

## Draft – WA Planning Manual – Local Development Plans – Feedback Form

### Overview

The Western Australian Planning Commission (WAPC) is seeking feedback on the draft Local Development Plans chapter of the WA Planning Manual, developed as part of the State Government's planning reform program.

Local Development Plans (LDPs) are used to guide and coordinate development outcomes on specific (e.g. constrained or small) sites. Over time, the way LDPs have been prepared and applied has varied across Western Australia. This draft chapter has been developed to provide clearer, more consistent guidance on how LDPs should be prepared, used and reviewed.

The draft LDP chapter brings together updated guidance on:

- when an LDP may be appropriate
- how LDPs are prepared and assessed
- how long an LDP should apply
- how LDPs can be amended or revoked.

The guidance reflects current planning requirements and proposed updates to the Planning and Development (Local Planning Schemes) Regulations 2015 (LPS Regulations). It intends to support greater consistency, clarity and certainty for local governments, industry and other users of the planning system.

Read more about the Planning and Development Regulations Amendment (Review of Planning Instruments) Regulations 2025 on [wa.gov.au](http://wa.gov.au).

**View the draft WA Planning Manual – Local Development Plans - [here](#)**

### Consultation details

You are invited to make a submission on the draft LDP chapter of the WA Planning Manual by **5 pm, Friday 28 July 2026**.

Late submissions may not be considered.

This Feedback Form has been prepared to guide the preparation of a submission.

Please email a completed form to [planningframeworks@dplh.wa.gov.au](mailto:planningframeworks@dplh.wa.gov.au).

**Submitter's details:**

|                                                                                                                                                                               |                                      |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|--|
| <b>Submitter's name:</b>                                                                                                                                                      | Jonathan Speer                       |  |
| <b>Email address:</b>                                                                                                                                                         | jonathan.speer@architecture.com.au   |  |
| <b>Are you submitting on behalf of an organisation?</b>                                                                                                                       |                                      |  |
| Yes                                                                                                                                                                           |                                      |  |
| <b>Organisation name (if applicable):</b>                                                                                                                                     |                                      |  |
| Australian Institute of Architects, WA Chapter (Institute)                                                                                                                    |                                      |  |
| <b>Which stakeholder group represents you best? Answers will be used to report on the types of stakeholders we heard from. Select one of the options from the list below.</b> |                                      |  |
| Other                                                                                                                                                                         |                                      |  |
| <b>If you selected 'Other' please outline what group best describes your activities?</b>                                                                                      | Peak body / professional association |  |
| <b>Submissions may be published as part of the consultation process. Do you give permission for your name and your organisation's name (if applicable) to be published?</b>   | Yes, please publish my details       |  |

## Draft – WA Planning Manual – Local Development Plans

The draft Local Development Plan (LDP) chapter of the WA Planning Manual has been prepared to provide clear guidance on the preparation, implementation, assessment, review and revocation of LDPs across local governments.

The questions below seek feedback on key aspects of the draft LDP chapter.

### 1. Need for, and purpose of, a Local Development Plan (Sections 2.0 – 2.3)

Section 2.0 outlines the role and purpose of an LDP, including:

- The role of an LDP
- The respective roles of the local government and the WAPC in the process

Please tick the relevant box and provide any additional comments below:

|                                     |                                                                                                        |
|-------------------------------------|--------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/>            | Support the proposed guidance on the role and purpose of an LDP (Sections 2.0 – 2.3)                   |
| <input checked="" type="checkbox"/> | Support the proposed guidance on the role and purpose of an LDP (Sections 2.0 – 2.3) with modification |
| <input type="checkbox"/>            | Do not support the proposed guidance on the role and purpose of an LDP (Sections 2.0 – 2.3)            |

The Australian Institute of Architects supports the proposed guidance that Local Development Plans should be used selectively and where they provide a clear planning purpose. The Institute particularly supports the recognition that LDPs should respond to site-specific circumstances and coordinate improved development outcomes, rather than adding unnecessary complexity to the planning system.

The Institute recommends that this section be strengthened to more clearly recognise the role of LDPs in achieving high-quality built environment outcomes. In addition to guiding built form, access, landscape and site-specific development standards, LDPs should be framed as tools that can support design quality, place outcomes, sustainability and public realm performance.

