



# Development Assessment Panels

## **2011-20 Review**

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## 1.0 Introduction

This report follows a series of reports prepared by the Western Australian Local Government Association (WALGA or the Association) examining 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 unto the end of the 2019/20 financial year.

This report has been developed to test the Association's long held position against continuation of the DAP system in its current form and the need for various reforms to the system to ensure it operates in an efficient, effective and transparent way, and where matters of local planning context are adequately considered by decision makers.

The DAP system was established with the intention of creating a more streamlined planning assessment process and to establish a better balance between professional advice and community representation for significant development proposals. Justification for its establishment centred on the encroachment of local politics into planning decision making and the need to ensure significant proposals that align with the state planning framework are given an expedited assessment pathway.

Both justifications questioned the suitability of Local Government to continue their long held role as decision maker for development proposals and insinuated that these tasks have become less efficient and ineffective in recent years. These claims were not substantiated with quantitate evidence at the time.

In response to a number of motions from Metropolitan Local Governments in 2015 to abolish the DAP system, the Association undertook a comprehensive review of the system in 2016. That review found that the DAP system was failing to meet its aims, with reductions in reliability, efficiency and consistency of decision making, continued decrease in the proportion of strategic and significant development proposals being assessed, and a decreasing level of transparency in the DAP system overall.

Over its nine year existence the DAP system has undergone significant reform and modifications. The Minister for Planning announced a number of changes to the DAP system which came into operation at the beginning of the 2015/16 financial year. The most significant of these changes was the lowering of the 'opt in' DAP assessment eligibility criteria to development proposals with a capital works value of \$2m (outside of the City of Perth), and a reduction in the number of panels, particularly in regional areas, from 15 to 9.

The 2015/16 reforms occurred at the 'tail-end' of the 2016 review, thus the overall effectiveness or benefit of these reforms were not able to be comprehensively assessed in that report. This report provides that analysis.

Further reforms were undertaken in 2020 in response to the State Government's Action Plan for Planning Reform, reducing the number of panels from nine to five, and a range of process improvements that sought to improve consistency of information and decision making, and

enhance transparency. The Action Plan for Planning Reform outlines an ultimate final model of no more than three Development Assessment Panels for the entire State.

This report finds that the DAPs system still fails to meet its intended aims and objectives, and is in need of further reforms if these objectives are to be achieved. The report's findings use data collected over a period of nine years to formulate recommendations to WALGA's State Council for further advocacy on the DAP system.

## 1.1 Data collection method

The data in this report is collated manually from information contained in the meeting minutes and agendas of the 1,773 DAP meetings held between July 1 2011 and June 30 2020. The meeting minutes and agendas are available on the Department of Planning, Lands and Heritage's website. Data has been collected in a consistent manner, though it must be noted that how information has been reported on DAP meeting and agendas by the DAP secretariat has varied over the years, as has how this information has been provided by responsible authorities. 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); and
- 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 9 years of operation and reduces double counting of determinations when a deferred item is represented 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)
- Responsible Authority Report (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
- Disclosure of interest by DAP panel member
- Date proposal lodged
- Date of decision
- Project value
- Local Government and DAP fees

Verification to remove inconsistencies and irregularities from the data set occurred in June and July 2020.

## 2.0 Key Findings 2011-2020

These headline trends provide a ‘snapshot’ of trends in the data and observations of these trends that are deemed most relevant to highlight the overall performance of the DAP system over its nine years of operation. For further analysis, finding and recommendations related to these trends can be found in the Detailed Findings section of this report.

### 2.1 Reliability

- The time it takes a DAP to determine a development application has increased to 147 days, up 37% since the 2015/16 report,
- The average processing time for all forms of decisions by a DAP now stands at 145 days,
- The time it takes a DAP to determine an amendment to a DA (i.e. a Form 2) has increased to 94 days, up 51% since the 2015/16 report, , and
- In 2019/20 the proportion of DAs that take more than 90 days to determine was 68%, while 41% of DAs now take more than 120 days.

### 2.2 Efficiency

- The number of determinations made by a DAP each meeting has decreased since 2015/16, from 1.95 to 1.35 determinations.
- The number of deferred applications as a proportion of all determinations increased significantly to 2015/16 and has since levelled off at approximately 12% of all determinations, and
- Early analysis of the efficiency of the DAPs established in April 2020 indicates an acceleration of this trend is likely.

### 2.3 Consistency

- Approximately 90% of DAP decisions align with the RAR Report. This figure has decreases since 2011,
- The increase in the number of refusals and deferrals identified in 2014/15 has largely stabilised. Rates of refusal by DAPs are now 11-13%, down from a high of 19.5% in 2015/16, and
- The number of proposals deferred by a DAP when the RAR recommends approval has increased.

### 2.4 Complexity

- The proportion of strategic and significant development proposals assessed has decreased. 25% of all DAs determined by a DAP now have project value between \$2-3 million, and
- Anecdotally, deferred applications likely to be caused by a lack of information from proponents.

### 3.0 Discussion of Key Findings

On 18 November 2009, the then Minister for Planning advised Parliament that Development Assessment Panels (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 the DAPs system have been undertaken in 2013, 2015, 2016 and 2020 to improve the system. These regular amendments are a recognition of the continued issues and inadequacies of the DAP system.

The key findings provide clear evidence that the DAPs system continues to fail to meet its original aims and objective, and that the various reforms to the system have not improved reliability, efficiency and consistency of decision making, nor increased the proportion of strategic and significant development proposals being assessed.

Since establishment of the DAPs system in 2011, the average processing time for DAs, Form 2 applications and deferred DAs (DA Ds) have generally increased year on year. The average processing time for all forms of decisions by a DAP now stands at 145 days, double the average number of days in the first year. A breakdown of the main decision categories shows that:

- average processing time for a DA in 2019/20 was 147 days, up 37% since 2015/16 report,
- average processing time for a Form 2 in 2019/20 was 94 days, up 51% since the 2015/16 report, and
- average processing time to determine a DA D in 2019/20 was 148 days, up 19% since the 2015/16 report.

Furthermore in 2019/20 the proportion of DAs that take greater than 90 days to determine was 68%, with 41% taking more than 120 days. These timeframes far exceed the legislated timeframes for DA determination of 60 days (no advertising required) or 90 days (advertising required). Similar trends are observable in the data for both Form 2s and DA Ds. These numbers are reflected in the rate that DAP applications are determined within statutory timeframes, being 72.9% in 2018/19<sup>1</sup>.

Moving to the topic of DAP alignment with RAR recommendations. The data shows two distinct periods of consistency across the nine years. Between 2011 and mid 2015 the rate of alignment for DAs ranged between 94.8% and 96.5%. However, from 2015/16 a dramatic lift in non-alignment to 10.4% is observed. This new trend has remained consistent in the subsequent years with alignment now stabilised at approximately 90%.

When alignment is considered across all categories of determinations there is a dramatic rise in non-alignment of decision making. Simply, the rates of non-alignment double in this

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<sup>1</sup> Department of Planning, Lands and Heritage Annual Report 2018/19



scenario, with rates of non-alignment sitting at approximately 8% for the first three years, 16% for the next three, and 20% for the next. This can largely be attributed to the large increases in decisions by DAPs to defer applications.

A closer look at DA Ds in this regard shows that they are not only taking longer to determine but there has been a significant increase in the likelihood that a DAP will defer an application. The number of deferred applications increased significantly in 2014/15, doubling as a proportion of all determinations to 10% before increasing to 16% the following year. This trend has levelled off in recent years and holds steady at approximately 12% of all determinations. Perhaps of most concern is the rate at which DAPs will defer an application when an RAR has recommended an approval.

The significant rise in the number of refusals identified in 2014/15 and 2015/16 has largely stabilised in subsequent years. Rates of refusal for DAs by DAPs now sit between 11-13%, down from the high of 19.5% in 2015/16. The significant rise in occurrences of DAP refusing proposals where the RAR recommended approval seen in 2015/16 has largely reversed, with such instances reduced to between 3-5 decisions a year.

These numbers stand in stark contrast to the rates that Local Governments approve DAs, with the Local Government Performance Monitoring Report finding that 98% of all DAs assessed by Local Governments are approved.

Having the option to 'opt' into the system for all proposals would allow applicants to choose whether or not they wanted to go to a DAPs or through a Local Government to gain an approval, and hence 'opt out' of the DAPs system. A WALGA survey of Local Governments in 2016 found that within the 'opt in' threshold of DAPs at that time, 75% of applications were determined by Local Government, and that those decisions on average were made more quickly than those made by a DAP.

