

# Development Assessment Panels 2011 - 2024 Review

January 2025

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# 1.0 Introduction

This report is part of a series by the Western Australian Local Government Association (WALGA) that examines the performance of the Development Assessment Panel (DAP) system. Data from all decisions made by a DAP have been collected since establishment of the system in July 2011 until the end of the 2023-24 financial year.

WALGA does not support the continuation of the DAP system in its current form and considers there are reforms to the system are needed to ensure it operates in an efficient, effective, and transparent way, and where matters of local planning context are adequately considered by decision makers.

This report has been developed to inform a review of WALGA's DAP advocacy position in light of the finalisation of the State Government's DAP reforms. The findings of this report will be supported by extensive consultation and engagement with Local Governments to gain a full understanding of how the DAP system is currently performing. A reviewed DAP advocacy position, will sit within the context of WALGA's Planning Principles and Reform advocacy position that supports an efficient and effective planning system guided by legislation, policy, and processes that, *inter alia*,

- facilitates the creation of sustainable and liveable communities and places
- is easy to understand, accessible and transparent
- recognises the diversity of Western Australia and ensures that local environment, context, communities and character are appropriately reflected in planning frameworks and decision making
- ensures decisions are made by the level of government closest to and most impacted by a planning proposal.

Over its 13 years existence, the DAP system has undergone significant reform and modifications. The latest major reform to the DAP system came into effect on 1 March 2024, which included making DAPs an entirely opt-in development pathway, reducing the number of panels from five to three and the employment of full-time specialist DAP members. Given this report only captures four months of data since these reforms were introduced, it is unclear at this stage if these amendments will improve DAP operations.

In November 2024, changes to the *Local Government Act 1995* were also announced that would require all Responsible Authority Reports (RAR) to be submitted by the Chief Executive Officer of the Local Government instead of Council, and clarified that Council was to have no role in DAP functions performed by a Local Government. This change has not come into effect to date and requires the establishment of regulations.

In 2020 the State Government also established a temporary significant development pathway coordinated by the State Development Assessment Unit (SDAU), to encourage major developments as part of its COVID-19 economic recovery program. This was an opt-in pathway for development applications (DAs) that met a minimum monetary threshold of \$20 million in the metropolitan area and \$5 million in regional areas. These applications are assessed by the Department of Planning, Lands and Heritage (DPLH) and determined by the Western Australian Planning Commission (WAPC). A permanent version of this significant development pathway became operational on 1 March 2024, retaining the WAPC as the decision maker.

From its inception in 2020 until the end of the 2023-24 financial year, a total of 38 DAs were determined via the significant development pathway. WALGA will undertake a separate data collection and analysis on the significant development pathway to understand its effectiveness.

## 1.1 Data Collection Method

The data in this report was collated manually from information contained in the meeting minutes and agendas of the 2,595 DAP meetings held between July 1 2011 and June 30 2024. The meeting minutes and agendas are available on the DPLH's website. Data has been collected consistently, although the reporting methods by the DAP secretariat and responsible authorities have varied over the years. WALGA has adapted its data collection methods to suit these changing reporting techniques.

Data collected for this report and the subsequent analysis relates to individual determinations of DAPs. Decisions are categorised into the following categories:

- DA (development application)
- Form 2 (amendment to a previously approved proposal)
- SAT (reconsideration of a proposal following an appeal to the State Administrative Tribunal)
- DA D (development application deferred by a DAP)
- Form 2 D (Form 2 application deferred by a DAP)
- SAT D (reconsideration of a proposal following an appeal to the State Administrative Tribunal deferred by a DAP).

This categorisation of applications allows for the accurate reporting of the number of items the DAP system has considered over its 13 years of operation, and reduces double counting of determinations when a previously deferred item is presented back to a DAP for a decision. The categorisation also allows a richer level of analysis of DAP determinations based on reliability, efficiency, consistency and complexity.

The following fields have been collected for each determination by a DAP:

- The determining DAP
- The financial year
- The responsible authority
- The proposal's location and description
- The proposal's category (see Appendix 1)
- RAR recommendation
- Number of conditions or reasons for refusal in an RAR
- DAP decision
- Number of conditions or reasons for refusal in a DAP decision
- Number of conditions amended, added, or deleted by a DAP
- If the RAR and DAP decision aligns
- Date proposal lodged
- Date of decision
- Project value.

Verification to remove inconsistencies and irregularities from the data was undertaken in December 2024 and January 2025.

## 2.0 Key Findings

These headline trends provide a 'snapshot' of the data that is deemed most relevant to highlight the overall performance of the DAP system over the past four years.

### 2.1 Reliability

- In the 2023-24 reporting period, the average time taken for a DAP to determine a DA was 149 days, a 2% increase since the 2020 report.
- The average processing time for all forms of decisions by a DAP was 152 days, an increase of 6 per cent since the 2020 report.
- The time taken for a DAP to determine an amendment to a DA (i.e. a Form 2) increased from 94 days to 96 days since the 2020 report.
- In the 2023-24 reporting period, the proportion of DAs taking more than 120 days to process increased to 53 per cent, up from 41 per cent from the 2020 report.

### 2.2 Efficiency

- The number of determinations made by a DAP at each meeting has increased since the 2020 report, from 1.35 to 1.52 determinations.
- The number of deferred applications as a proportion of all determinations peaked at 11 per cent in the 2015-16 reporting period, reducing since this time and is currently sitting around 8 per cent of all determinations.

### 2.3 Consistency

- Approximately 90 per cent of DAs determined by DAP align with the RAR Report. This figure is consistent with the 2020 report.
- Rates of refusal by DAPs have fallen to 4 per cent, compared to 10 per cent in the 2020 report.
- The number of proposals deferred by a DAP when the RAR recommends approval has decreased from 31 per cent in the 2020 report to 22 per cent in the 2023-24 reporting period.

### 2.4 Complexity

- The proportion of strategic and significant development proposals decreased significantly following the 2020 report, with DAs below a project value of \$5 million peaking at 47 per cent of all DAs in the 2021-22 reporting period. This has reduced to 32 per cent of DAs determined by DAPs in the 2023-24 reporting period, with 24 per cent having a project value between \$2 million to \$3 million, aligning with the percentages from the 2020 report.
- Childcare related DAs accounted for a high proportion of low value applications since the 2020 report, representing 67 per cent of DAs in the 'community' development category and accounting for 54 per cent of DAs that had a project value of between \$2 million to \$3 million in the 2023-24 reporting period.

## 3.0 Discussion

In November 2009, the then Minister for Planning, Hon Rita Saffioti MLA, advised Parliament that DAPs were being introduced to Western Australia *"to improve the planning system by providing more transparency, consistency and reliability in decision making on complex development applications."* Subsequent amendments to improve the DAP system were undertaken in 2013, 2015, 2016, 2020 and 2024.

Analysis of the data shows that there has been a slight improvement in consistency DAP decisions over the last four years. Over the same period there has been no significant change in the efficiency of DAP decisions.

Since the establishment of the DAPs system in 2011, the average processing time for DAs, Form 2 applications and deferred DAs (DA Ds) have generally increased. This trend seems to have stabilised, with the average processing time for all forms of decisions by a DAP now standing at 152 days. This is a negligible increase from the 2020 report yet double the average number of days in the first year of the DAP system.

Further, the proportion of DAs that take more than 120 days to determine, which now stands at 53 per cent of determinations compared to 41 per cent in the 2020 report. This is reflected in the rate that DAP applications are determined within statutory timeframes, sitting at mid-70 per cent between 2020 to 2023 and dropping to 66.8 per cent in 2023-24<sup>1</sup>.

The rate of alignment for DAs with RAR recommendations has remained consistent since the 2020 report at approximately 90 per cent. When alignment is considered across all categories of determinations, a slight improvement in performance is evident, with this sitting at 16 per cent in the 2023-24 reporting period, down from 19 per cent in the 2020 report.

There has been a notable decrease in the rate of refusal for DAs by DAPs, down from 10 per cent in the 2020 report to 4 per cent in the 2023-24 reporting period. This is the lowest ever percentage for this measure since the inception of DAPs. Rates of DA deferrals remain consistent at approximately 10 per cent. While this in turn means DA approval rates have increased, it still does not compare to the rate at which Local Governments approve DAs, with the Local Government Performance Monitoring Report finding that approximately 99 per cent of all DAs determined by Local Governments are approved<sup>2</sup>.

Given this, WALGA welcomed the DAP reform that became operational on 1 March 2024 that removed the mandatory monetary thresholds, allowing applicants to choose whether to go the DAP pathway or through a Local Government to obtain an approval. Given the timeframe of this report, there is insufficient data to determine if these amendments will result in fewer DAP applications.

A significant change since the 2020 report is the increase in the portion of DAs determined in regional areas, which now represents 26 per cent of all DA determinations. This increase is due to renewable energy related projects, workforce accommodation and 'industrial' developments (including rural land uses) that all received double the number of DAs over the past four years, compared to the nine previously reported years.

This highlights the need for the State Government to adopt a new State Planning Policy for renewable energy facilities, so the planning framework is fit for purpose to guide these

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<sup>1</sup> [Department of Planning, Lands and Heritage Annual Report 2023-24](#)

<sup>2</sup> [Local Government Performance Monitoring Project](#)

developments, and the need for a health check of *State Planning Policy 2.5 Rural Planning*, to ensure it provides contemporary policy guidance.<sup>3</sup>

With regard to application types, there has been a noticeable increase of determinations in the 'community' category, which along with the 'commercial' category, are the largest two categories that combined account for 44 per cent of all DAP determinations. This has been driven by a high volume of low value DAs, specifically childcare related projects that account for 67 per cent of DAs in the 'community' category. The proliferation of childcare centres since the 2020 report correlates with the Federal Governments increases to the childcare subsidy.

