



THIRTY-EIGHTH PARLIAMENT

REPORT 55

**JOINT STANDING COMMITTEE ON DELEGATED
LEGISLATION**

***CITY OF PERTH STANDING ORDERS AMENDMENT
LOCAL LAW 2012***

REPORT

Presented by Mr Paul Miles MLA (Chairman)

and

Hon Sally Talbot MLC (Deputy Chair)

September 2012

JOINT STANDING COMMITTEE ON DELEGATED LEGISLATION

Date first appointed

28 June 2001

Terms of Reference

The following is an extract from Schedule 1 of the Legislative Council Standing Orders:

3. Joint Standing Committee on Delegated Legislation

- 3.1 A *Joint Standing Committee on Delegated Legislation* is established.
- 3.2 The Committee consists of 8 Members, 4 of whom are appointed from each House. The Chairman must be a Member of the Committee who supports the Government.
- 3.3 A quorum is 4 Members of whom at least one is a Member of the Council and one a Member of the Assembly.
- 3.4 A report of the Committee is to be presented to each House by a Member of each House appointed for the purpose by the Committee.
- 3.5 Upon its publication, whether under section 41(1)(a) of the *Interpretation Act 1984* or another written law, an instrument stands referred to the Committee for consideration.
- 3.6 In its consideration of an instrument, the Committee is to inquire whether the instrument -
- (a) is authorized or contemplated by the empowering enactment;
 - (b) has an adverse effect on existing rights, interests, or legitimate expectations beyond giving effect to a purpose authorized or contemplated by the empowering enactment;
 - (c) ousts or modifies the rules of fairness;
 - (d) deprives a person aggrieved by a decision of the ability to obtain review of the merits of that decision or seek judicial review;
 - (e) imposes terms and conditions regulating any review that would be likely to cause the review to be illusory or impracticable; or
 - (f) contains provisions that, for any reason, would be more appropriately contained in an Act.
- 3.7 In this clause -
- “**adverse effect**” includes abrogation, deprivation, extinguishment, diminution, and a compulsory acquisition, transfer, or assignment;
- “**instrument**” means -
- (a) subsidiary legislation in the form in which, and with the content it has, when it is published;
 - (b) an instrument, not being subsidiary legislation, that is made subject to disallowance by either House under a written law;
- “**subsidiary legislation**” has the meaning given to it by section 5 of the *Interpretation Act 1984*.

Members as at the time of this inquiry

Mr Joe Francis MLA (Chairman) (until 14/08/12)	Mr Andrew Waddell MLA
Mr Paul Miles MLA (Chairman) (from 20/08/12)	Ms Janine Freeman MLA
Mr Vincent Catania MLA (from 16/08/12)	Hon Helen Bullock MLC
Hon Sally Talbot MLC (Deputy Chair)	Hon Jim Chown MLC
Hon Alyssa Hayden MLC	

Staff as at the time of this inquiry

Suzanne Veletta (Advisory Officer)	Anne Turner (Advisory Officer (Legal))
Felicity Mackie (Advisory Officer (Legal))	Talweez Senghera (Committee Clerk)

Address

Parliament House, Perth WA 6000, Telephone (08) 9222 7222

lcco@parliament.wa.gov.au

Website: <http://www.parliament.wa.gov.au>

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EXECUTIVE SUMMARY AND RECOMMENDATION FOR THE
REPORT OF THE JOINT STANDING COMMITTEE ON DELEGATED LEGISLATION
IN RELATION TO THE *CITY OF PERTH STANDING ORDERS AMENDMENT LOCAL LAW 2012*
REPORT

