey: 21

Total finished survey: 12

Endorse the Recommendation: 12

Endorse the Recommendation subject to comment below: 0

Do not endorse: 0

First Name	Last Name	Completed Date
Carol	Adams OAM	04/11/2021 13:08
Phillip	Blight	01/11/2021 12:27
Ruth	Butterfield	Not completed
Karen	Chappel	03/11/2021 7:40
Cheryl	Cowell	Not completed
Malcolm	Cullen	29/10/2021 11:41
Frank	Cvitan	08/11/2021 9:07
Tony	Dean	08/11/2021 9:18
Catherine	Ehrhardt	Not completed
Russ	Fishwick	28/10/2021 8:24
Logan	Howlett JP	02/11/2021 15:10
Mark	Irwin	Not completed
Paul	Kelly	31/10/2021 21:30
Peter	Long	Not completed
Cate	McCullough	Not completed
Chris	Mitchell JP	Not completed
Les	Price	05/11/2021 22:44
Michelle	Rich	Not completed
Ken	Seymour	Not completed
Stephen	Strange	04/11/2021 15:53
Doug	Thompson	27/10/2021 14:08



Responses

(12) Endorse the Recommendation: Doug Thompson (on: 27/10/2021 14:08), Russ Fishwick (on: 28/10/2021 8:24), Malcolm Cullen (on: 29/10/2021 11:41), Phillip Blight (on: 01/11/2021 12:27), Paul Kelly (on: 31/10/2021 21:30), Logan Howlett JP (on: 02/11/2021 15:10), Karen Chappel (on: 03/11/2021 7:40), Carol Adams OAM (on: 04/11/2021 13:08), Stephen Strange (on: 04/11/2021 15:53), Les Price (on: 05/11/2021 22:44), Frank Cvitan (on: 08/11/2021 9:07), Tony Dean (on: 08/11/2021 9:18)

(0) Endorse the Recommendation subject to comment below

(0) Do not endorse

Comments

Nil

Secretariat Comment

Nil

State Planning Policy 2.9: Planning for Water

Submission

October 2021

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Submissions due to the Department of Planning, Lands and Heritage by Monday 15
November 2021 to waterpolicies@dplh.wa.gov.au

Contents

1.0	About WALGA.....	3
2.0	Local Government and Water.....	3
3.0	Submission Preparation	3
4.0	Submission.....	4
4.1	Policy Positions.....	4
4.2	Draft Policy	6
4.3	Draft Guidelines	9
4.4	Policy Implementation.....	16

1.0 About WALGA

The Western Australian Local Government Association (WALGA) is the peak industry body for Local Government in Western Australia. WALGA is an independent, membership-based organisation representing and supporting the work and interests of 139 Local Governments in Western Australia.

WALGA provides an essential voice for approximately 1,222 Elected Members and approximately 22,000 Local Government employees as well as over 2.5 million constituents of Local Governments in Western Australia. WALGA also provides professional advice and services that provide financial benefits to the Local Governments and the communities they serve.

WALGA's governance structure is comprised of:

- WALGA State Council - the decision-making representative body of all Member Councils, responsible for sector-wide policy making and strategic planning on behalf of Local Government, and
- Five metropolitan and 12 country zones - groups of geographically aligned Member Councils responsible for the election of WALGA State Councillors that provide input into policy formulation and advice on various matters.

2.0 Local Government and Water

WALGA welcomes the opportunity to comment on the *Draft State Planning Policy 2.9: Planning for Water*. Water is a fundamental component to the health and wellbeing of local communities, their environments and economies, and many Local Governments have water resource related objectives within their strategic community plans and local planning strategies. Local Government is also a key decision maker, regulator, manager and provider of water management resources.

The community has a high expectation that water resources will continue to be protected through the planning framework and that Local Government has strong involvement in achieving that protection. Therefore, ensuring that future planning and development considers water resource management and includes appropriate water management measures to achieve optimal water resource outcomes is a critical issue for Local Governments and their communities.

WALGA would like to acknowledge the ongoing engagement between the Department of Planning, Lands and Heritage (DPLH) and Local Governments throughout the policy review process. The opportunity for Local Governments to be engaged at various stages has been a positive and constructive approach and we welcome opportunities to continue this approach on all state planning policy reforms.

3.0 Submission Preparation

This submission was prepared by taking the following key steps:

- WALGA representation on the policy review's stakeholder reference group (SRG) since commencement of the policy review in 2018.