Conversely, the volume of determinations in the 'mixed use' category, that typically include significant developments, has seen a steady decline from the largest development category in the 2020 report at 26 per cent to 14 per cent in the 2023-24 reporting period. This decrease may be reflective of these projects being unviable in a post-COVID environment where construction and labour costs have increased. Analysis of the applications lodged to date through the permanent state significant development pathway indicates that some proposals that would have previously been determined by a DAP are now being lodged through this pathway.

It is concerning that a high portion of DAP applications continue to consist of low value DAs. This is confirmed by the significant increase in the number and proportion of proposals with project values of less than \$5 million, peaking at almost half of the DAs determined in the 2021-22 and 2022-23 reporting periods. Developments with a lower development value are unlikely to be strategic in nature yet are often resource intensive applications as those which are refused or deferred. For example, childcare and service station applications account for 48 per cent of all deferred decisions valued at less than \$5 million and 68 per cent between \$2-3m over the past four years, in comparison to 29 per cent in the 2020 report.

The DAP application cost threshold has not been increased since DAPs were introduced in 2011, and in fact was lowered from \$3 million to \$2 million in 2016. This is despite increasing construction costs, specifically post-COVID, and numerous reforms to the DAP system, including the latest major amendments in 2024. Raising the application cost threshold would divert many low-cost applications back to the Local Government determination pathway, creating a more efficient and strategic DAP system.

## Conclusion

Overall, the statistical analysis indicates minor improvements in the DAP system over the last four years, particularly in reliability and consistent decision-making. Concerningly, the DAP threshold hasn't been increased since 2011 and the DAP system continues to determine many low-value applications that lack strategic importance.

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<sup>3</sup> [WALGA's Advocacy Position 6.17 Renewable Energy Facilities](#)

## 4.0 Detailed Findings

### 4.1 DAP Applications and Meetings

Figure 1 below, shows the number of applications by determination type. The number of overall determinations has decreased since it peaked in the 2015-16 reporting period, with total determinations for the 2023-24 reporting period being at its lowest level in a decade. This change has been driven by a marked drop in all forms of determinations.

It is unclear why these have reduced, but it may be due to amendments to the DAP system that came into effect on 1 March 2024, making it an entirely opt-in pathway, the growth in use of the significant development pathway, and/or commercial drivers such as increasing construction costs and lack of available land reducing the number of applications. This trend will be monitored in future DAP reports.

The SDAU only determined 13 applications in the 2023-24 reporting period and thus is unlikely to be the primary driver behind the reduction in determinations. Unfortunately, no publicly available data exists on the number of applications that have been diverted from the DAP system to Local Government. However, WALGA has begun collecting information on opt-out DAs determined by Local Governments. Anecdotally Local Governments report that many proponents are now choosing to have proposals determined by Local Government over a DAP, indicating trust in Local Government decision making processes remain strong.

*Figure 1: Number of determinations by type*

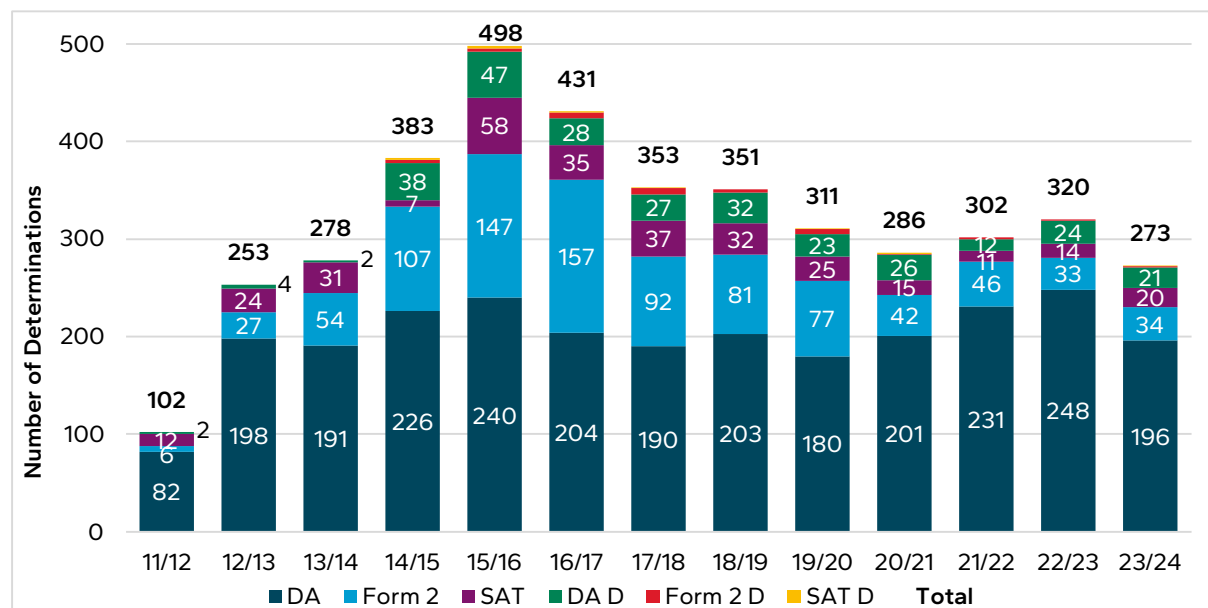
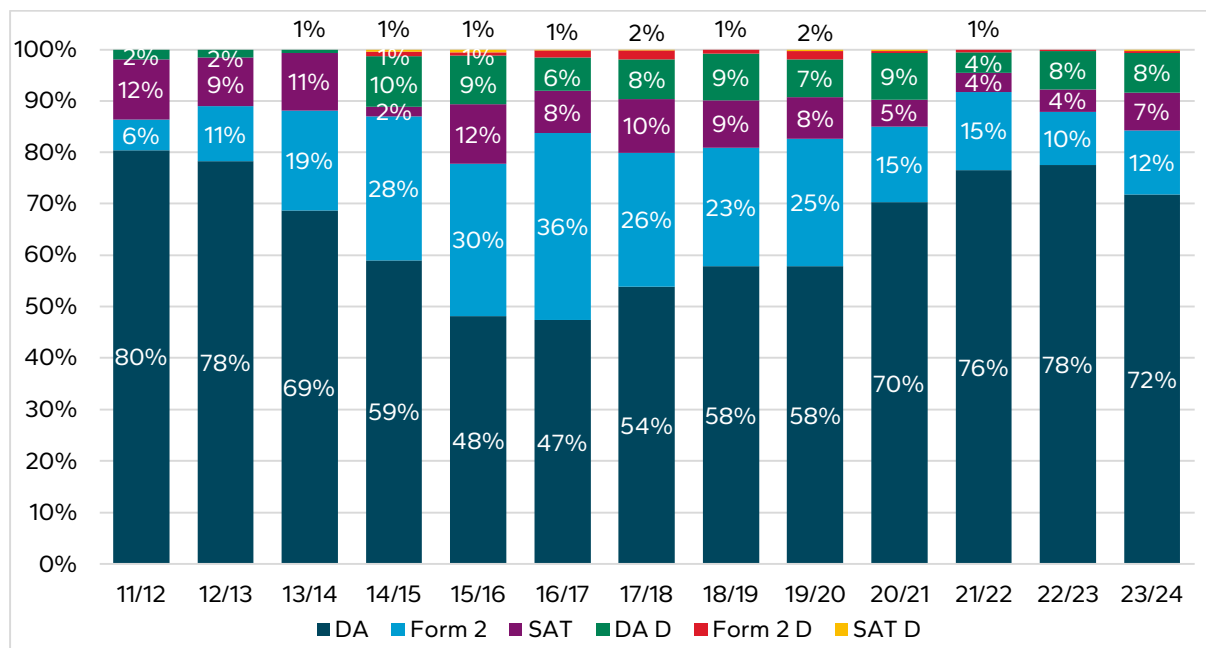


Figure 2 shows the determination type as an overall percentage of application types. From this figure, we can see a common trend beginning to show itself with regards to the proportion of each determination type accounting for total number of applications in each reporting period. There is a correlation with the decrease in total determinations and increase in DAs making up a higher portion of total determinations.

The 2015-16 reporting period recorded the highest number of determinations at 498, with DAs accounting for 48 per cent of all determinations. By the 2020 report, DAs accounted for 58 per cent of all determinations. In the last four years, DAs have accounted for at least 70 per cent of all determinations, peaking at 78 per cent in the 2022-23 reporting period.

*Figure 2: Type of determinations as percentage*



Conversely, other forms of determinations have reduced over this period. Form 2s peaked in the 2016-17 reporting period at 36 per cent, before dramatically declining when the DAP system changed in 2016, allowing applicants to choose whether to have a Form 2 application determined by a DAP or the Local Government. Form 2 determinations have continued to decline since then.

Prior to the 2020 report, Form 2 determinations accounted for at least 20 per cent of all determinations and these now only account for 12 per cent in the 2023-24 reporting period. This may indicate that applicants are increasingly choosing the Local Government pathway to determine these applications. While no publicly available data exists on the number of Form 2 applications that have been diverted from the DAP system, anecdotal evidence from Local Governments support this hypothesis.

A similar, though less dramatic trend in the data can be observed for deferred DAs. These grew by an astonishing 900 per cent from the 2013-14 to 2014-15 reporting periods, increasing from 1 per cent of all determinations to 10 per cent. However, a gradual decline in percentage of deferred DAs has been observed in subsequent years, stabilising between 4 and 9 per cent of all determinations.

SAT determinations have remained consistently low since the 2020 report, sitting between 4 and 7 per cent of all determinations. The overall small number of SAT determinations, and unique context of each application, limits the ability to draw conclusions and trends from this dataset. However, the overall trend suggests that fewer applications are being reconsidered following an appeal to the SAT, indicating potentially more effective and sound initial decisions.