EXECUTIVE SUMMARY

- 1 Section 3.12(1) of the *Local Government Act 1995* (**Act**) states that in making a local law a local government is to follow the procedure in section 3.12, in the sequence in which it is described.
- 2 The Joint Standing Committee on Delegated Legislation (**Committee**) has identified that the City of Perth did not follow the correct procedure described in the Act when it made its *City of Perth Standing Orders Amendment Local Law 2012* (**Amendment Local Law**).
- 3 The City of Perth failed to follow the sequential steps outlined in section 3.12(3)(b) of the Act, which has resulted in the Amendment Local Law being invalid. The Local Law is not authorised by the Act and therefore offends the Committee's *Term of Reference* 3.6(a).
- 4 On 18 July 2012, the Minister for Local Government stated that he agreed with the Committee's position that local laws should be disallowed where local governments have failed to comply with the local law making process.¹
- 5 The Committee recommends the House disallow the Amendment Local Law.
- 6 The Committee noted that on 22 June 2012, the Director General of the Department of Local Government advised all local governments by *Circular* of the Committee's strict approach to compliance with section 3.12 of the Act.² The Director General further advised local governments that following disallowance of the:
 - *Shire of Kellerberrin Parking and Parking Facilities Local Laws 2011*,³ and

¹ Letter from Hon John Castrilli MLA, Minister for Local Government, 18 July 2012, p1.

² Ms Jennifer Mathews, Director General, Department of Local Government, *Circular to All Local Governments*, Circular Number 16-2012.

³ Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 47, Shire of Kellerberrin Parking and Parking Facilities Local Laws 2011*, 3 May 2012.

- *Town of Kwinana Extractive Industries Local Law 2011*,⁴

the *Statutory Procedures Checklist* has been updated to “remove any ambiguity as to the order in which the law making process must occur”.⁵ The Committee welcomes this assistance to local governments.

RECOMMENDATION

7 The Recommendation is as it appears in the text at the page number indicated:

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Recommendation 1: The Committee recommends that the *City of Perth Standing Orders Amendment Local Law 2102* be disallowed.

⁴ Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 48, Town of Kwinana Extractive Industries Local Law 2011*, 3 May 2012.

⁵ Ms Jennifer Mathews, Director General, Department of Local Government, *Circular to All Local Governments*, Circular Number 16-2012.

REPORT OF THE JOINT STANDING COMMITTEE ON DELEGATED LEGISLATION

IN RELATION TO THE *CITY OF PERTH STANDING ORDERS AMENDMENT LOCAL LAW 2012*

REPORT

1 REFERRAL TO THE COMMITTEE

- 1.1 The *City of Perth Standing Orders Amendment Local Law 2012* (**Amendment Local Law**) falls within the definition of ‘Instrument’ in the *Terms of Reference* of the Joint Standing Committee on Delegated Legislation (**Committee**).
- 1.2 The Amendment Local Law stands referred to the Committee upon publication in the *Western Australian Government Gazette*. Its full text is publicly available from the State Law Publisher’s website at <http://www.slp.wa.gov.au/gazette/gazette.nsf>.⁶

2 BACKGROUND

- 2.1 The City of Perth (**City**) resolved to commence the process of making an amendment to its principal, Standing Orders Local Law 2009 at its meeting on 31 January 2012.
- 2.2 The procedure for making a local law is outlined in section 3.12 of the *Local Government Act 1995* (**Act**) and is replicated at **Appendix 1**.

3 SCRUTINY OF THE PROCEDURE FOR MAKING THE AMENDMENT LOCAL LAW

- 3.1 The Committee first scrutinised the Amendment Local Law on 25 June 2012. The City provided a *Statutory Procedures Checklist* for the Instrument which indicated non-compliance with section 3.12(3)(b) of the Act. That sub-section requires that:

The local government is to –

... as soon as the [Statewide public] notice is given, give a copy of the proposed local law and a copy of the notice to the Minister and, if another Minister administers the Act under which the local law is proposed to be made, to that other Minister.

- 3.2 According to sections 1.7 and 1.8 of the Act, ‘Statewide public notice’ requires a notice to be published in a newspaper circulating generally throughout the State, exhibition of the notice to the public on a notice board at the local government’s offices and to the public at every local government library in the district. All three

⁶ The Amendment Local Law was published in the *Western Australian Government Gazette* on 29 May 2012, No.82.

elements of Statewide public notice must be completed in order for the notice to be effective.