- A workshop with approximately 30 representatives from Local Governments, as well as representatives from the Department for Planning, Lands and Heritage (DPLH), the Western Australian Planning Commission (WAPC) and private consultant Urbaqua, to seek early input into the policy review, in 2019.
- Targeted consultation by WALGA with Local Governments most likely to be affected by the policy, particularly those in Perth's growth areas, on various elements of the 2020 early draft policy, prior to providing feedback to the DPLH, in 2020.
- A webinar with approximately 70 Local Government planners, engineers and other officers with water planning and management related responsibilities, as well as representatives from the DPLH, to discuss the final draft policy and WALGA's submission, in October 2021.
- Endorsement by WALGA's People and Culture Policy Team in October 2021.
- Endorsement by WALGA's State Council in November 2021.

4.0 Submission

The comments in this submission are provided in three parts: (1) comments on the draft policy, (2) comments on the policy guidelines and (3) recommendations to support policy implementation.

WALGA has focused its comments in this submission on key areas for improvement or key areas of support, as they appear in each document. WALGA has used the below categories to clarify its position on these key areas:

- Supported – WALGA supports this section or requirement.
- Conditionally Supported – WALGA supports this section on the condition that amendments are made, or incidental legislation or regulation is amended.
- Not Supported – WALGA does not support this section and proposes substantial amendment or removal of this section.
- Further Information Required – There is insufficient information in the documents to make a decision to support or otherwise.
- To Be Added – This information is not currently included and should be for reasons provided.

Where WALGA has not provided comment, it can be assumed that WALGA is generally supportive of the content or requirements.

4.1 Policy Positions

WALGA has adopted the following policy positions in relation to water and these positions have informed the preparation of this submission.

A. Water Management Reports (Resolution 212.FM/2021)

As part of the Water Management Report endorsement process, formal support from the relevant Local Government should be required where:

- 1. It is intended that the Local Government will become the infrastructure asset manager, or*
- 2. The proposed location of water infrastructure assets will impact Local Government assets or facilities*

B. Public Open Space (Resolution 141.6/2010)

Local Government:

- *asserts that water for public open space should be secured in all water allocation plans, and that future community growth must be considered in allocation plans*
- *asserts that water for public open space should be excluded from any water trading regime*
- *acknowledges irrigation of public open space should be water efficient and Local Governments should continue to invest in water efficiency technologies*
- *asserts that water availability for public open spaces should be given a greater priority when planning for new development*
- *asserts that water availability for public open spaces should be given a greater priority when planning for new development*
- *asserts that State Government, in collaboration with all stakeholders, undertake an extensive review of public open space in Western Australia and commit to further investment in this area.*

Recommendations provided within this submission align with these policy positions.

4.2 Draft Policy

Section	Level of support	Comment
3 - Water in Western Australia	To Be Added	<p>The important role that groundwater and surface water play in rural and rural residential areas is not currently recognised in the policy and should be recognised in this section.</p> <p>Add additional text or similar "In many rural and rural residential areas, potable water is not supplied and these areas must draw their own water source. Thus, groundwater and surface water quality becomes central to many people being able to sustain life, social and economic existence."</p>
6.1 - Objectives - Public Open Space	To Be Added	<p>The policy objectives (5.1) and outcomes (6.1) recognise the importance of preserving social and cultural values associated with the State's water resources; however, the policy and policy guidelines do not adequately recognise the critical role that water plays in irrigating and maintaining functional public open spaces, in particular, spaces for active recreation and sport. Healthy and vibrant communities need functional recreational spaces and sporting facilities. As population and development densities increase, and residential block sizes decrease, WA communities will be ever more reliant on functional public open spaces. New development must be required to secure adequate water supplies for servicing these spaces.</p> <p>Add additional text or similar: "Planning and development identifies sufficient fit-for-purpose water resources as a requirement of urban land capability and rezoning to ensure communities have access to functional public open spaces."</p>
6.2 - Ecological Corridors	Supported	<p>The policy and policy guidelines recognise the importance of preserving ecological linkages for mitigating the impact of ecological system fragmentation caused by development, preserving and improving water resources and managing the impacts of climate change. The policy also defines ecological linkages and requires the mapping of ecological linkages during preparation of regional and district WMRs. The preservation of ecological linkages will be critical as development of land and population densities intensify.</p>