Suggested wording could include:

*Local Development Plans should support high-quality built environment outcomes by responding to local context, improving public realm quality, supporting climate-responsive design and contributing positively to the character, identity and livability of places.*

These inclusions would help ensure LDPs are not treated only as compliance instruments, but as mechanisms to support better design outcomes where they are genuinely warranted.

### 2. Preparation of a Local Development Plan (Sections 3.1)

Section 3.1 provides guidance on the preparation of an LDP including:

- When it may be appropriate to prepare an LDP
- When it may not be appropriate to prepare an LDP

**Please tick the relevant box and provide any additional comments**

☐

**Support the proposed guidance on the preparation of an LDP (Sections 3.1)**

☒

**Support the proposed guidance on the preparation of an LDP (Sections 3.1) with modification**

☐

**Do not support the proposed guidance on the preparation of an LDP (Sections 3.1)**

The Institute supports the guidance on when an LDP may or may not be appropriate, and the principle that LDPs should not duplicate other planning instruments or be used beyond their intended scope.

The Institute recommends that Section 3.1 includes stronger guidance that an LDP should only be prepared where it can demonstrate a clear design, place or built form benefit that cannot be adequately achieved through another planning instrument or the development application process.

Where an LDP is proposed to guide built form, public realm, access, landscape or precinct outcomes, the proponent should be required to clearly demonstrate the design rationale for the plan. This should include how the LDP responds to context, improves development quality and supports the objectives of the broader planning framework.

The Institute also supports discouraging the use of LDPs as a routine mechanism for broad R-Code variations. Any variation to development standards should be justified by site-specific circumstances, demonstrably improving built environment outcomes.

### **3. Preparation of a Local Development Plan (Sections 3.2 – 3.4)**

Section 3.0 provides guidance on the preparation of a Local Development Plan, including:

- Preliminary engagement with stakeholders
- Manner and Form
- The role of design review

**Please tick the relevant box and provide any additional comments**

☐

**Support the proposed guidance on the preparation of an LDP (Sections 3.2 – 3.4)**

☒

**Support the proposed guidance on the preparation of an LDP (Sections 3.2 – 3.4) with modification**

☐

**Do not support the proposed guidance on the preparation of an LDP (Sections 3.2 – 3.4)**

The Institute strongly supports the inclusion of design review in Section 3.4 and welcomes the recognition that design review may be appropriate where an LDP establishes a bespoke built form or urban design framework for future development. This is particularly relevant for local centres, neighbourhood centres, mixed-use precincts and other complex development settings.

The Institute recommends strengthening this section by more clearly encouraging early, independent and multidisciplinary design review for LDPs that will shape significant built form, public realm or precinct outcomes. Design review should occur early in the preparation of an LDP, before development standards, envelopes, movement networks and public realm requirements become fixed.

The Institute recommends that Section 3.4 be amended to:

- Encourage design review for precinct-scale, mixed-use, centre-based and other complex LDPs.

- Reinforce the role of independent design review panels in improving design quality and supporting decision-making.
- Clarify that design review should focus on urban design, built form, public realm, sustainability and place outcomes.
- Align more explicitly with State Planning Policy 7.0 Design of the Built Environment.
- Encourage design review before formal advertising where an LDP sets long-term built form or public realm expectations.

Suggested wording:

*For Local Development Plans that establish built form, public realm, movement network or precinct design outcomes, early design review should be strongly encouraged. Design review should be undertaken by appropriately qualified, independent and multidisciplinary built environment professionals and should focus on design quality, contextual response, sustainability, public realm performance and place outcomes.*

This would strengthen consideration of design quality in the LDP process without requiring formal design review for every low-complexity residential LDP, consistent with the draft guidance.

The Institute notes the release of the Local Government Design Review User Guide and encourages the LDP chapter to align with that guidance.

#### **4. Application and assessment of a Local Development Plan (Sections 4.0 – 4.5)**

Section 4.0 outlines the statutory assessment process of an LDP, including:

- Application requirements
- Advertising and the referral process
- Local government decision-making
- WAPC decision-making where R-Code variations are proposed
- Publication requirements

**Please tick the relevant box and provide any additional comments below:**

|                                     |                                                                                                                         |
|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/>            | <b>Support the proposed guidance on the application and assessment of an LDP (Sections 4.0 – 4.5)</b>                   |
| <input checked="" type="checkbox"/> | <b>Support the proposed guidance on the application and assessment of an LDP (Sections 4.0 – 4.5) with modification</b> |
| <input type="checkbox"/>            | <b>Do not support the proposed guidance on the application and assessment of an LDP (Sections 4.0 – 4.5)</b>            |

The Institute supports the proposed guidance on application and assessment processes and recommends that assessment requirements place greater emphasis on the design intent and design rationale of an LDP, particularly where the plan proposes built form controls, R-Code modifications, public realm requirements or exemptions from development approval.

