

**Subject:** FW: Dr Brian Gordon re: Community Development and Justice Standing Committee

> Hi Brian,

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> You requested feedback regarding council planning regulations and procedures in regards to social and affordable housing, and I am happy to oblige with the following points:

> 1. There are many council regulations which are in my belief valid from the perspective of everyone as a whole. This includes in my opinion regulations on energy efficiency (although mainly pushed by the BCA at this stage). However, these are often contradicted by other planning policies within the same council regulations such as 'houses must have major openings facing the street' which is contrary in some cases to good energy efficient design if the street faces East or West. Other examples of this include planning policies restricting the slope of roofs to certain angles (often contrary to optimum solar PV angles) and restricting materials allowed in the construction of the residence to ones which are often not appropriate to the climate (heavy masonry should be used in areas of high di-urnal range only for instance, lightweight structures should be used in tropical areas and other areas should have reverse brick veneers).

> 2. Councils are starting to implement minimum requirements for both planning and building submissions which increase the cost and time of preparing plans and paperwork in general. Items such as requesting onerous detail are also on the rise (such as requesting spot height levels of no further than 500mm apart) from licenced surveyors. Also, they are starting to require information such as 'wind loading' and 'soil classification data' from a licenced structural engineer who consider it an 'affront' to be required to submit this information (one such engineer stated, "after giving this information what is he going to do with it? Nothing, tick the box"). They are also requesting 'Construction Management Plans'. Less red tape would ensure quick approvals and build times.

> 3. No council has established any online submission system yet. The quantities of paper involved in submitting even the most basic planning or building approval usually results in large packages of 5 to 6 copies of plans and specifications, lengthy checklists and reports, and forms. Online submissions will reduce paper and compilation costs dramatically.

> 4. With the intention of implementing the R-Codes, councils sometimes work up an issue beyond proportion. An example is when a planning approval for a Granny Flat is submitted. Some councils (not all) require us to get the owner to alter his/her certificate of title to implement a condition that the 'granny flat will always be occupied by a member of the same family'. Besides being unenforceable, this alteration to the certificate of title is very difficult to achieve, requires numerous forms and submissions between Landgate, WAPC and Councils, and hinders timing and development, and costs more money to do.

> 5. Councils are also in the habit of cancelling a submitted application after 60 days inside council. At this point, they urge us to resubmit the application (with all the paperwork, and owners signatures, that this entails) to restart the 60 day period. This has occurred on 3 projects this year and after lengthy arguments with the officers (usually citing council delays as the cause) they generally acquiesce by ignoring this requirement.

> 6. Councils are now requiring building licence application forms to have a builders signature before they accept the package. This has far reaching ramifications, meaning that the owner's or anyone other than a builder can't submit documentation and detailing to the council. In the past, the builder would collect the building licence once the assessment is completed, needing no bearing on the documentation and engineering production.

> 7. Tenders called by government departments are increasingly difficult to pitch for. The problem is that they give limited brief information in order for them to limit the risk of a higher quote average - however too little information also makes for wild