In the first 4 years of the DAP system, the number of determinations made by DAPs per meeting increased, peaking in the 2015-16 reporting period at 1.92 items per meeting, as shown in Table 1. Since the 2020-21 reporting period, the number of items per meeting has increased slightly and stabilised to the current 1.52 determinations per meeting.

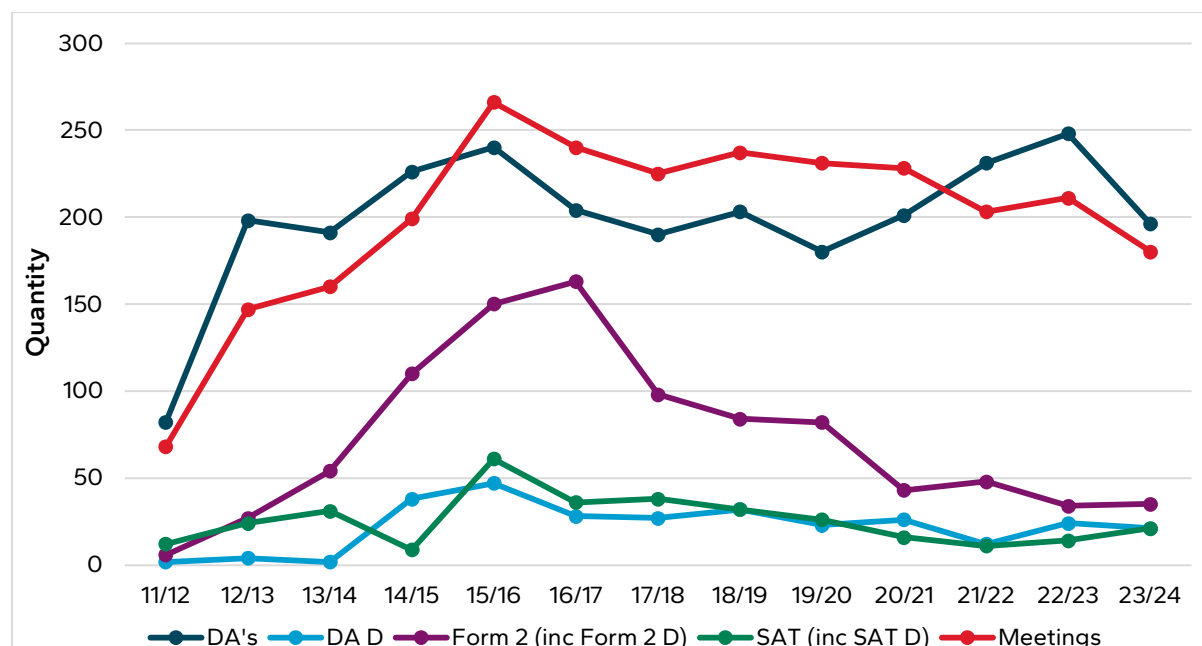
*Table 1: Number of items per meeting*

Items per meeting	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24
	1.50	1.72	1.74	1.92	1.87	1.80	1.57	1.48	1.35	1.25	1.49	1.52	1.52



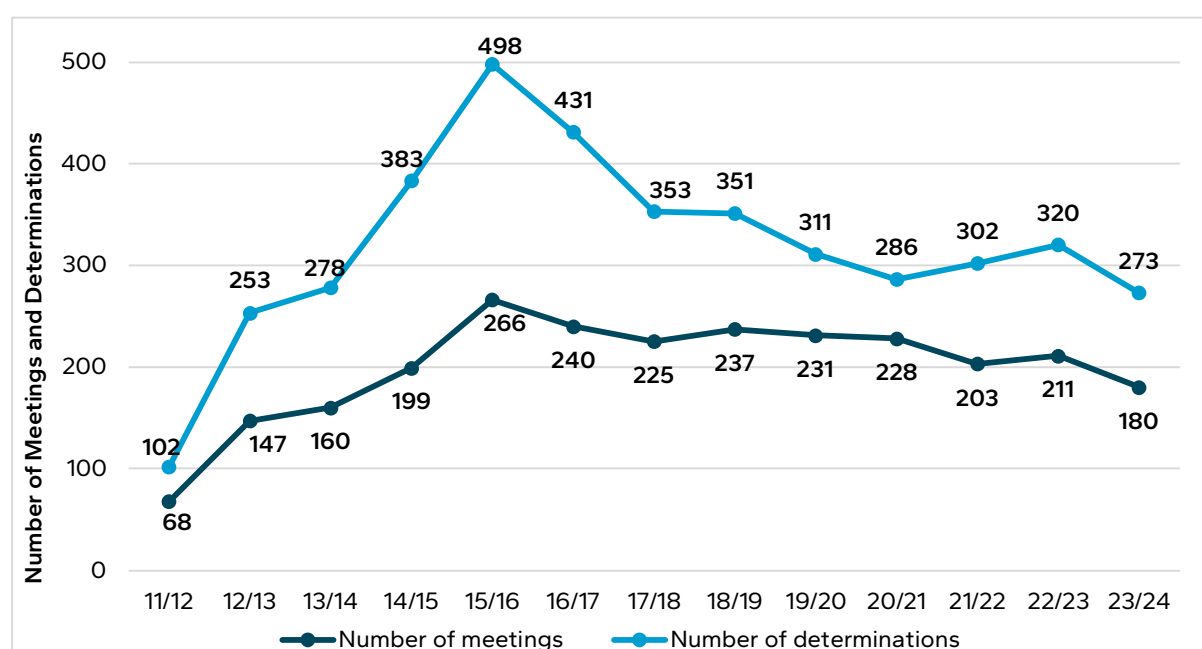
Figure 3 demonstrates that the rise in the number of determinations observed in the first 5 years of the DAP systems was accompanied by an increase in the number of meetings. Such was the growth in the number of DAP meetings that in the 2015-16 reporting period, the number of meetings exceeded the number of DAs determined for the first time. This peak corresponded with the highest volume of determinations per year, which included a high percentage of Form 2 determinations. The increased number of DAs as a total portion of all determinations since the 2021-22 reporting period may also account for the improvement seen in Figure 3.

Figure 3: Number of meetings and applications by type



Within Table 1, there is a clear reduction in efficiency which can be seen between the 2015-16 to 2020-21 reporting periods. Figure 4 shows this reduction in efficiency as the 'gap' between the two series. We can see the 'gap' grow in the years leading up to the 2015-16 reporting period, and then reduces in the subsequent years, to 1.25 in the 2020-21 reporting period, the lowest recorded.

Figure 4: Number of DAP determinations and meetings





It is too early to conclude that the improvement to meeting efficiencies in the 2021-22 reporting period is correlated to the reduction in the number of DAPs from nine to five, which occurred in April 2020. On 1 March 2024, the number of DAPs was further reduced to three panels. Given this report only includes four months of the new three panel system, there is insufficient data at this stage to determine if these amendments have improved DAP meeting efficiency.

## 4.2 DAP Decisions

Figure 5 provides an overview of all DA determinations by year as whole numbers and Figure 6 shows this as percentages. From this we can see that the percentage of approvals sat below 80 per cent for six years, between the 2014-15 to the 2019-20 reporting periods. Since then, the percentage of approvals have increased to a minimum of 84 per cent, peaking at 90 per cent in the 2021-22 reporting period.

Figure 5: DA determinations

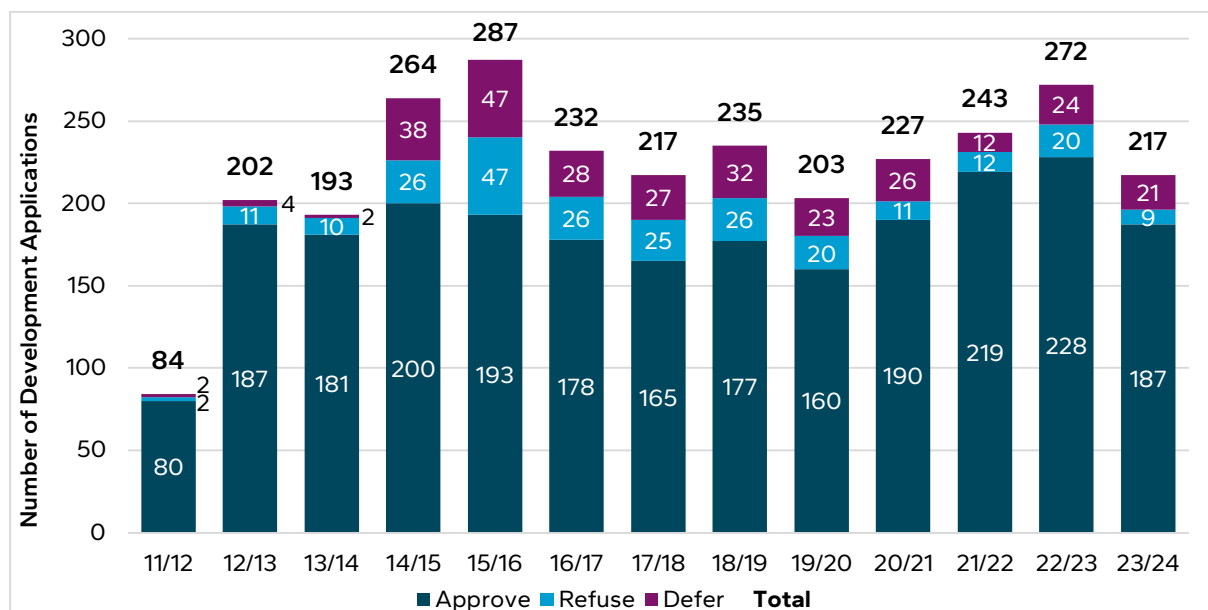
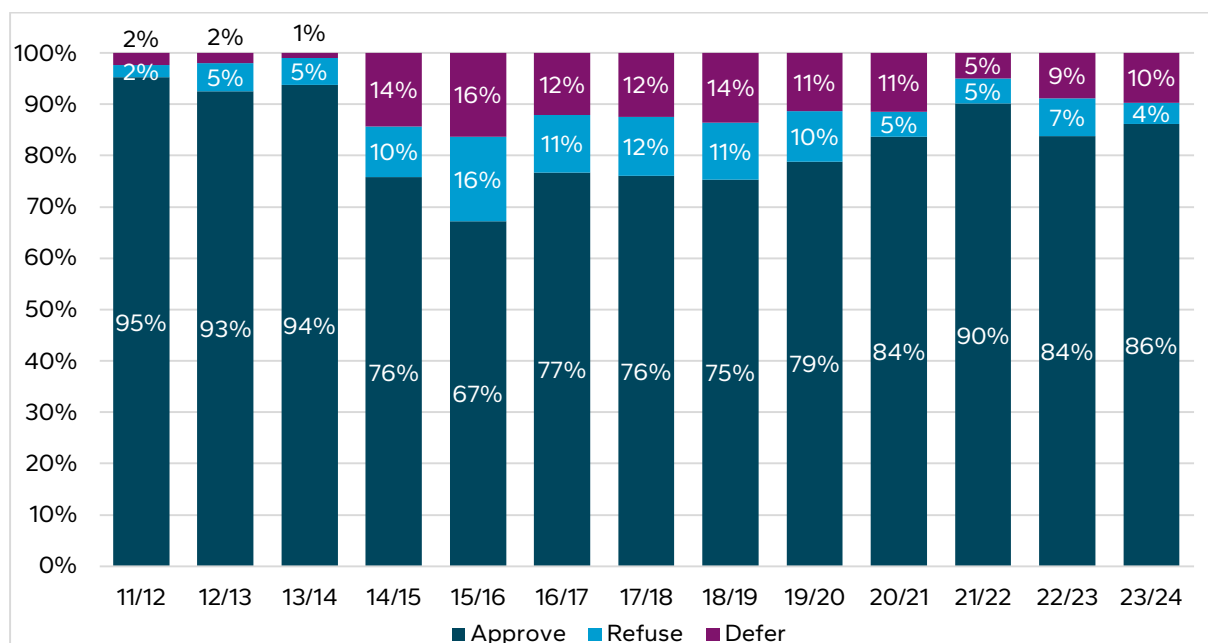