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### *Recommendation*

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**The abolishment of the current 'mandatory' mechanism which requires a DAP to act as the decision maker where a proposal has a value of \$10 million or greater, and replace this with an 'opt in' mechanism for all proposals.**

As was identified in the 2015/16 review of the DAPs system, the decision to reduce the entry threshold from \$3m to \$2m saw a range of negative consequences that have reduced the effectiveness of the DAP system to achieve its aims and objectives by focusing on assessing significant and more complex proposals. There has been a steady increase in the number and proportion of proposals that falls within the \$2m-\$3m value range. In 2015/16, 10% and 29% of proposals fell within \$2m-\$3m and <5m value brackets, respectively, however in 2019/20 this has increased to 26% and 38%, respectively.

Developments with a lower development value are unlikely to be strategic in nature, such as proposals for service stations and small scale residential developments, and they are considerably more likely to be refused or deferred by a DAP.

Raising the application cost threshold would remove the low cost, simple applications, the vast majority of which would be determined under delegation by Local Government. Given that these correlate to the large proportion of resource intensive applications, being those that are either refused or deferred, would help to deliver greater efficiency within the planning assessment process.

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### *Recommendation*

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**Raising the DAP threshold from the current \$2 million back to \$3 million**

### **Conclusion**

Overall, the findings of the statistical analysis of the DAPs system supports the long held position of the Association that the DAPs system was ill-prepared and is in need of significant reform for it to achieve its objectives of greater transparency, consistency and efficiency in decision making on significant planning applications.

## 4.0 Detailed Findings

### 4.1 DAP Applications and Meetings

Figure 1 below, shows that following the initial establishment of the DAPs system, year on year, the total number of DAs determined by DAPs increased steadily until 2015/16, following this a steady declining trend can be observed. Interestingly, the lowering of the monetary threshold for which DAs are eligible to be assessed by a DAPs, the number of DAs assessed grew by just 7% during the 2015/16 financial year to total 238 applications determined.

A similar trend can be observed for Form 2 determinations, where following the initial year a rapid increase in the number of Form 2 determinations can be observed, with a 481% increase between the years 2012/13 and 2016/17. However, in subsequent years an equally dramatic decline can be observed with a 41% reduction to 2017/18 before levelling off to a more gradual decline. The reduction in the number Form 2 applications aligns closely with the introduction of the ability applicants to choose whether to have a Form 2 application determined by a DAP or the Local Government. Unfortunately no publicly available data exists on the number of Form 2 applications that have been diverted from the DAP system.

#### Recommendation

**That WALGA consider the possibility of collecting data related to diverted Form 2 applications as part of the Local Government Performance Monitoring Project.**

With regard to deferred DAs, a similar though less dramatic trend in the data can be observed. DA Ds grew by an astonishing 2250% from 2013/14 to 2014/15 growing from 1% of all determinations to 10%. A more gradual decline in percentage of DA Ds has occurred in subsequent years, with them accounting for between 6% and 9%.

Figure 1: Number of Applications and Meetings, 2011-20

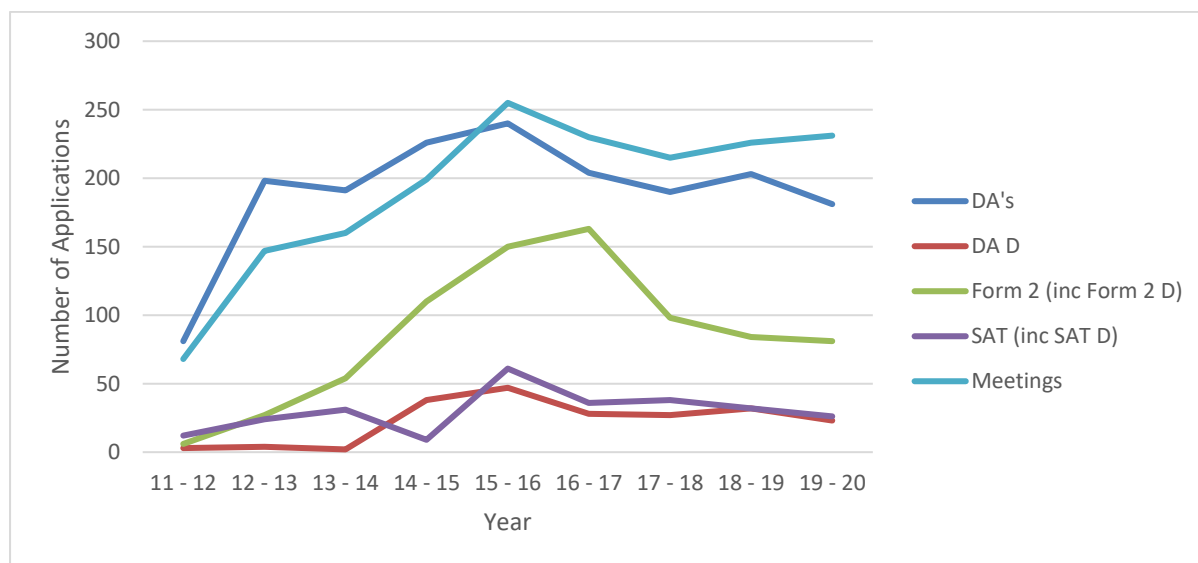
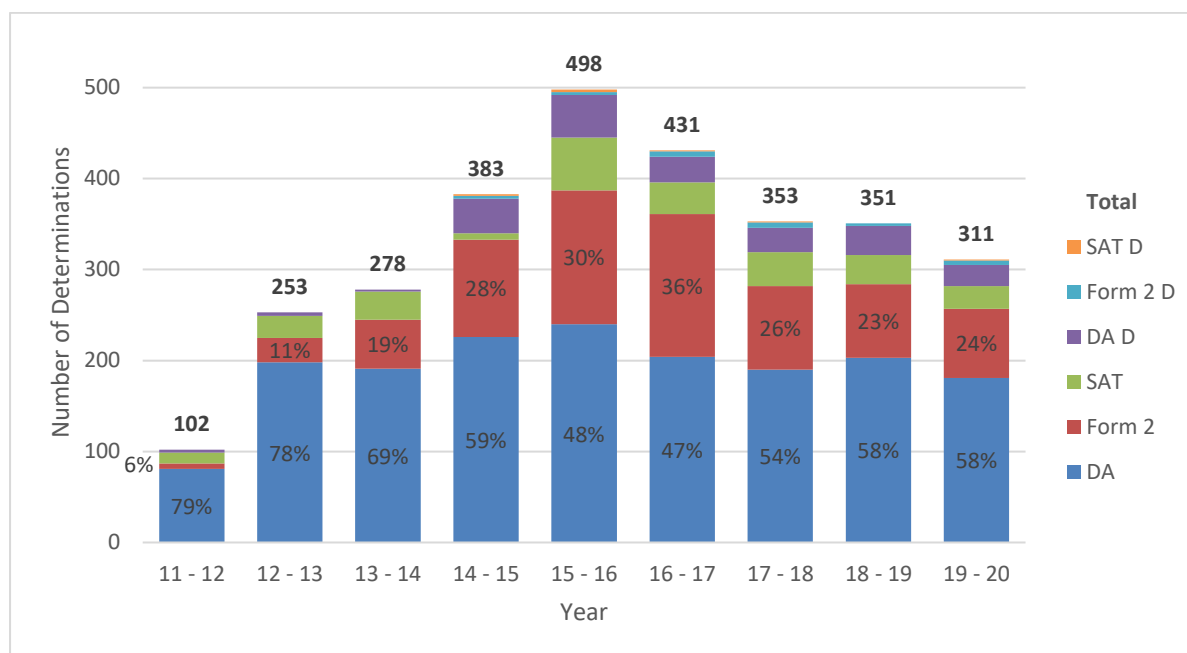


Figure 2 below, shows the number of applications by determination type. Within the columns of this graph the percentage totals for both DAs and Form2s can be observed. From this we can see a common trend beginning to show itself, with regards to the proportion each determination type accounts for in each financial year. For the years 2017/18 to 2019/20 DAs and Form 2 determinations have consistently accounted for approximately 55% and 25% of all determinations, respectively.