Section	Level of support	Comment
7.2 - Water Quality	Supported	<p>This section recognises that local planning policies can be used by Local Governments to provide more specific guidance to proponents and decision makers about local conditions and constraints affecting water quality preservation. The policy guidelines also make reference to the Peel Harvey Catchment Council's local planning policy template, adopted by several Local Governments in the Peel Harvey Catchment, as a good example of a local planning policy designed to provide specific guidance to proponents and decision makers about conditions and constraints affecting water in the local area that must be taken into account to ensure appropriate on-ground outcomes.</p>
7.4 - Dams, crossings and rural drains	Supported	<p>The policy guidelines state that dams are considered to be a form of development and require development approval under the <i>Planning and Development Act 2005 (WA)</i>; however; the policy acknowledges that Local Governments have discretion to exempt dams from this requirement by including such an exemption in a local planning scheme or local planning policy. More information is provided at section 8.3 of the guidelines.</p> <p>Allowing Local Governments to exempt dams from the requirement to seek development approval, in certain situations, is important because it allows Local Governments to formulate local frameworks that suit local conditions and contexts, particularly where dams are unlikely to substantially affect waterflow or sensitive water resources.</p> <p>WALGA notes that dams may still require permit approval through the Department of Water and Environmental Regulation (DWER) in the circumstances provided under 6.1.6 of the policy guidelines.</p>
7.4 – Wastewater	To Be Added	<p>Wastewater is an important resource that can be reused in various ways but is inadequately recognised throughout the policy and guidelines.</p> <p>Edit existing text: Change the word "disposal" to "management" in relevant sections of the policy and guidelines or make amendments which recognise that wastewater is becoming an increasingly important resource that can and, where appropriate, should be utilised on- and off- site.</p>

Section	Level of support	Comment
7.6 - Peel Harvey - Nutrient export	Supported	The policy and guidelines strengthen the capacity for Local Governments in the Peel Harvey catchment to set nutrient export management provisions in their local planning schemes and policies, and clearly indicates that intensive agricultural land uses (e.g. animal husbandry, annual horticulture, high stocking rates) are unlikely to be supported in soils with low capability to retain nutrients. The guidelines also refer to water quality objectives, stocking rates and land capability mapping requirements outlined in supporting documents.
General - Native Vegetation	Supported	The policy and policy guidelines emphasise the protection and use of native vegetation on multiple occasions. It is important that native vegetation is protected and used for rehabilitation and revegetation purposes due to the benefits provided to local ecosystems and resilience against climate change.



4.3 Draft Guidelines

Section	Level of support	Comment
1 - Introduction	Not Supported	Section 1.3.1 refers to WALGA's LGmap. This service has been discontinued and should be removed from the guidelines.
4 - Addressing Cumulative Impact	Supported	<p>The guidelines clearly outline the reasons for giving consideration to potential cumulative impacts early in the planning process, for instance during the preparation of strategies and schemes. This section supports policy measure 7.1 (e): <i>"Planning decisions (except development applications) should consider cumulative impacts on water resources. Where the cumulative impact is considered significantly detrimental, the proposal should not be supported."</i></p> <p>Cumulative impact assessments are a critical requirement because it is often a number of smaller proposals and associated impacts that in aggregation have negative effects on our water resources but individually may be difficult to detect and therefore assess.</p> <p>The guidelines set out a four-stage process for considering cumulative impacts and confirms that "(c)umulative impacts should not be considered a reason for refusal at the development approval stage".</p>
5 – Water Management Reports – Responsibility for Approval	Conditionally Supported	<p>Table 1 and other sections of the guidelines state that in order to seek approval of a <i>local</i> water management report (WMR), the proponent must seek the support of the Local Government where the Local Government is not the relevant planning authority: <i>"Where the local government is not the decision maker they must support the Local WMR prior to finalisation of the more important characteristic"</i> (p.10). This requirement is supported.</p> <p>However, Table 1 and other sections of the guidelines do not require the proponent to seek Local Government support of <i>district</i> WMRs. Rather, the approval authorities (WAPC and DWER) must consider these documents "in close consultation with relevant LG/s" (p.10).</p>