Where an LDP is proposed to shape built form outcomes, the assessment process should require sufficient design information to allow decision-makers, referral bodies and the community to understand the likely built environment consequences of the plan.

This could include where relevant:

- A clear statement of design intent.
- Explanation of the site-specific design issue the LDP seeks to address.
- Diagrams, sections or built form testing where the LDP establishes building envelopes, height, setbacks or public realm outcomes.
- Evidence that proposed standards are capable of being implemented and assessed.
- Explanation of how the LDP supports design quality, climate responsiveness and public realm performance.

Variations should only be supported where they demonstrably improve design quality and achieve the design principles of the R-Codes rather than merely facilitating increased yield.

The Institute also recommends that where WAPC approval is required for R-Code modifications, the supporting rationale should address not only planning compliance but also the intended design quality outcome.

## **5. Implementation and use of a Local Development Plan (Sections 5.0 – 5.2)**

Section 5.0 provides guidance on the implementation and use of an LDP, including:

- How an LDP is to be used in decision-making
- The status and weight of a draft LDP under consideration

**Please tick the relevant box and provide any additional comments below:**

|                                     |                                                                                                                     |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/>            | <b>Support the proposed guidance on the implementation and use of an LDP (Sections 5.0 – 5.2)</b>                   |
| <input checked="" type="checkbox"/> | <b>Support the proposed guidance on the implementation and use of an LDP (Sections 5.0 – 5.2) with modification</b> |
| <input type="checkbox"/>            | <b>Do not support the proposed guidance on the implementation and use of an LDP (Sections 5.0 – 5.2)</b>            |

The Institute supports the guidance on the implementation and use of LDPs in decision-making and recommends that Section 5.0 more clearly articulates how design intent should be carried through from LDP preparation into development assessment.

Where an LDP includes objectives, built form standards or public realm provisions, decision-makers should have regard not only to numerical compliance but also to whether a proposal achieves the intended design outcome. This is particularly important where an LDP is used to guide precinct character, active frontages, pedestrian movement, built form transition, interfaces with surrounding areas and landscape quality. LDPs can also play an important role in supporting urban greening, tree canopy retention and climate resilience outcomes at a site and precinct scale.

The Institute recommends that the guidance encourage LDPs to include clear, outcome-focused objectives that assist decision-makers when considering proposals that do not strictly meet a provision but may still achieve the intended design outcome.

This would support greater consistency while allowing appropriate design flexibility and innovation.

#### **6. Duration and review of a Local Development Plan (Section 6.0 – 6.2)**

Section 6 provides guidance on the duration and review of LDP, including:

- A standard 10-year duration
- Circumstances and process for extending the duration

**Please tick the relevant box and provide any additional comments below:**

|                                     |                                                                                                                  |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/>            | <b>Support the proposed guidance on the duration and review of an LDP (Sections 6.0 – 6.2)</b>                   |
| <input checked="" type="checkbox"/> | <b>Support the proposed guidance on the duration and review of an LDP (Sections 6.0 – 6.2) with modification</b> |
| <input type="checkbox"/>            | <b>Do not support the proposed guidance on the duration and review of an LDP (Sections 6.0 – 6.2)</b>            |

The Institute supports the proposed guidance on the duration and review of LDPs, including the need to ensure plans remain fit for purpose over time.

The Institute recommends that review processes include consideration of whether an LDP continues to support contemporary design quality, sustainability and public realm expectations. Over a 10-year period, community expectations, climate considerations, housing needs, design standards and government policy settings may change considerably.

When considering whether to extend the duration of an LDP, local government should consider whether:

- The design objectives remain relevant.
- The LDP remains consistent with current State planning and design policy.
- The built form controls continue to support good design outcomes.
- The plan continues to provide appropriate flexibility for innovation.
- The plan remains responsive to climate, landscape and public realm considerations.