Figure 6: DA determinations as percentage





This in turn means other determinations have reduced over this period. Refusals have significantly dropped as a proportion of decisions, sitting at 4 per cent of all determinations in the 2023-24 reporting period, the lowest percentage since the DAPs were introduced.

Approximately 28 per cent of DAP refused decisions in the last four years related to service station or childcare determinations, all with a low project value of less than \$5 million. Furthermore, 48 per cent of all deferred decisions in the last four years related to service stations or childcare centres valued at less than \$5 million.

As a comparison, the rate that Local Government approve DAs outside the DAP system is a consistent rate of between 98 and 99 per cent over the past eight years<sup>4</sup>. Therefore, although the DAP approval rate has increased, there remains a clear discrepancy between the rate at which Local Governments approve DAs compared to DAPs.

While the final decision of a DAP is important, the recommendation of the responsible authority is another important indicator as to the effectiveness and efficiency of the DAPs system. The DAP alignment rate for all DAP decisions has increased slightly since the 2020 report, with non-alignment at approximately 16 per cent of all determinations, down from an average of 19 per cent in the 2020 report.

Figure 7 below shows the rate at which the RAR recommends that a DAP 'approve' all DAs, as well as the rate that the DAP aligns with the recommendation for approval. The rate at which a DAP supports a recommendation for approval has always been consistently high. Given the higher rates of approval following the 2021-22 reporting period, it is not surprising that this rate has increased even more and remains consistent at 97 per cent.

*Figure 7: DA RAR approval rate and DAP alignment*

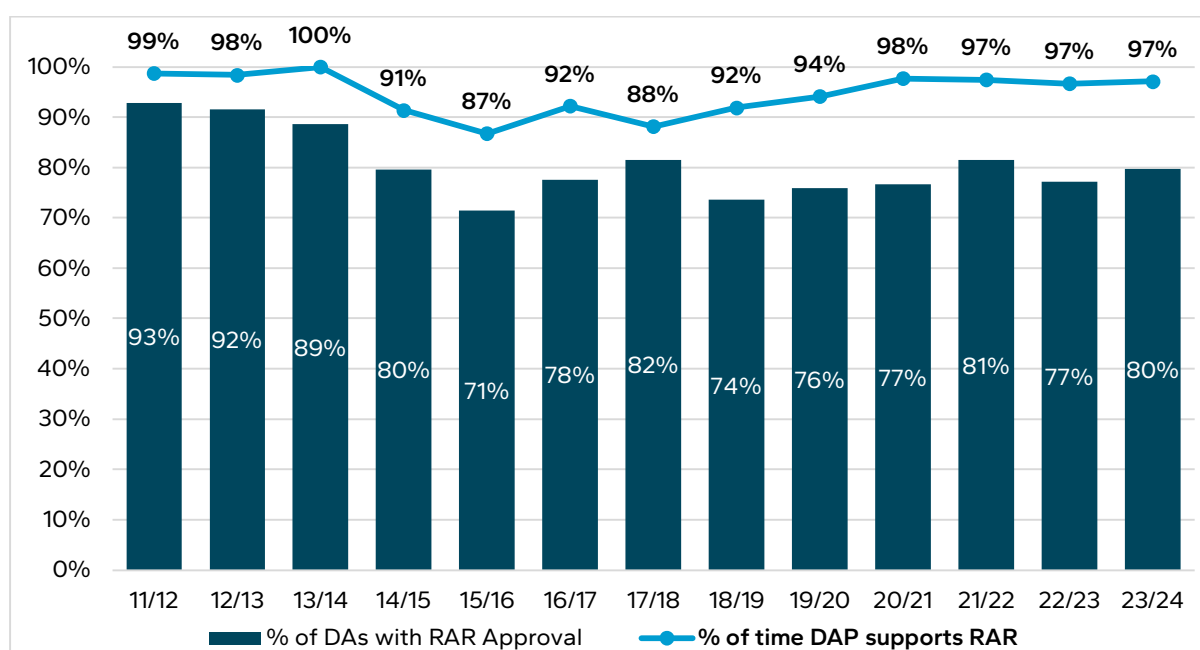


Figure 8 shows that the rate of DAs that the RAR has recommended for refusal has decreased slightly since the 2020 report to less than 20 per cent. However, the percentage of time a DAP supports the RAR recommendation for refusal has also decreased, dropping to a record low of 22 percent alignment in the 2023-24 reporting period.

<sup>4</sup> [WALGA's Local Government Performance Monitoring Project](#)

Figure 8: DA RAR refusal rate and DAP alignment

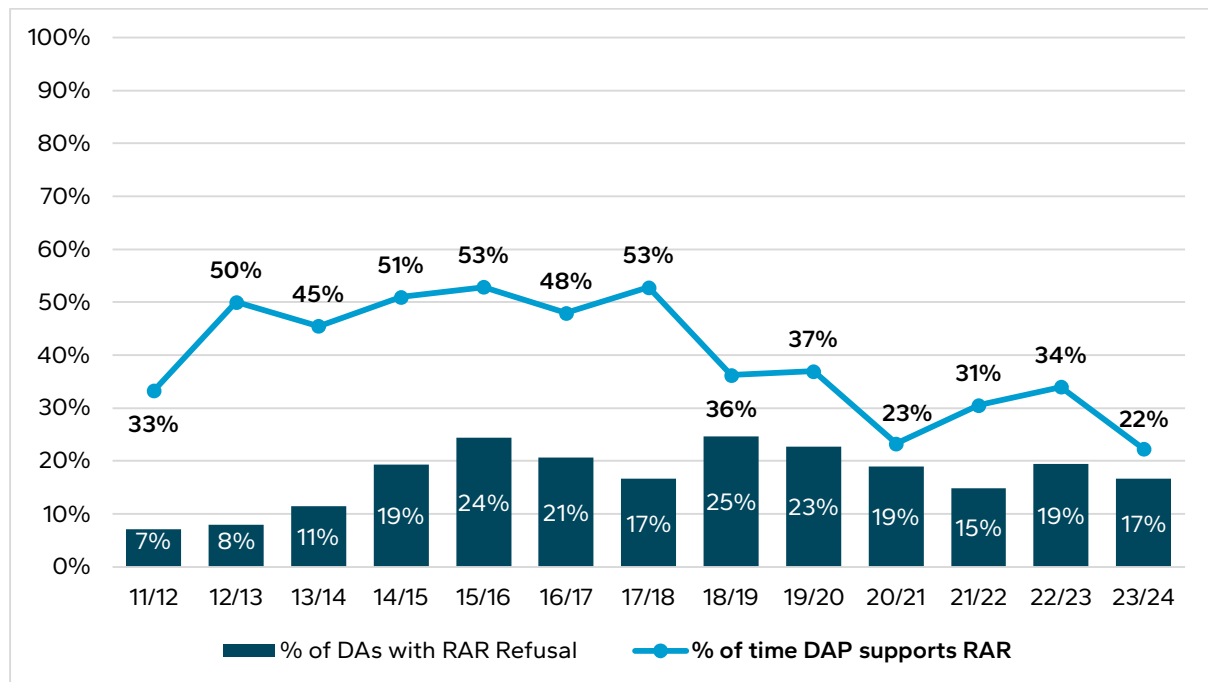


Figure 9 shows the total number of decisions deferred each year, as well as the RAR recommendation, while Figure 10 shows the RAR recommendations of the deferred decisions as a percentage. Interestingly, in the 2020 report, none of the deferral decisions included an RAR deferral recommendation. Since then, there has been a growing trend for the RAR to recommend deferral, with 30 per cent of deferred determinations having an RAR deferral recommendation.