Section	Level of support	Comment
		<p>Proponents are required to submit district water managements reports with region scheme amendments, district structure plans and local planning scheme amendments. In many instances these instruments will propose that Local Governments become the responsible asset manager and be expected to assume the associated asset management risk. Therefore, it is imperative that proponents seek and demonstrate the support of the relevant Local Government/s for the district WMRs as part of the approval process, where it is intended that Local Government will be the infrastructure asset manager or where the proposed location of water infrastructure assets impact Local Government assets or facilities.</p> <p>Local Governments in Metropolitan areas, where region scheme amendments and district structure plans are mostly used or occur, have substantial skills in planning, health, asset management, engineering, and environment, as well as local knowledge. Requiring that district WMRs be supported by these Local Governments ensures that this substantial knowledge and skill set informs the district WMR process, helping to improve on-ground outcomes for future residents, while ensuring Local Governments and their communities are not burdened by inadequate water management assets.</p> <p>Early Local Government endorsement of district WMR level will also minimise the need for proponents to prepare lower-level WMRs, for example, local, subdivision and development WMRs.</p> <p>WALGA request the inclusion of a new footnote, similar to footnote 4 on page 10, for all three planning instruments requiring district WMRs, i.e. region scheme amendments and district structure plans, stating: “Where the local government is not the decision maker they must support the District WMR prior to finalisation of the more important characteristic.”</p> <p>Make incidental changes to Appendix C – District Water Management Report (p.68) to support the above change.</p>

Section	Level of support	Comment
5 – Water Management Reports	To Be Added	<p>Figure 1 and Table 1 imply that WMRs need to be prepared to accompany all local planning scheme amendments. However, WMRs should not be mandatory for local planning scheme amendments that do not affect water resources and management of these resources, particularly basic scheme amendments.</p> <p>Issues associated with mandatory local WMRs for all local planning scheme amendments:</p> <ul style="list-style-type: none"> • Unnecessary red-tape and a significant cost burden for most types of local government driven scheme amendment proposals. • While reporting is essential for some proposals, e.g. large scale urban and industrial developments, most local planning scheme amendments promulgated by a local government are for an administrative purpose or minor land use change where water considerations are limited and often not a concern. <p>Make modifications to clarify that WMRs are not required for local planning scheme amendments where determined unnecessary by the Local Government.</p>
Appendix C - Public Open Space – Water demand assessment	Conditionally supported	<p>District WMRs are identified in the guidelines as being the appropriate mechanism for helping relevant authorities identify if land is capable of rezoning for urban development. This district WMR requirement is supported: “If non-drinking water is unavailable from groundwater or surface water resources, the WMR must identify technically viable and financially sustainable alternative non-drinking water source options (refer to section 8.2)” (p.69).</p> <p>However, the guidelines need to specify that a district WMR must identify water resources that ensure the adequate provision of irrigated public open space (POS), and if not, land will be deemed incapable of rezoning to the urban zone.</p> <p>Additionally, the guidelines need to specify a minimum proportion of POS that must be irrigated in urban zoned land. Without such requirements, POS may be of little value or use to future residents during warmer and drier months of the year.</p>

Section	Level of support	Comment
		<p>The State Government's "Public Parkland Planning and Design Guide WA" (Government of Western Australia, 2014) emphasise the importance of irrigated public open spaces.</p> <p>Add additional text:</p> <ul style="list-style-type: none"> • Include a sub-section in the guidelines that highlights the role of urban waterbodies or supplies for providing irrigated public open spaces. In particular, emphasise that the ability to provide irrigated water to service functional public open spaces is a key consideration in assessing if land is capable of urban zoning. • In Appendix C, specify that a district WMR "must" (as opposed to "should", p. 70) identify water resources that ensure the adequate provision of irrigated public open spaces. • Consider including a minimum irrigated POS standard in consultation with Local Governments.
7.2 Identifying flood information in local planning instruments	Supported	The provision of suggested wording for a flood prone land special control area and additional provisions is important for improving consistency in how these special control areas are introduced into local planning schemes and applied.
7.3 Planning and development in flood prone land	Supported	<p>The guidelines state that: "There is a presumption against the intensification of development within a defined floodway through rezoning, subdivision or development."</p> <p>This is an important inclusion and is consistent with the approach taken in recent state government published documents regarding subdivision in flood prone areas, e.g. see Policy Statement 5.2 in the <i>Greater Bunbury Region Scheme Floodplain Management Policy</i> (2017, p.4).</p>