- 3.3 The *Statutory Procedures Checklist* for the City's Local Law indicated that Statewide public notice was published in *The West Australian* on 15 February 2012 with the Minister given a copy of the proposed Instrument and a copy of the Statewide public notice on 8 February 2012.
- 3.4 The Committee sought confirmation of the accuracy of the information in the *Statutory Procedures Checklist*. On 11 July 2012, the City confirmed that the checklist was correct; that is, the City sent copies of the Statewide public notice and the proposed local law to the Minister before giving Statewide public notice. However, the Act requires that the City should have proceeded in the reverse manner; that is, Statewide public notice should have been given first (pursuant to 3.12(3)(a)) and then the Minister given a copy of the Statewide public notice and the proposed local law, pursuant to 3.12(3)(b).
- 3.5 As a result of this error, the procedure in section 3.12(3) of the Act for the Amendment Local Law has not been sequentially followed. This procedural defect has resulted in the Committee forming a view that the Amendment Local Law is unauthorised by the Act because the wording of section 3.12(3)(b) expressly uses the words "*as soon as the [Statewide public] notice is given*", which requires notification be given to the Minister only after the Statewide public notices have been given.
- 3.6 A copy of the City's response to the Committee's letter regarding the Amendment Local Law is replicated at **Appendix 2**.

4 NON-COMPLIANCE WITH SECTION 3.12 OF THE LOCAL GOVERNMENT ACT 1995

Disallowance of an invalid local law - the Committee's position

- 4.1 The Committee has previously stated its position on the status of invalid local laws and the prospect of disallowance on seven other occasions in its:
- 42nd report: *Town of Capel Keeping and Welfare of Cats Amendment Local Law 2009* and *Town of Koorda Standing Orders Local Law 2009*;⁷
 - 45th Report: *Shire of Kellerberrin Dogs Local Law*;⁸

⁷ Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 42, Shire of Capel Keeping and Welfare of Cats Amendment Local Law 2009* and *Shire of Koorda Standing Orders Local Law 2009*, 16 September 2010. These two local laws raised the same issue for the Committee in that both Instruments were gazetted in error. In each case, the Instrument gazetted was not the one adopted by the Shire Council or subject to the procedure set out under section 3.12 of the *Local Government Act 1995*.

- 47th Report: *Shire of Kellerberrin Parking and Parking Facilities Local Laws 2011*;⁹
- 48th Report: *Town of Kwinana Extractive Industries Local Law 2011*;¹⁰
- 51st Report: *Town of Bassendean Repeal Local Law 2010 and Town of Bassendean Dust and Sand Local Law 2011*;¹¹
- 53rd Report: *Mindarie Regional Council Standing Orders Amendment Local Law 2012*¹²; and
- 54th Report: *City of Bayswater Standing Orders Local Law 2012*.¹³

4.2 The Amendment Local Law raises the same issues in relation to the effect of not complying with the procedure in section 3.12 of the Act and the Committee notes that a failure to comply with the requirements of the section will result in a local law being found to be invalid.

4.3 As stated previously, an Instrument stands referred to the Committee at the time of gazettal. Upon the tabling of a local law, there is an Instrument which may be subject

⁸ Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 45, Shire of Kellerberrin Dogs Local Law*, 3 November 2011. The Committee formed the view that the local law had been invalidly made, based on non-compliance with sections 3.12(5) and (6) of the *Local Government Act 1995*. The Committee recommended that the Executive Council advise the Governor to invoke section 3.17 of the *Local Government Act 1995* to repeal the local law. This course of action was chosen because due to an administrative error, a notice of motion to disallow was not moved in the Legislative Council on the last date for disallowance: 27 September 2011.

⁹ Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 47, Shire of Kellerberrin Parking and Parking Facilities Local Laws 2011*, 3 May 2012. This Instrument offended section 3.12(5) of the *Local Government Act 1995*, that is, the sequence is that after making the local law, it has to be published in the *Gazette* and a then a copy is to be given to the Minister. The Instrument was gazetted on 14 October 2011 but was sent to the Minister 11 days prior to gazettal.