Figure 2: Number of Determinations by Type



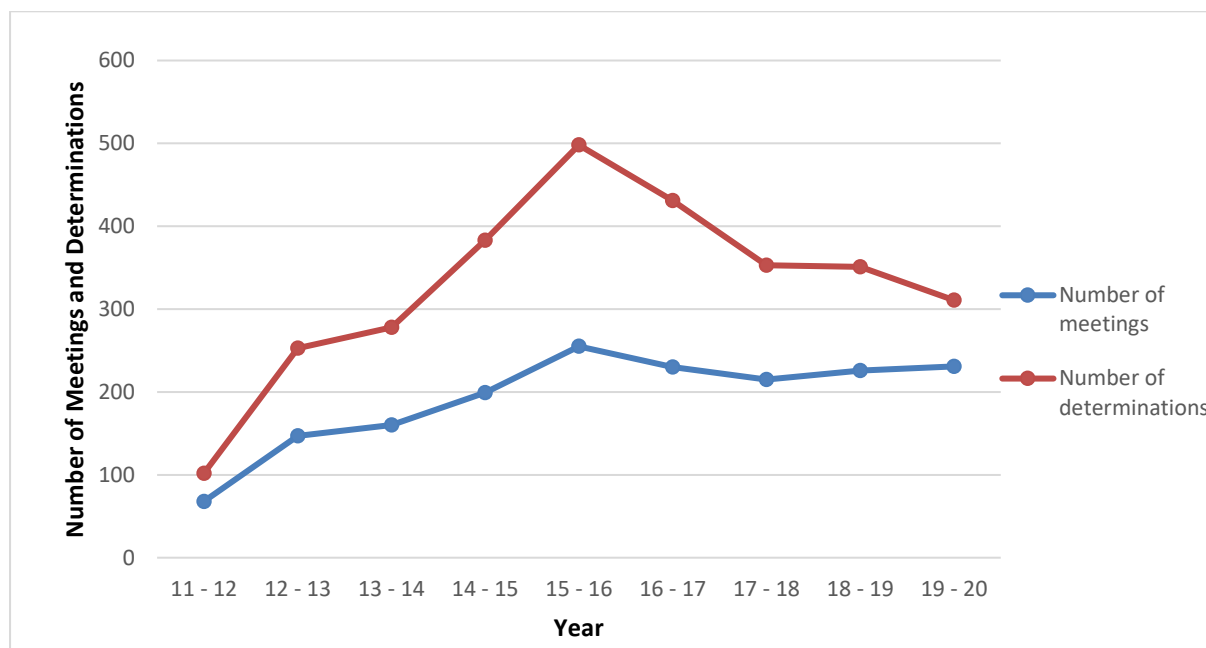
The rise in the number of determinations observed in the first 5 years of the DAP systems was accompanied by an increase in the number of meetings. Over the same the number of determinations made by DAPs per meeting increased, peaking in 2015/16 at 1.95 items per meeting. In the proceeding 4 years the number of determinations reduced, dropping 38% between the peak year of 2015/16 and 2019/20. However, in that time a continued increase in the number of DAP meetings can be observed, that has led to a decline in the number of items per meeting, with this reducing to 1.35 in 2019/20, the lowest recorded.

Table 1 and Figure 3 below illustrate this trend. Within table 1 a clear reduction in efficiency can be seen following 2015/16. While Figure 3 shows this reduction in efficiency as the 'gap' between the two series. We can see the 'gap' grow in the years to 2015/16, and then reduce in the subsequent years. The current trend in this measure points to a continued reduction in the number of items per meeting.

Table 1: Number of items per meeting by year

DAP	11 - 12	12 - 13	13 - 14	14 - 15	15 - 16	16 - 17	17 - 18	18 - 19	19 - 20
Number of items per meeting	1.50	1.72	1.74	1.92	1.95	1.87	1.64	1.55	1.35

Figure 3: Number of DAP Determinations and Meetings



Such has been the growth in the number of DAP meetings that in the 2015/16, the number of DAPs meetings exceeded the number of DA determined for the first time, a trend that has continued every year. Interestingly this trend has accelerated following the amalgamation of the original DAPs in 2016. Figure 4 below shows the number of meeting held by each DAP, with meetings assigned to the relevant DAP as established in 2016.

Further analysis of the number of meeting held by each DAPs before the amalgamation shows the underlying rationale for the amalgamation of regional and rural DAPs into three larger DAPs. Most regional DAPs met only a handful of times a year and often went more than a year between meetings. One of the stated aims of the amalgamation reforms was to create a more efficient system. From the data collected for this report, this aim has not been achieved.

From early analysis of decision data collected from the 'newer' DAPS established in April 2020 we can see an early indication of the continued downwards trend in meeting efficiency. Table 2 below outlines the number of items presented to each meeting between their establishment and the end of the reporting period for this report. All of these are below the overall average of 1.35 items per meeting.

Table 2: 'Newer' DAP meeting efficiency 2019/20

	Meetings	Items	Items per meeting
Metro Inner North	15	20	1.33
Metro Inner South	6	8	1.33
Metro Outer	15	18	1.20
Regional	7	9	1.29

Note: Perth LDAP determined only 1 item between April to July 2020, this has been excluded from this table.

## 4.2 DAP Decisions

Figure 5 and 6 below, provide an overview of decisions by DAPs by year as whole numbers and percentages, respectively. From this we can see a both doubling of decisions to refuse and a significant increase in decisions to defer, respectively, beginning in 2014/15. Since that time there has been general consistency of the number of matters DAPs has determined to defer or refuse, with both of these measure siting between 10% and 12% since 2016/17.

To this end, we can see that DAPs will approve a DA in approximately 75% of the time.

Figure 4: DAPs - DA Determinations

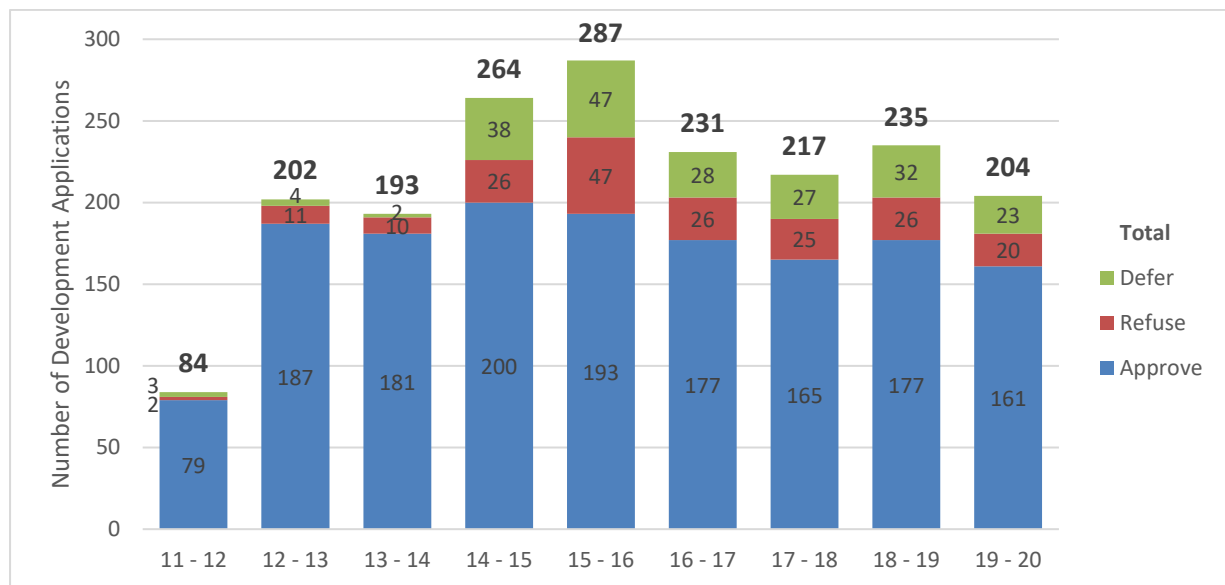
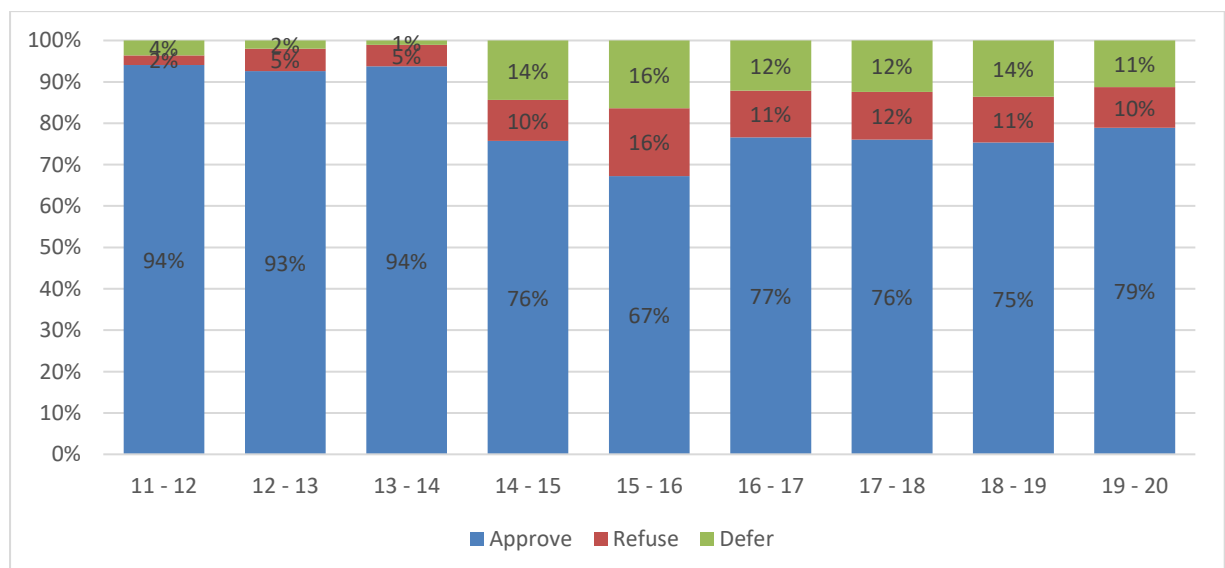