This is particularly important for LDPs applying to centres, mixed-use precincts or other areas where the quality of the built environment has long-term community impacts.

#### **7. Amending and revoking a Local Development Plan (Sections 7.0 – 8.0)**

Sections 7 and 8 provide guidance on the process of amending or revoking an LDP.

**Please tick the relevant box and provide any additional comments below:**

|                                     |                                                                                                             |
|-------------------------------------|-------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/>            | <b>Support the proposed guidance on amending and revoking an LDP (Sections 7.0 – 8.0)</b>                   |
| <input checked="" type="checkbox"/> | <b>Support the proposed guidance on amending and revoking an LDP (Sections 7.0 – 8.0) with modification</b> |
| <input type="checkbox"/>            | <b>Do not support the proposed guidance on amending and revoking an LDP (Sections 7.0 – 8.0)</b>            |

The Institute supports the proposed guidance on amending and revoking LDPs.

The Institute recommends that amendments to LDPs be assessed not only for administrative or statutory consistency, but also for their impact on design quality and place outcomes. Amendments that materially alter built form, public realm, movement networks, landscape outcomes or design objectives should not be treated as minor unless their design impact is clearly demonstrated to be negligible.

Where an amendment affects the design intent of an LDP, local government should consider whether further design review or targeted design advice is appropriate. This would ensure that amendments do not incrementally weaken the quality or coherence of the original built environment outcome.

Similarly, where an LDP is proposed to be revoked, local government should consider whether any important design quality, public realm or place objectives need to be retained through another planning instrument.

## **8. Appendices**

The Appendices section of the Manual provides Manner and Form templates for the following LDP:

- Appendix 1 – Local Development Plan Manner and Form
- Appendix 1A – Modifications to the Residential Design Codes
- Appendix 1B – Exemptions from development approval

Please provide any comments on the Appendices below (reference the specific appendix where relevant).

**Please tick the relevant box and provide any additional comments below:**

|                                     |                                                                       |
|-------------------------------------|-----------------------------------------------------------------------|
| <input type="checkbox"/>            | <b>Support the proposed appendices 1, 1A and 1B</b>                   |
| <input checked="" type="checkbox"/> | <b>Support the proposed appendices 1, 1A and 1B with modification</b> |
| <input type="checkbox"/>            | <b>Do not support the proposed appendices 1, 1A and 1B</b>            |

The Institute supports the inclusion of standardised templates and manner and form requirements, as these can improve clarity, consistency and legibility across local governments.

The Institute recommends that Appendix 1 be strengthened to require a clearer design intent statement where an LDP establishes built form, public realm or precinct outcomes. This would assist decision-makers, applicants and the community to understand the purpose and intended outcomes of the plan.

The Institute recommends that Appendix 1 includes prompts for:

- Design intent.
- Contextual response.
- Public realm outcomes.

- Climate-responsive design.
- Movement and pedestrian experience.
- Landscape and urban tree canopy considerations.
- Relationship to State Planning Policy 7.0 Design of the Built Environment.
- Any design review undertaken, and how recommendations have been addressed.

For Appendix 1A, the Institute supports requiring clear identification of proposed R-Code modifications and recommends that the template also requires a short explanation of the design quality outcome sought by each modification. This would help ensure variations are justified through articulating a positive planning and design purpose.

#### **9. Other comments on the draft Local Development Plan chapter**

The Institute broadly supports the Local Development Plan chapter and its objective of improving consistency, clarity and certainty across the planning system. The Institute encourages stronger recognition that LDPs should be design-led instruments, supported by design review where appropriate, and assessed against built environment outcomes rather than solely compliance measures.

LDPs can have a significant influence on built form, public realm, movement networks and precinct character. For this reason, the Institute recommends that the chapter more clearly position LDPs as tools for achieving high-quality built environment outcomes, not only as instruments for coordinating development standards.

The Institute supports the chapter's recognition of design review and recommends that the final guidance align closely with State Planning Policy 7.0 Design of the Built Environment and the Local Government Design Review User Guide.

The Institute considers that well-designed LDPs can support housing delivery by providing greater certainty for proponents while also ensuring that increased density contributes positively to neighbourhood character, amenity and public realm outcomes.

These refinements would help ensure LDPs are used selectively and effectively, while supporting better design, stronger place outcomes and more livable Western Australian communities.