Section	Level of support	Comment
8.7.5 Onsite wastewater disposal	No comment	<p>The policy and guidelines refer to AS/NZS1547 - On-site domestic wastewater management.</p> <p>Earlier this year WALGA prepared a submission on “Managing Public Health Risks from Wastewater Conveyance, Treatment and Disposal in Western Australia”; a discussion paper prepared by the Department of Health. The submission notes that AS/NZS1547 requirements for domestic wastewater management systems do not align with the existing <i>Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974</i>.</p> <p>Local Governments also raised concerns during that submission process that applying AS/NZS1547 may produce the following impacts:</p> <ul style="list-style-type: none"> • complicate the legislative system that already operates effectively, • increase the size of footprints for onsite sewerage systems, • increase the complexity of onsite sewerage systems, • increase the complexity of the application process, • increase the complexity and frequency of maintenance, • increase the use of power and chemicals, and • increase the costs at every stage including installation and ongoing maintenance. <p>It is WALGA’s understanding that the Department of Health will amend these health regulations to adopt AS/NZS1547 because the standard “represents best practice for on-site sewage” (Government Sewerage Policy 2019, frequently asked questions, p.1) and will bring Western Australian requirements into alignment with other Australian States.</p>
8.7.6 Site and Soil Evaluations (SSE)	Conditionally Supported	<p>This section states that a “SSE should be signed off by a suitable qualified professional (such as a soil scientist) and to the satisfaction of the local government and the Department of Health (DoH)” (p.44).</p> <p>Earlier this year, WALGA prepared a submission on “Managing Public Health Risks from Wastewater Conveyance, Treatment and Disposal in Western Australia”; a discussion paper prepared by the Department</p>

Section	Level of support	Comment
		<p>of Health. The submission raises key areas of concern related to site and soil evaluations and the accreditation, or lack thereof, of soil scientists.</p> <p>For instance, Western Australia does not have an accreditation process for site and soil evaluators. In order to prepare or sign off SSEs, and minimise the review role of the Department of Health and Local Governments, site and soil evaluators should, at a minimum, be:</p> <ul style="list-style-type: none"> • familiar with any regulatory requirements; and • able to certify that the evaluation procedure has been undertaken in accordance with relevant standards. <p>Consequently, Local Governments have indicated a preference for site and soil evaluators to be accredited and registered.</p>
9.3 Region and local planning schemes	Supported	The provision of suggested wording for a PDWSA special control area and additional provisions is important for improving consistency in how these special control areas are introduced into local planning schemes and applied.
10.2 Local Planning Schemes	Supported	Suggested information for including in local planning schemes supports the consistent application of these scheme requirements across jurisdictions, providing clear guidance to Local Governments, landholders and the community.
Appendix E – Subdivision and Development WMR	Supported	<p>This section requires a proponent to submit a WMR when submitting a subdivision or development application, where a WMR has not already been lodged and approved for the site through an earlier planning process or does not provide sufficient information to assess the subdivision or development application. Providing this information at the subdivision or development application stage, where required, is necessary for efficient decision making.</p> <p>This section also allows the statutory decision-making timeframe to be paused where a Local Government seeks additional information or advice from a relevant agency as to the adequacy of information provided in a WMR. This capacity to pause the timeframe is critical because the Local Government should not be</p>



WALGA

Section	Level of support	Comment
		penalised, by way of not being able to meet statutory timeframes, in the event that proponents have not submitted sufficient and adequate information with an application.



4.4 Policy Implementation

The DPLH has indicated that resources are available to support the implementation of the policy and guidelines following adoption. WALGA provides the following recommendations to support policy implementation.

Section	Comment
Fact Sheet & Officer Workshops	<p>Local Governments have indicated that a fact sheet to simply explain the policy's requirements for proponents of small-scale subdivision and development will be necessary to avoid confusion and support continued development and subdivision. A consistent set of information that all Local Governments can use would be helpful.</p> <p>Local Governments and WALGA should be engaged to help prepare this information with the DPLH and DWER following policy implementation.</p> <p>Workshops for Local Government staff would also support effective and consistent policy implementation across Local Governments.</p>
Consistent Local Planning Scheme and Policy Provisions	<p>WALGA requests that the DPLH engage with Local Governments to help prepare a fact sheet or position statement (or similar) to provide clear guidance on how the policy and guideline requirements might be written into schemes and policies. This information may evolve over time as the policy is implemented.</p>
Sterilisation of land in unsewered areas	<p>Some Local Governments have raised concerns that the policy requirements may sterilise subdivided, undeveloped land that is unsewered. WALGA requests that the DPLH work closely with these Local Governments to identify approaches for ensuring that appropriate development can continue on these lands within the bounds of the policy and guideline requirements.</p>

END