Figure 5: Figure 3: DAPs - DA Determinations as Percentage



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. Figure

6 below shows the rate at which the RAR recommends that a DAP ‘approve’ a DA. A decline in this rate from greater than 90% in the first three years of operation to consistently around 80% since 2014/15. The rate at which a DAP supports a recommendation for approval has remained consistently high across the nine years, with the rate never dropping below 95% alignment.

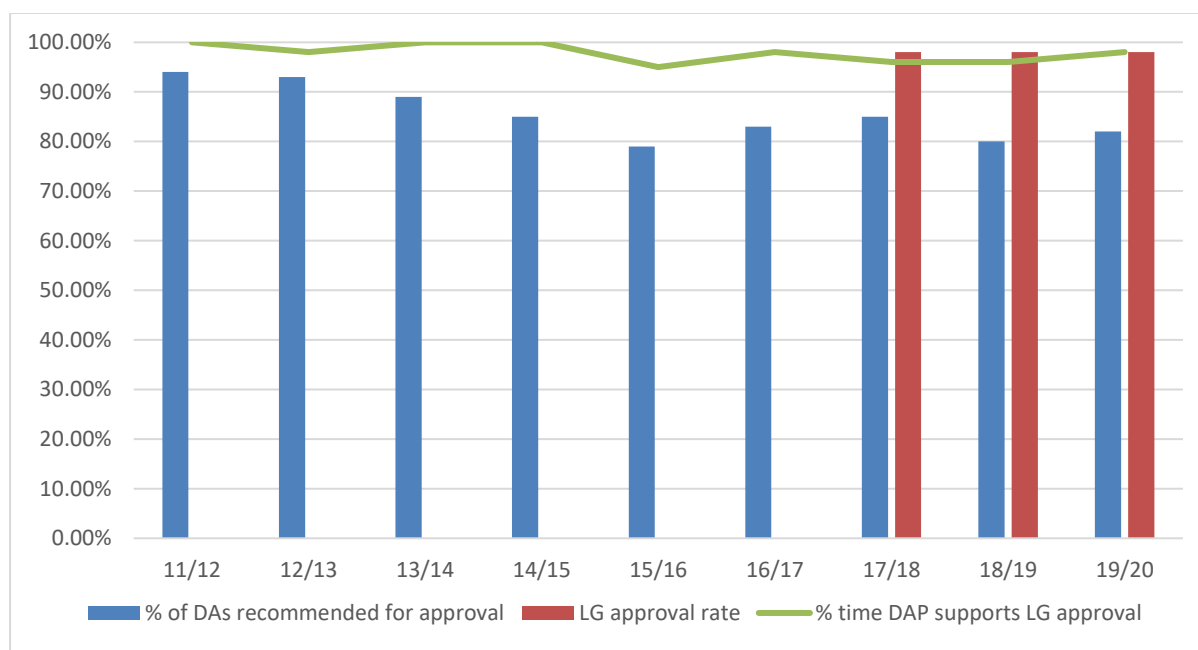
As a comparison Figure 6 includes the rate at which Local Governments approve DA’s outside the DAP system. From this we can see a consistent rate of 98% for all three years that data has been collected. There is a clear discrepancy between the rate at which Local Governments approve DAs against the rate at which they recommend approval to a DAP. The reason for this discrepancy is not clear from the data collected; but anecdotal commentary from Local Governments is that the need to gain consent to extend the assessment timeframes, when additional information is required, leads to an increase in refusal recommendations due to a lack of sufficient information to support a proposal.

WALGA’s analysis of ‘opt-out’ applications in 2016 found that for the Local Governments assessed a total of 75% of all applications with a value between \$2 and \$10 million are determined by Local Government instead of a DAP. However, the Local Government Performance Monitoring Report is unable to distinguish the approval rates and timeliness of these types of applications compared to all other DAs.

**Recommendation**

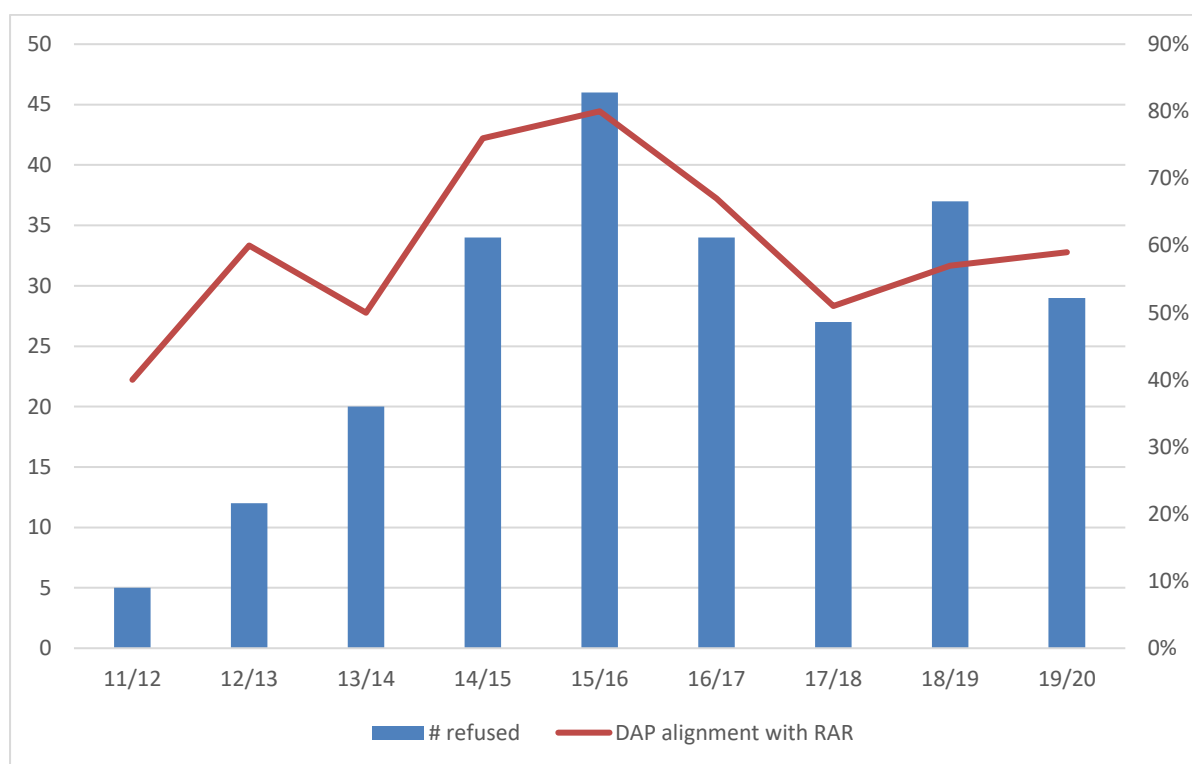
**That WALGA consider the possibility of collecting data related to ‘opt-out’ applications as part of the Local Government Performance Monitoring Project.**

Figure 6: DA RAR approval rate and DAP alignment



As outlined in Figures 4 and 5 on Page 14, DAPs refuse between 10% and 12% of all matters presented to them. While a small percentage in the overall quantum of matters determined, it is important to provide some analysis of these figures, especially in light of the disparity between DAP approval rates and Local Government DA approval rates. Figure 7 below outlines the total number of refusals per year for DA and the rate at which those decisions align with the RAR recommendation. From this we can see a general increase in the likelihood that a DAP would support a recommendation to ‘refuse’ in the years leading up to 2015/16, peaking at approximately 80% alignment. However, in the preceding years we see a steady decline in alignment, with the rate being below 60% for the past three years. There have been 353 items presented to a DAP related to a DA where the recommendation was for a refusal. In these situations the DAP determined to: refuse 163, approve 82, and, defer 108 items.