Not surprisingly, the data demonstrates that the highest portion of deferred applications were recommended for refusal, with the number of approval recommendations reducing since the 2020 report and currently sitting at approximately 22 per cent of all deferred determinations.

Figure 9: Number of DAP deferrals by RAR recommendation

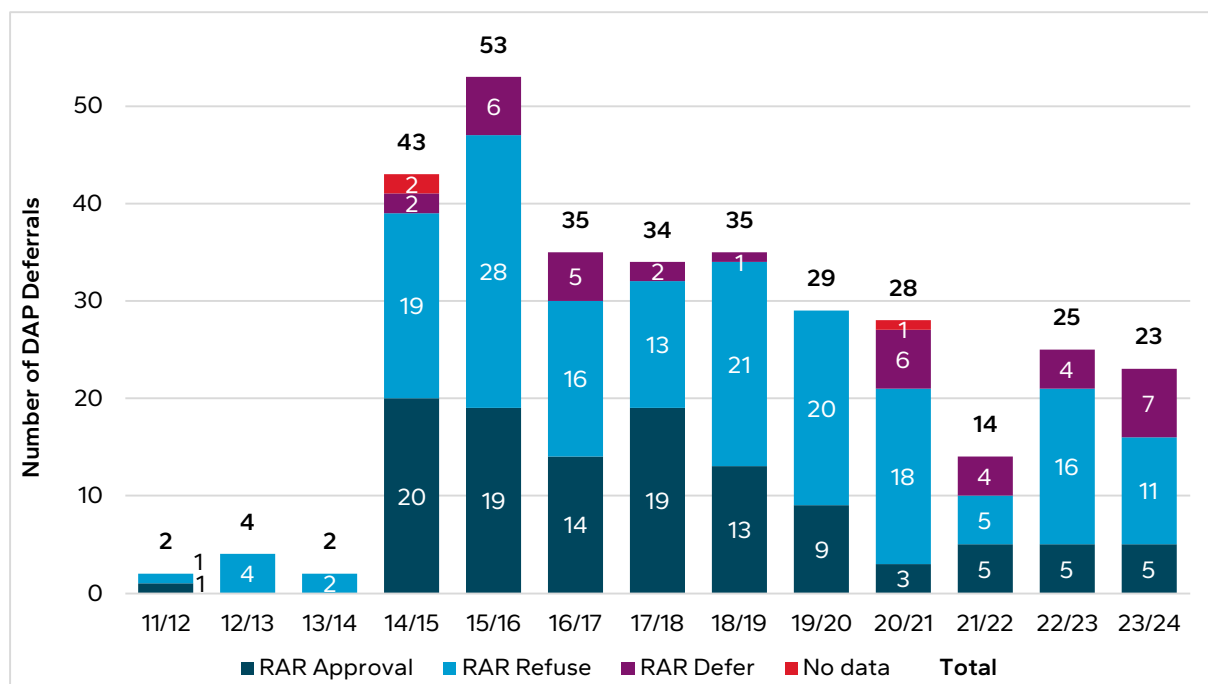
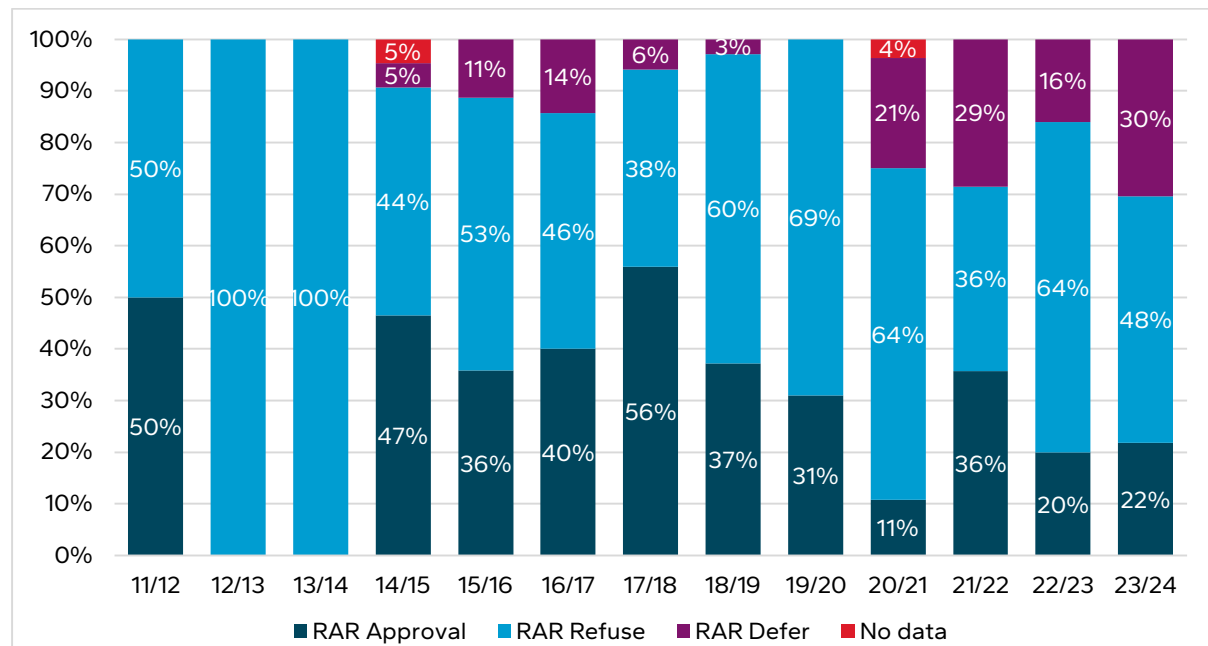


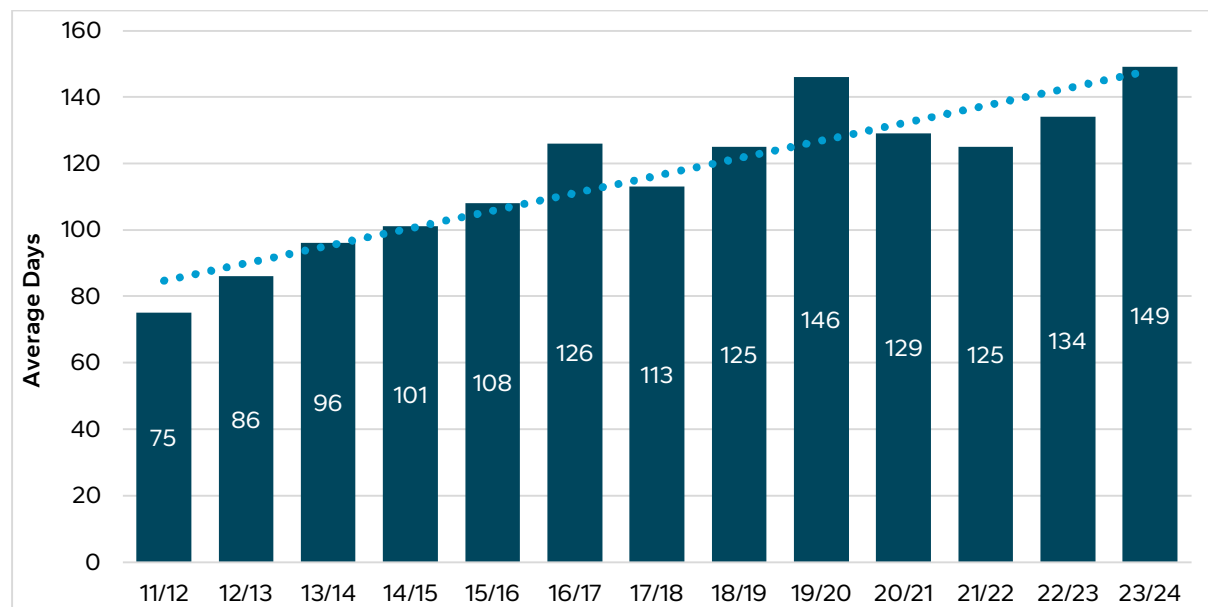
Figure 10: DAP deferrals as percentage



### 4.3 DAP Decision Making Timeframes

Figure 11 shows that the average time taken to determine a DA reduced in the three years after the 2020 report yet peaked again in the 2023-24 reporting period at 149 days, representing a minor increase of 2 per cent.

Figure 11: Average time taken to determine DAs



The statutory timeframe to determine a DA is 60 days, or 90 days if advertising or referral is required.<sup>5</sup> Due to the inconsistent manner in which information was historically portrayed in DAP agenda items, it is difficult to draw a direct comparison between average days and the proportion of applications determined within statutory timeframes.

<sup>5</sup> [Clause 75 Planning and Development \(Local Planning Scheme\) Regulations 2015](#)



Further to this, changes to the *Planning and Development (Local Planning Scheme) Regulations 2015* were introduced in 2021 to include 'stop the clock' provisions which allowed for periods of time to be excluded from the statutory timeframe so applicant's could provide additional information. 'Stop the clock' information has not been provided in a consistent manner in DAP agenda items and thus has not been captured by this Report.

Regardless, Table 2 below outlines the average days it takes to determine an application for DAs, Form 2's and deferred DAs for each year. From this, we can see that decision are trending towards longer decision times, albeit numbers have fluctuated over the last four years of reporting. The higher processing days for the 2023-24 reporting period is unexpected, given the the total number of DAP determinations was at its lowest level in a decade.