Figure 7: RAR DA refusal and RAR alignment

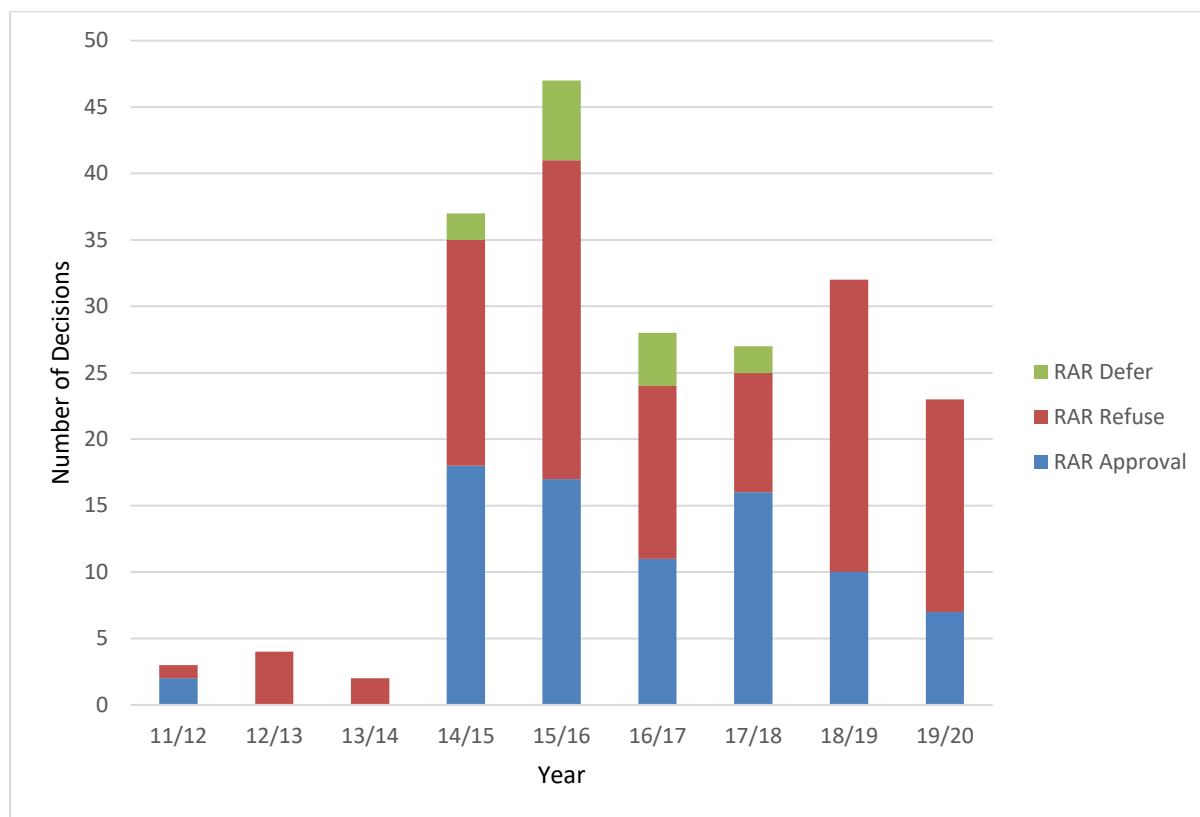


There has been a growing trend for DAPs to defer applications, including those with a recommendation of ‘approve’. Deferrals as a percentage of all decisions on DAs has elevated to approximately 15% for the last two years. In the preceding years this has subsided somewhat, however as they still make up 10% – 12% of all DA determinations it is important to provide analysis of these decisions.

Figure 8 overleaf, shows the total number of decisions to defer each year, divided by the original RAR recommendation. From this we can see the dramatic rise in both base numbers and applications recommended for approvals in 2014/15. Interestingly it was not until 2017/18 that the proportion of deferred matters recommended for approval reached its peak, at 60%. Since that year the rate has subsided again to approximately 30%, though it remains too early to determine if this is a consistent trend.



Figure 8: Number of DAP deferrals by RAR Recommendation, 2011-20



### 4.3 DAP Decisions Making Timeframes

Figure 9 shows that the average time taken by DAPs to determine a DA has continually risen year on year and now stands at 147 days. This is well beyond the required time to determine a development application which, as set out by the Local Planning Scheme Regulations, deemed provisions is 60 days, or 90 days if advertising or referral is required.

Due to the inconsistent manner in which information is 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. Further to this, inconsistent entry of dates on deferred applications and Form 2's (prior to 2015/16) makes it difficult to determine the total amount of time an application has taken from lodgement until final decision. Recent standardisation and process improvements undertaken by the DAP Secretariat has greatly improved the reporting within the agendas and minutes.

Regardless, table 3 below outlines the average days it taken to determine an application for DA's Form 2's and DA D's for each year. From this we can see that all three classes of decision are seeing trends towards longer decision times.