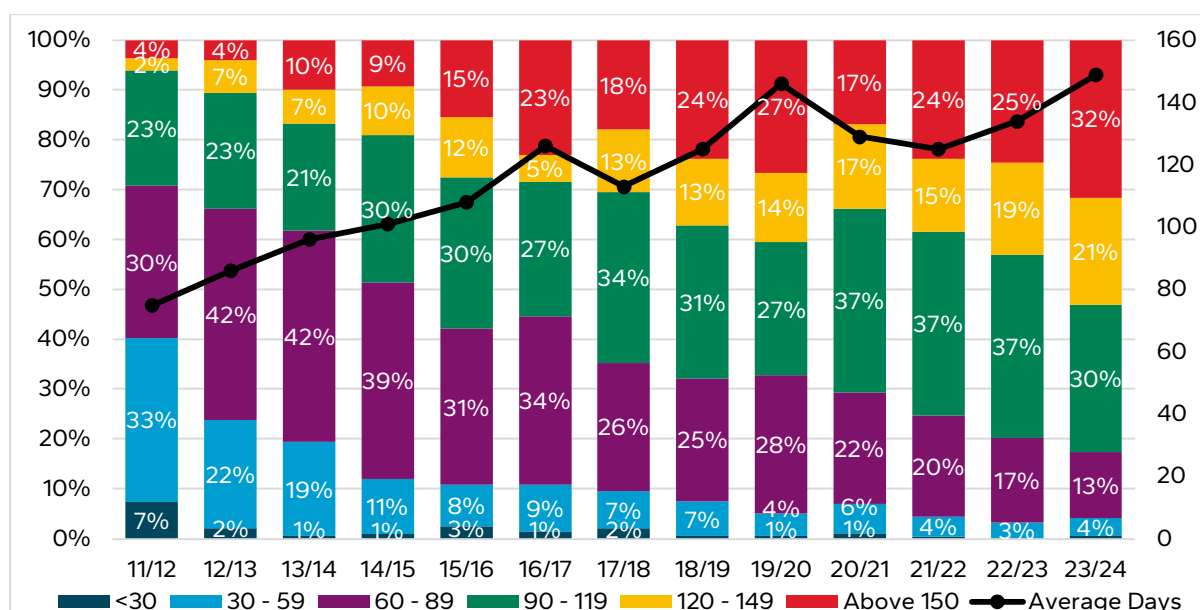
*Table 2: Average days by decision type*

	11-12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23	23-24
DA	75	86	96	101	108	126	113	125	146	129	125	134	149
Form 2	39	92	80	81	62	75	79	75	95	97	90	79	96
DA D	89	122	95	107	124	163	114	166	148	148	148	158	167

This is reflected in DPLH's Annual Report that noted that only 66.8 per cent of DAP determinations met the statutory timeframe in the 2023-24 reporting period, compared to a rate of approximately 75 per cent in the three years prior. DPLH justified the 2023-24 reporting period figure due to DAP reform changes that became operational on 1 March 2024, the complexity of applications, and the introduction of a regular meeting schedule, noting that the *'majority of delays were less than a week'*<sup>6</sup>. No additional data was included in the report to substantiate these comments.

A further analysis of timeliness data shows that the number of applications taking longer than 120 days is increasing. Figure 12 shows the proportion of all DA determination times in 30 day increments for each year. In the 2020 report, the proportion of DAs that took greater than 120 days to determine was 41 per cent, compared to 53 per cent in the 2023-24 reporting period, including 32 per cent taking longer than than 150 days. Whilst it is noted this is not reflective of statutory timeframes, Figure 12 demonstrates that in general, DAs are taking longer to process.

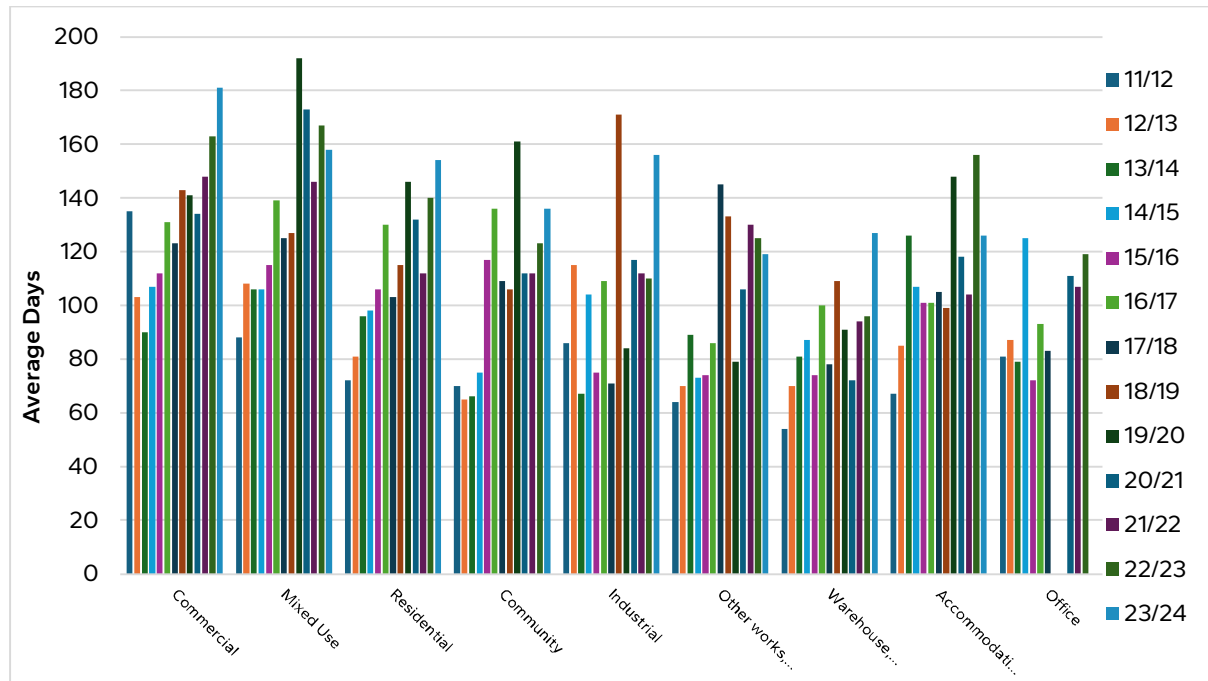
*Figure 12: DA timeliness (not including DA D) by 30 day segments*



<sup>6</sup> [Department of Planning, Lands and Heritage Annual Report 2023-24](#)

Figure 13 provides a breakdown for the average days to determine an application for all nine development use categories since DAPs were established. While there exists a range in the average days to determine a DA in the 2023-24 reporting period, there is a general trend towards longer average assessment days for most categories of development.

*Figure 13: Average days to determine DAs by category*



The time it takes to process Commercial DAs has increased to an average of 181 days, the longest time of all development categories. Mixed Used DAs also remain one of the highest average days per development category at 158 days in the 2023-24 reporting period. However, this is a decline from its peak of 192 days in the 2020 report. This improvement may relate to there being half the number of mixed use DAs in the 2023-24 reporting period than there was in the 2020 report, or an indication that more complex and controversial mixed-use proposals are choosing the significant development pathway over the DAP pathway.

Interestingly, the average days taken to determine an DA in the 'industrial' or 'warehouse, storage and distribution' categories increased dramatically from the 2022-23 to 2023-24 reporting periods by 42 and 32 per cent respectively. This may partly be attributed to three DAs in these categories exceeding 300 processing days. Notwithstanding, the 'warehouse, storage and distribution' development category still has one of the lowest average determination timeframes at 127 days. Conversely, 'industrial' DAs are now taking just as long to process as 'mixed use' and 'residential' applications at 156 days.

## 4.4 DAP Application and Development Outcomes

Historically, the vast majority of all applications determined by the DAP system are located in the Metropolitan and Peel Regions. In the 2020 report, applications in these regions accounted for approximately 87 per cent of DAs. Figure 14 demonstrates that this number has been trending down over the past several years. This is highlighted in the 2023-24 reporting period, where the Metropolitan and Peel Regions accounted for only 74 per cent of all DAs determined.

This 13 per cent increase of DAs in regional areas can be attributed to an increase in renewable energy related projects, workforce accommodations and the 'industrial' development use category (includes rural development) that all received double the number of DAs in the last four years of the reporting period compared to the previous nine years.

Figure 14: DAs determined by metropolitan and regional DAPs

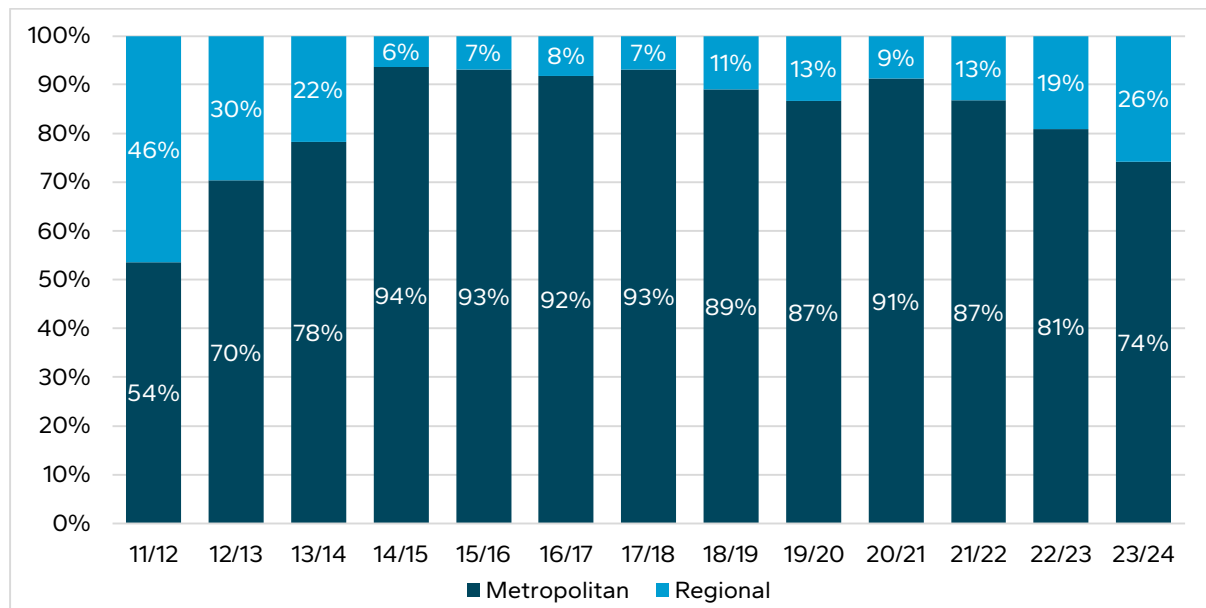


Figure 15 shows the number of determinations and development categories for each of the five DAPs between 2020-21 and 2023-24. This does not include data prior to the 2020 report as there was nine DAPs at this time, or after 1 March 2024 when the DAPs consolidated into three panels.