Figure 9: Average time taken to determine DAs by year

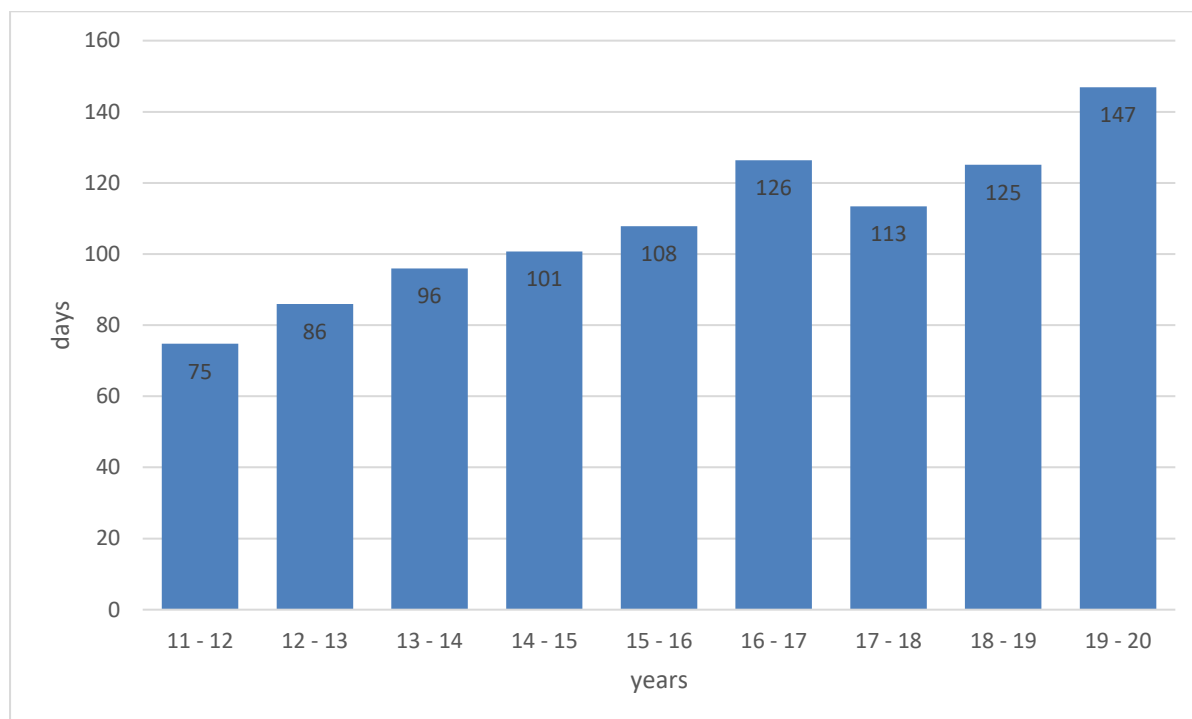


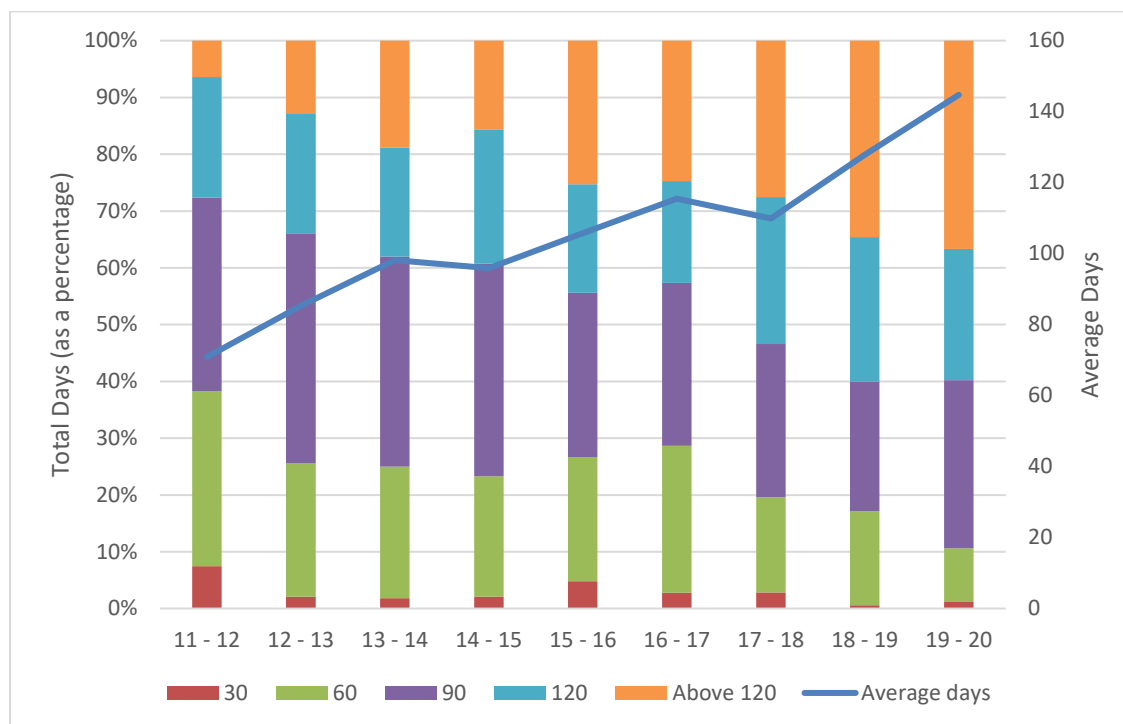
Table 3: Average days by decision type

	DA	Form 2	Deferred DA
11 - 12	75	39	78
12 - 13	86	92	122
13 - 14	96	80	95
14 - 15	101	81	107
15 - 16	108	62	124
16 - 17	126	75	150
17 - 18	113	79	114
18 - 19	125	75	166
19 - 20	147	94	148

Note: red and green boxes indicate the years with the quickest and longest average days for each category, respectively.

A further analysis of timeliness data shows that not only are DAs taking longer to assess but the number of applications taking longer than 90 days have dramatically increased in recent years. In 2019/20, the proportion of DAs that take greater than 90 days to determine was 68%, with 41% taking more than 120 days. These far exceeds the legislated timeframes for DA determination. Similar trends are observable in the data for both Form 2s and DA Ds. Figure 10 provides the proportion of all DA determination times in 30 day increments for each year of the data period.

Figure 10: DA Timeliness by 30 day segments



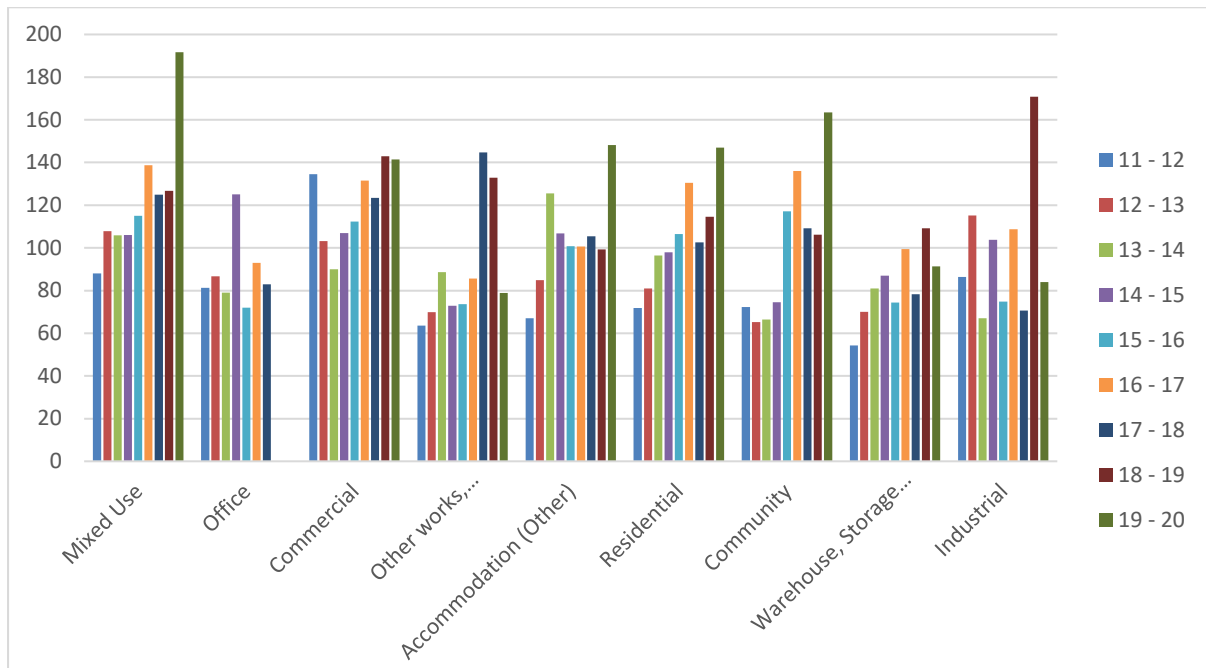
The time taken to determine an application varies significantly between development proposal categories, whilst ‘industrial’, ‘other works, infrastructure’ and ‘warehouse, storage and distribution’ applications take between 79 and 91 days to determine, ‘commercial’, ‘community’, ‘accommodation (other)’, ‘residential’ and ‘community’ proposals all took greater than 140 days to determine, in 2019/20. In the same year ‘mixed use’ proposals took 192 days on average to determine, which is striking when we consider that 73% of ‘mixed use’ proposals in 2019/20 were recommended for approval.

While there exists a range in the average days to determine in 2019/20, it is important to note that there is a general trend towards longer average assessment days for all categories of development. Figure 11 on the next page, provides a breakdown for the average days for all nine development categories between 2011 and 2019. In this we can see a general trend upwards in almost all categories, with this trend most pronounced in ‘commercial’, ‘community’, and ‘warehouse, storage and distribution’.

While it is difficult to draw any conclusive finding from this data, it is clear that there is a general trend to longer determination times for all forms of development being presented to a DAP. This trend is perhaps not unsurprising, and issues with the DAP systems that could lead to this issue were identified in 2016 when WALGA undertook a survey on the DAP System.

In support of the 2016 version of this report, 88% of respondents to WALGA’s DAPs survey reported that DAPs were either occasionally or often subject to delays. 75% of the survey’s respondents identified the main cause for delay as a ‘lack of information from proponent’.

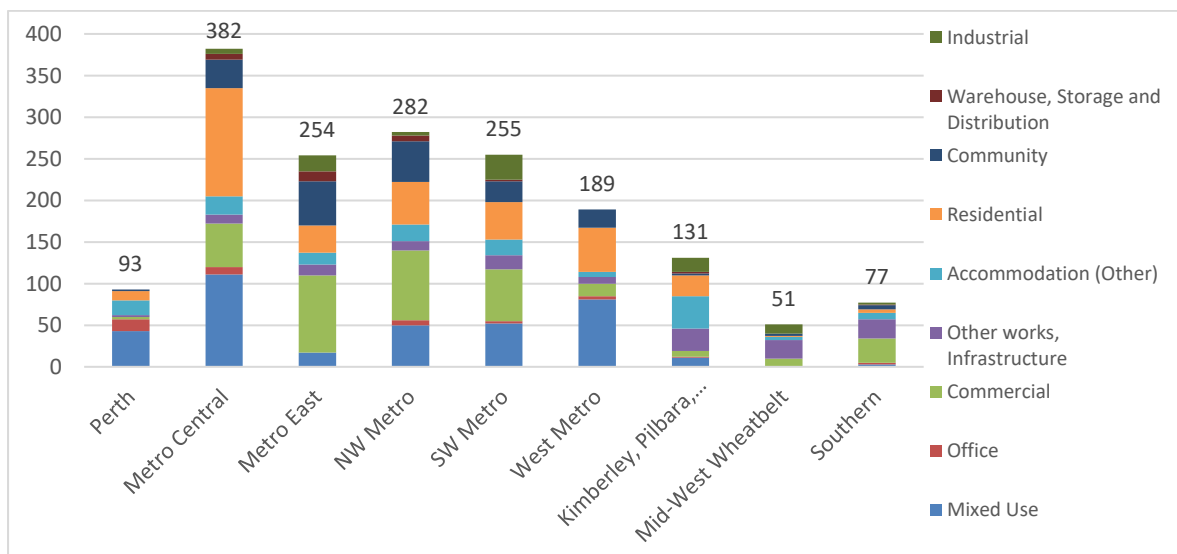
Figure 11: Average Days by Category, 2011-20



#### 4.4 DAP Application and Development Outcomes

The vast majority of all applications determined by the DAP system have been located in the Perth Metropolitan and Peel Regions, with over 85% of all DAs determined by a DAPs located within these regions in 2019/20, a trend that has been consistent throughout the nine years of reporting. Correspondingly, 92% of all 'Form 2' applications and 93% of all SAT reconsiderations are for development located within the Metropolitan and Peel regions, again a consistent trend across the nine years of reporting.

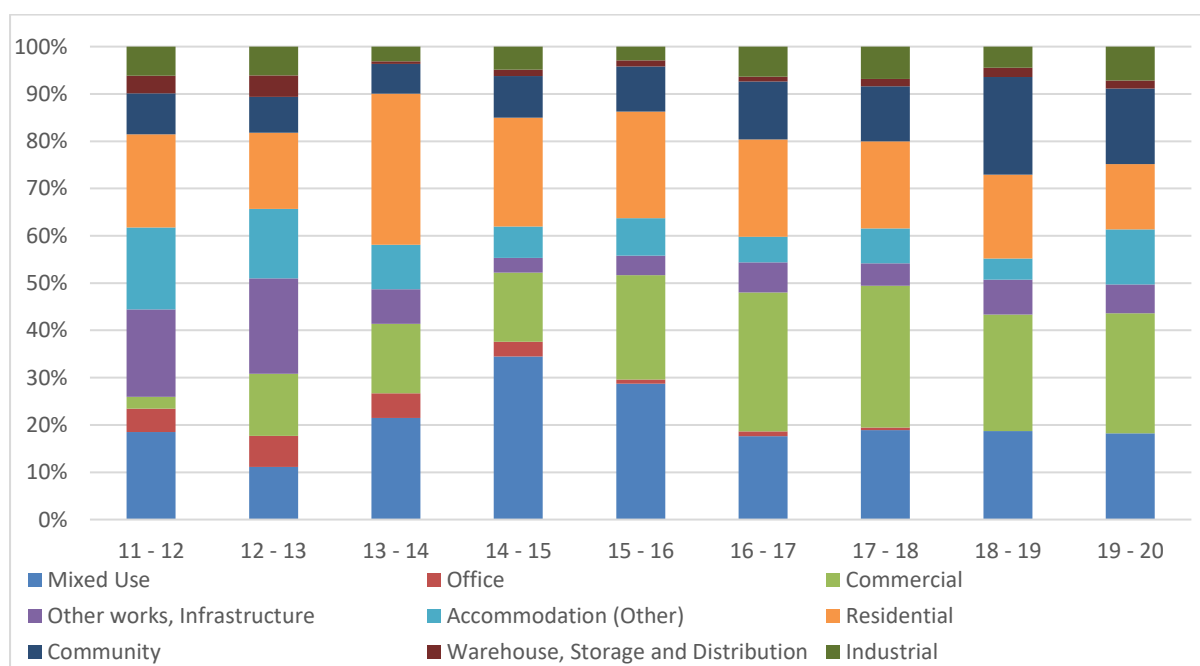
Figure 12: JDAP and Development Use Category 2011-20



The Metro Central JDAP has received the most DAs with 382 application determined over the lifetime of the DAPs system, accounting for 22% of all DAs received. The next most frequent areas for DAPs applications was the Metro North-West JDAPs which accounted for 16.4% of DAs submitted to a JDAP respectively. By Local Government area, over the nine years of operation, the City of Stirling with 110 applications has received the most DAs to be determined by a DAPs, followed by the City of Melville with 87, and the Cities of Perth, Vincent and Swan with 86 each.

Following the amended DAPs application criteria in 2016, there has been a trend of ‘community’ and ‘commercial’ development becoming more common development categories. During 2015/16 mixed use development accounted for 29% of all DAs whilst residential development remained consistently high at 23% of all applications, the largest, but since 2017/18 this proportion has reduced to approximately 18% of all applications. The number of commercial applications increased significantly from 15% in 2014/15 to 25% of all applications in 2019/20. The growth within this category of development has been driven by the lowering of the development application criteria and a large number of development proposals for service stations and fast food restaurants valued between \$2-\$3m.

Figure 13: Proportional Development Use Category, 2011-20

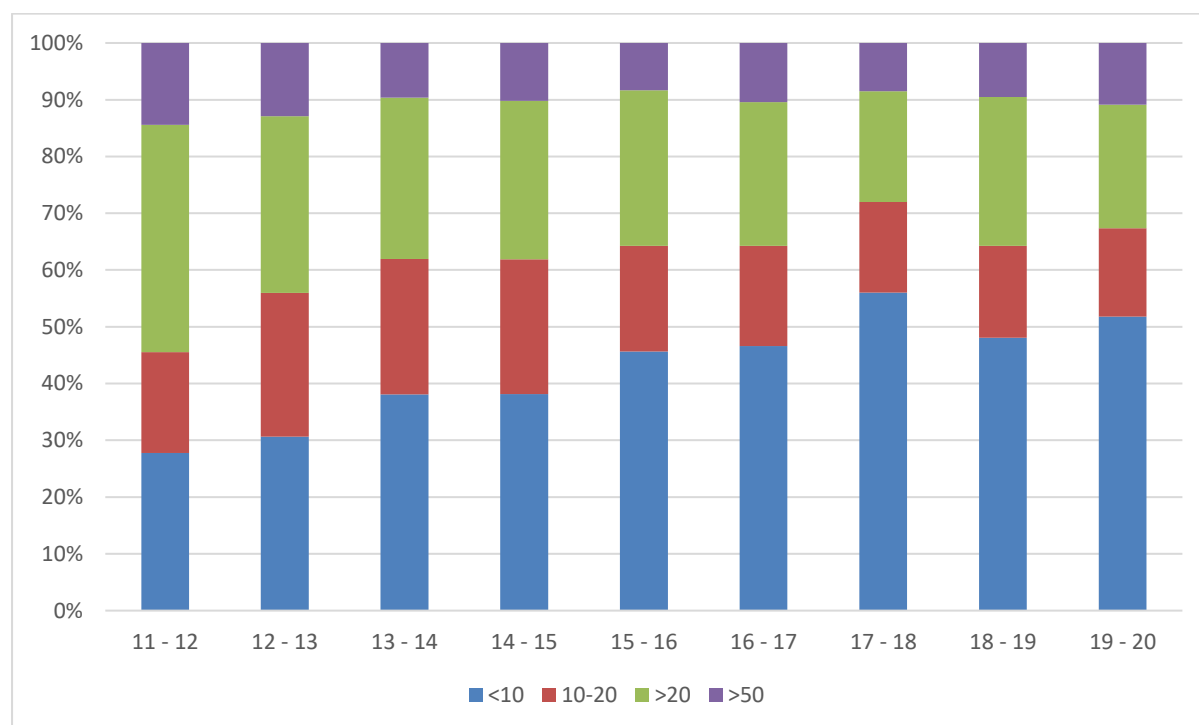


## 4.5 DAP Application Development Costs & Fees

As was identified in the 2015/16 review of the DAPs system, the decision to reduce the entry threshold from \$3m to \$2m saw a range of negative consequences that have reduced the effectiveness of the DAP system to achieve its aims and objectives to focus on assessing significant and more complex proposals. What has been observed since that time is a steady increase in the number and proportion of proposals that falls within the \$2m-\$3m value range. In 2015/16, 10% and 29% of proposals fell within \$2m-\$3m and <\$2m value brackets, respectively, however by 2019/20 this has increased to 26% and 38%, respectively.