Metro Outer DAP by far received the most determinations with 447 applications determined in this period, accounting for 41 per cent of all DAP applications. By Local Government area, over the 13 years, the City of Stirling has received the most applications determined by a DAP with 302, followed by the Cities of Vincent and Swan (241), City of Wanneroo (207) and City of Melville (189).

Figure 15: DAP and development use category, 2020-24

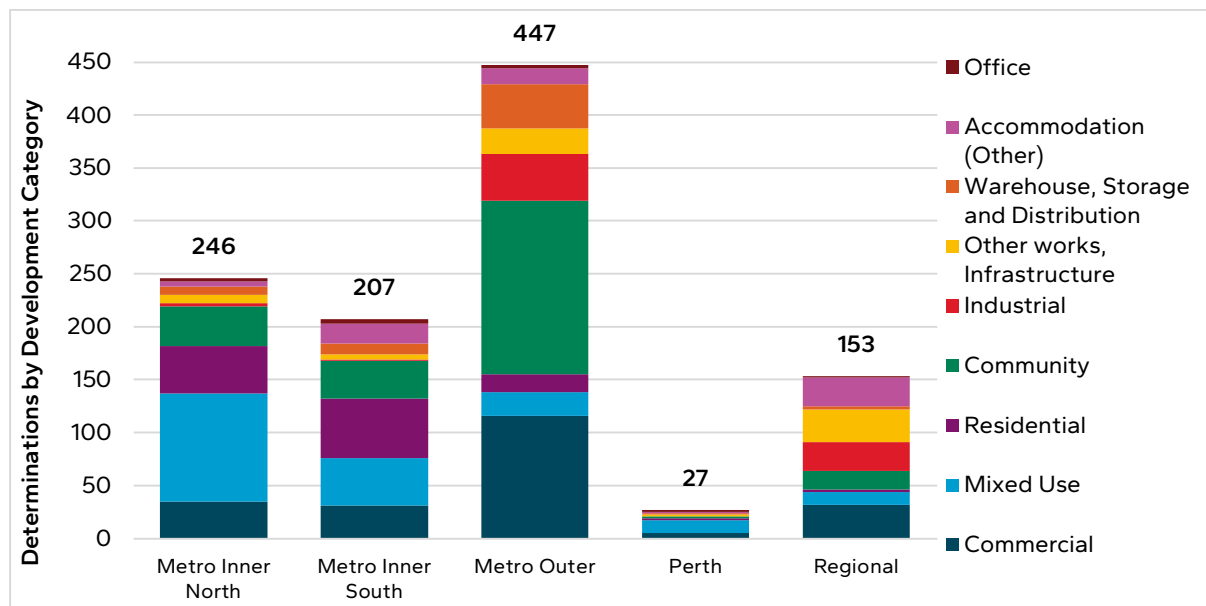


Figure 16 breaks down which DAP panels determined which development use categories via percentage. There are some obvious trends of specific development categories being located within certain regions, such as the majority of 'residential' applications being determined by the Metro Inner North and South DAPs. Unsurprisingly the regional DAP panel approved a large portion of 'accommodation (other)', namely workers accommodation, 'other works, infrastructure', namely renewable energy projects, and 'industrial' which includes rural development.

Figure 16: DAP and development use category as percentage, 2020-24

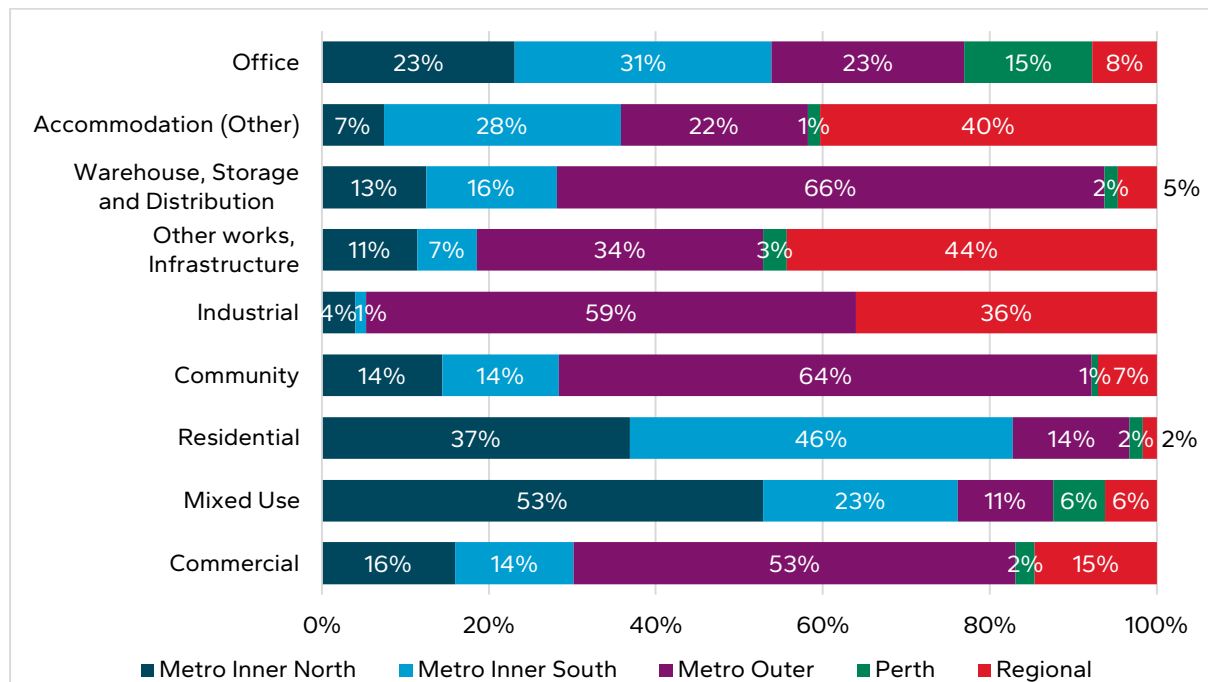
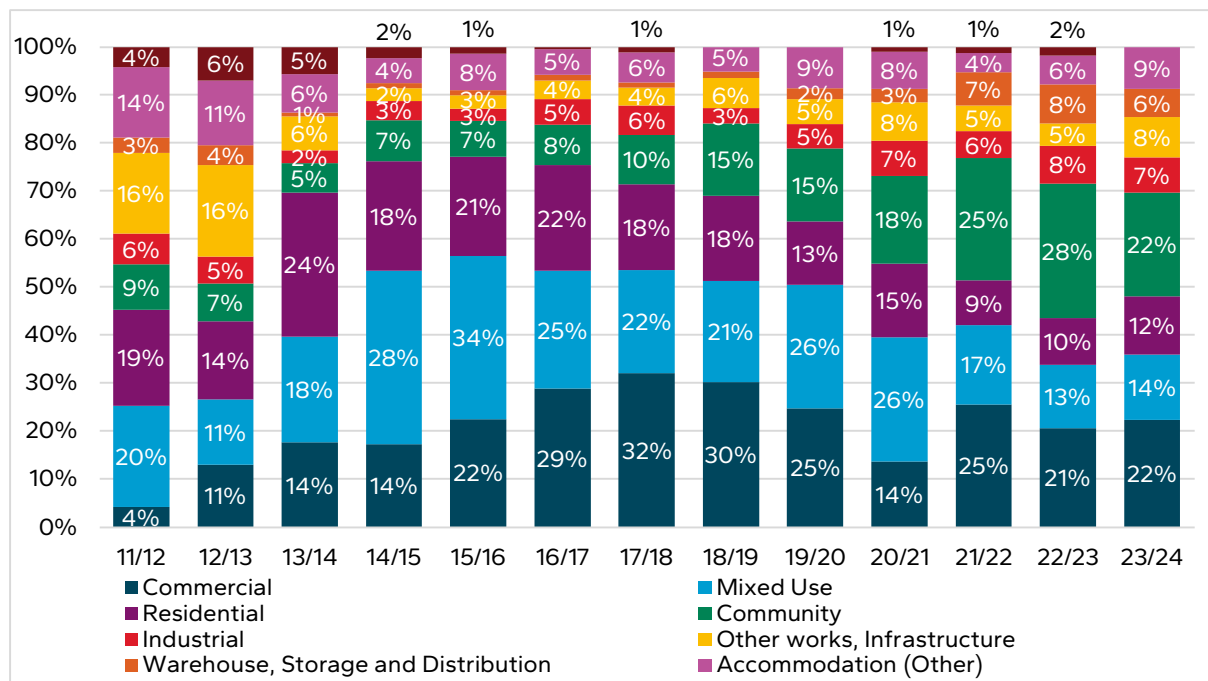


Figure 17 shows that the 'community' development use category has continued to increase since the 2020 report, representing over 20 per cent of all determinations since the 2021-22 reporting period. These applications were disproportionately located in the Metro Outer DAP, accounting for 37 per cent of all their determinations.