As shown in Figure 14 below, the proportion of DA proposals with a designated value of greater than \$20m and \$50m is 23% and 12%, respectively, in 2019-20. While the proportion of matters with a value of greater than \$50 has stayed stagnant across the nine years of data, for those with a value between over \$20m has reduced to less than a quarter of proposals. Reinforcing the trend towards lower project values, those projects between \$10 and \$20m now equate to less than a fifth of proposals, while those with a value of less than \$10m now represent 56% of all applications.

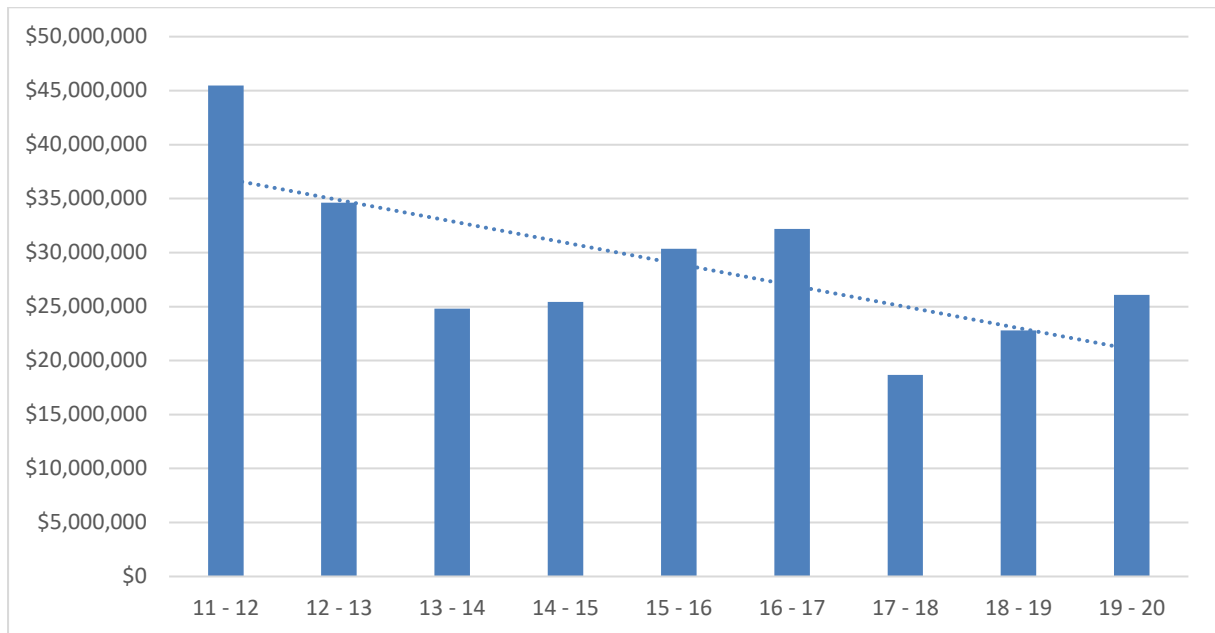
Figure 14: DA Value (proportional), 2011-20



It has been stated a number of times in this report that the reduction in the DAP threshold in 2016 led to a dramatic increase in the number of low value applications being presented to DAPs, and that these applications are often deferred, recommended for refusal or more likely to have longer determination times. When looking at ‘commercial’ proposals we see a dramatic increase in the number of low cost proposals in the years following the lowering of the threshold. For example, in 2017/18 some 91% of all ‘commercial’ proposal had a value of less than \$10m, with 58% of proposals being between \$2-\$3m. By 2019/20, the ‘commercial’ and ‘community’ categories account for 74% of proposals with a value of between \$2-\$3m. These proposals are often ‘service stations’, ‘child care centres’ and ‘fast food restaurants’. It should be noted that ‘service stations’ and ‘child care centres’ account for 29% of all deferred decisions between \$2-\$3m.

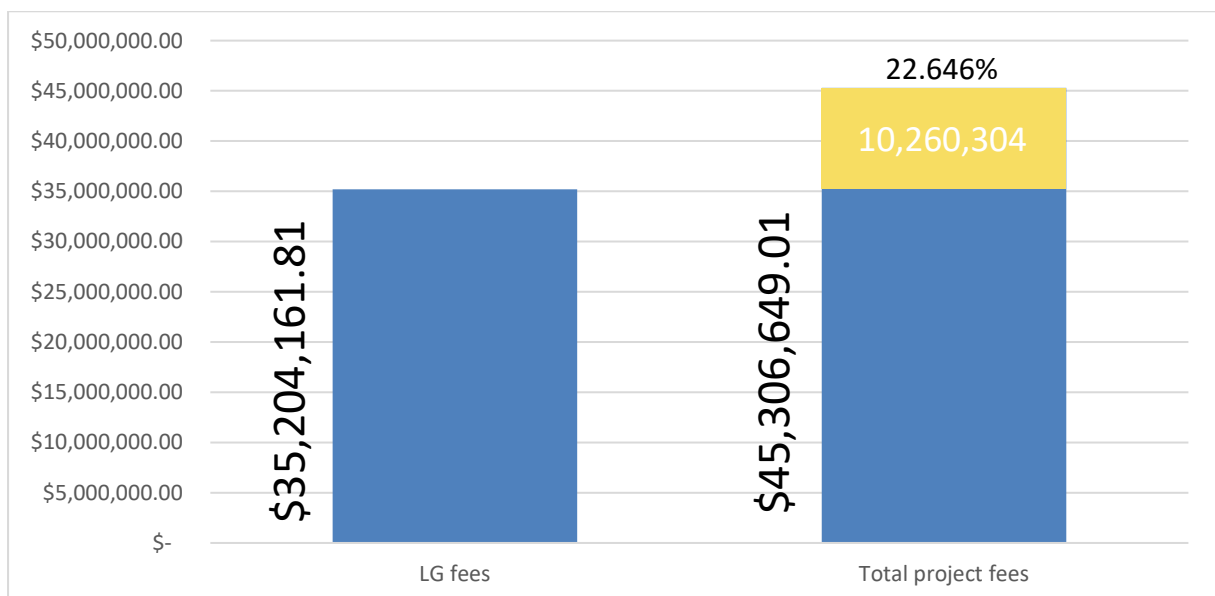
Perhaps unsurprisingly the increase in the number of lower cost proposals has led to a general reduction in the average value of DAs being presented to a DAP. A consistent trend line is observable across the nine years of data.

Figure 15: Average project value



In terms of fees collected by both the DAP secretariat and Local Government for their roles in assessing and determining DAP applications, this report has found some interesting trends. In total Local Governments have collected just over \$35m in fees, with the total fee take \$45.3m to the end of 2019/20. Fees to the DAP secretariat, shown as yellow in Figure 16, account for 22.65% of all fees collected. This is in an increase in from 19.26% in 2015/16.

Figure 16: Total Fees



An increase in this proportion is not unexpected, with the DAP fee schedule being increased a number of times over the nine years, while the fees set for Local Governments have not been adjusted since 2013. Local Governments fee take by year peaked in 2014/15 with just

over \$5m collected, but since that time the annual fee take for Local Government has trended down. However, since 2014/15 the average fee take for the DAP secretariat has increased by 44% at a time when the average value of proposals has remains stagnant.



## Appendix

### Appendix 1

<b>Accommodation (Other)</b>	Aged Care Holiday / Tourist Accommodation Hotel	Serviced Apartments Workers Accommodation
<b>Commercial</b>	Alcohol Licenced Premise (Pub/Bar) Beauty Studios Car Wash Cinema Fast Food Fuel Filling Station	Hired Goods Restaurant Retail Shopping Centres Showroom Vehicle Sales
<b>Community</b>	Airport, Railway, Bus Station Family Day Care Health / Medical Facility Library Places Of Worship	Public Open Space School Sporting Facility Veterinary Hospital
<b>Industrial</b>	Food Production Facility- Abattoir - Mill Light Industrial Mining Operation Power Station0	Recycling Facility Renewable Energy Facility Vehicle Repairs & Dismantling Workshops
<b>Mixed Use</b>	Any development with multiple components that fall into different development categories	
<b>Office</b>	Office Research And Development And Laboratory Facilities	Television Studio
<b>Other Works, Infrastructure</b>	Additions And Alterations Earthworks Infrastructure Works - Substation - Water Corp Facility etc Landfill	Miscellaneous Works Outbuilding Vehicle Parking
<b>Residential</b>	Residential Accommodation	
<b>Warehouse, Storage and Distribution</b>	Distribution Facility Storage	Transport Depot Warehousing