In the last four years, childcare related developments accounted for 67 per cent of all DAs in the 'community' category. The number of childcare developments peaked between 2021 to 2023 and have reduced in the 2023-24 reporting period, which is discussed in the section below.

Figure 17: Proportional development use category



Conversely, the number of 'mixed-use' applications have declined significantly since the 2021-22 reporting period and went from the largest land use category in the 2020 report at 26 per cent to only 14 per cent of all determinations in the 2023-24 reporting period. These trends may be a result of post-COVID increases to construction and labour costs.

Interestingly, the number of applications in the 'warehouse, storage and distribution' category has doubled since the 2020-21 reporting period and now sits at 6 per cent of all determinations.

Commercial applications were at a low of 14 per cent in the 2020-21 reporting period and since then has remained consistent at approximately 25 per cent of all determinations, aligning with the 2020 report. In the 2023-24 reporting period, service stations or fast-food outlets accounted for 46 per cent of all DAs in this category.

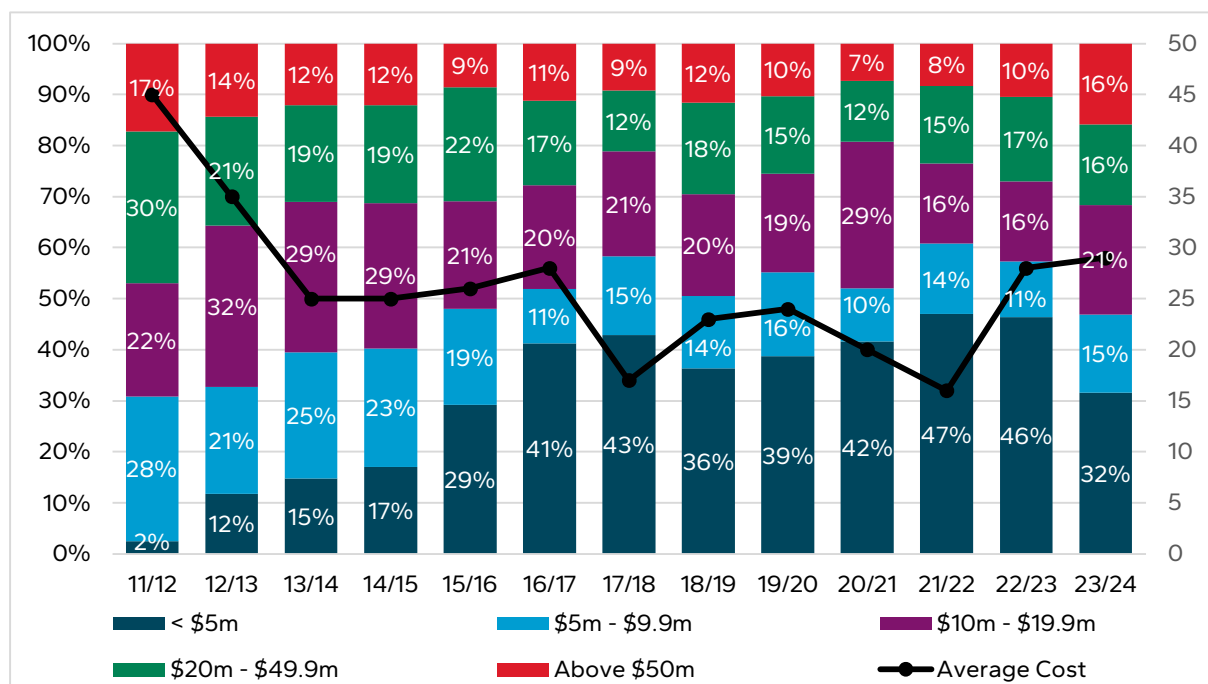
## 4.5 DAP Application Development Costs

As identified in previous reviews of the DAP system, the decision to reduce the entry threshold from \$3m to \$2m in 2016 saw a range of consequences that continue to impact the effectiveness of the DAP system to achieve its objective, which is to focus on assessing significant and more complex proposals. The DAP thresholds have not increased since this time, despite major DAP reforms in 2024 and increasing development construction costs that have accelerated post-COVID.

What has been observed since 2016 is a steady increase in the number and proportion of low-cost proposals. In the 2015-16 reporting period, 14 and 29 per cent of DAs fell within \$2m-\$3m and <\$2m value brackets respectively. However, by the 2020 report this had increased to 32 and 39 per cent.

Since the 2020 report, this trend has continued, with DAs valued at less than \$5 million hitting 47 per cent in the 2021-22 reporting period, and 46 per cent in the 2022-23 reporting period, shown in Figure 18. Interestingly, in the 2023-24 reporting period, the number of projects valued at less than \$5 million (62 DAs) was almost half the year before (115 DAs). This reduced the proportion of DAs valued at less than \$5 million to 32 per cent of DAs, the lowest percentages since the 2015-16 reporting period.

*Figure 18: Proportional DA value*

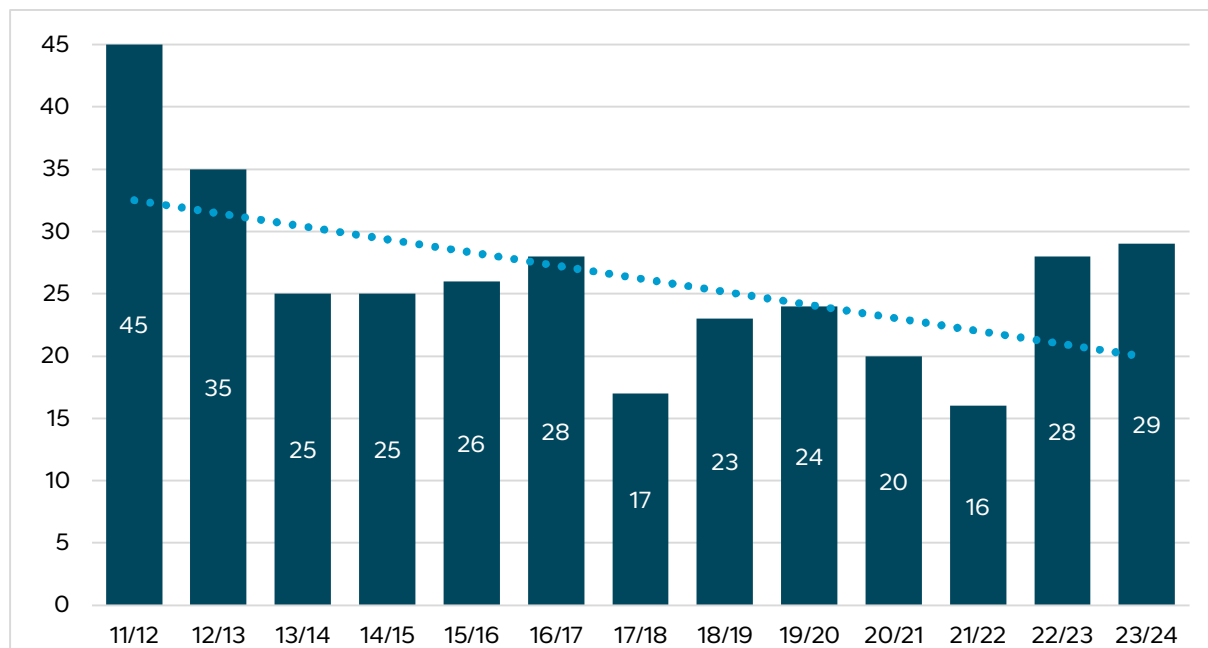




This trend correlates with a reduction in low value applications. For example, childcare related DAs peaked at 59 in the 2022-23 reporting period and reduced to 26 in the 2023-24 reporting period. Despite the reduction of 33 childcare DAs in this one year, they still accounted for 54 per cent of all DAs valued at between \$2m-\$3m. As shown in Figure 18, the proportion of DA proposals with a designated value greater than \$20m was 25 per cent in the 2020 report. This number declined in the following two years, and then increased to a total of 32 per cent in the 2023-24 reporting period.

Unsurprisingly, the rise in number of low value applications has led to a general reduction in the average value of DAs as demonstrated in Figure 19 below. Interestingly, the last two reporting period have seen a slight increase in average project value. This could correlate with a reduction of overall DAs, specifically low value DAs in the 2023-24 reporting period and is also indicative of the increasing development construction costs.

Figure 19: Average DA project value (\$m)



## Appendix 1 – Development Use Categories

<b>Accommodation (Other)</b>	Aged Care	Serviced Apartments
	Holiday - Tourist Accommodation	Workers Accommodation
	Hotel	
<b>Commercial</b>	Alcohol Licenced Premise (Pub-Bar)	Hired Goods
	Beauty Studios	Restaurant
	Car Wash	Retail
	Cinema	Shopping Centres
	Fast Food	Showroom
	Fuel Filling Station	Vehicle Sales
<b>Community</b>	Airport, Railway, Bus Station	Public Open Space
	Family Day Care	School
	Health - Medical Facility	Sporting Facility
	Library	Veterinary Hospital
	Places Of Worship	
<b>Industrial</b>	Food Production Facility- Abattoir - Mill	Recycling Facility
	Light Industrial	Vehicle Repairs & Dismantling
	Mining Operation	Workshops
	Power Station	
<b>Mixed Use</b>	Any development with multiple components that fall into different development categories	
<b>Office</b>	Office	Television Studio
	Research And Development And Laboratory Facilities	
<b>Other Works, Infrastructure</b>	Additions And Alterations	Miscellaneous Works
	Earthworks	Outbuilding
	Infrastructure Works - Substation - Water Corp Facility etc	Renewable Energy Facility
	Landfill	Vehicle Parking
<b>Residential</b>	Residential Accommodation	
<b>Warehouse, Storage and Distribution</b>	Distribution Facility	Transport Depot
	Storage	Warehousing