¹⁰ Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 48, Town of Kwinana Extractive Industries Local Law 2011*, 3 May 2012. This Instrument offended section 3.12(3)(b) of the *Local Government Act 1995*, in that a copy of the proposed local law was given to the Minister six days before Statewide public notice was given.

¹¹ Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 51, Town of Bassendean Repeal Local Law 2010 and Town of Bassendean Dust and Sand Local Law 2011*, 16 August 2012. This Instrument offended section 3.12(3)(b) of the *Local Government Act 1995*, in that a copy of the proposed local law was given to the Minister one day before Statewide public notice was given.

¹² Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 52, Mindarie Regional Council Standing Orders Amendment Local Law 2012*, 13 September 2012. This Instrument offended section 3.12(3)(b) of the *Local Government Act 1995*, in that the Minister was never given a copy of the Statewide public notice.

¹³ Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 53, City of Bayswater Standing Orders Local Law 2012*, 13 September 2012. The City of Bayswater sent copies of the Statewide public notice and the proposed local law to the Minister eight days before giving Statewide public notice contrary to 3.12(3)(b) of the Act.

to disallowance and the Parliament has the power to disallow a local law tabled before it.¹⁴

- 4.1 In the Committee's view, tabled instruments that have not been correctly made by following the prescribed statutory method are not excluded from that power to disallow.

5 STATUTORY PROCEDURE FOR MAKING A LOCAL LAW

- 5.1 It is important to note that section 3.12(1) of the Act is as follows:

3.12 Procedure for making local laws

In making a local law a local government is to follow the procedure described in this section, in the sequence in which it is described.

[Committee emphasis]

- 5.2 If the steps set out in section 3.12 are not followed exactly in the order in which they are outlined, then the requirements of the Act have not been met and the local law is consequentially invalid.
- 5.3 Long-standing advice from the then Crown Solicitor's Office (now State Solicitor's Office) in January 2002 is that the procedure in section 3.12 is mandatory. A local law which does not follow the process in the order in which it is described there will be invalid.¹⁵
- 5.4 Therefore, as the process outlined in section 3.12(3)(b) of the Act has not been followed correctly, the Committee has formed the view that the Amendment Local Law is invalid and capable of disallowance.

6 REVIEW OF SECTION 3.12 OF THE LOCAL GOVERNMENT ACT 1995

- 6.1 The Committee notes that this is the eighth occasion since September 2010 that the Committee has scrutinised a local law which has not correctly followed the mandatory sequential procedure prescribed in section 3.12(2) of the Act.
- 6.2 The Committee is concerned that the overly prescriptive nature of section 3.12(2) may be the cause of local laws being invalid. Prior to the publication of *Circular Number 16-2012* on 22 June 2012, local governments were clearly unaware of the legal consequences of not complying exactly with all of the steps in section 3.12(2) in the order in which they are prescribed.

¹⁴ Section 42 of the *Interpretation Act 1984*.

¹⁵ That longstanding advice dated 31 January 2002 is replicated in Appendix 4 to Report 42, Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 42, Shire of Capel Keeping and Welfare of Cats Amendment Local Law 2009 and Shire of Koorda Standing Orders Local Law 2009*, 16 September 2010.

- 6.3 Sequential errors result in significant resources and rate payer money being expended by local governments to make laws which are ultimately found to be invalid and of no legal effect. While the Committee is sympathetic to the intention of local governments when they fail to comply with the process in section 3.12(2), the Committee's *Terms of Reference* oblige it to investigate when an Instrument of subsidiary legislation is not made according to the requirements of its empowering statute.
- 6.4 The Committee sees a solution to this discord between a strict legal interpretation of the words of section 3.12(2) and the practical impact on the many local governments in the State which may not be aware of the effect of non-compliance with section 3.12(2) of the Act.
- 6.5 On 18 July 2012, the Minister for Local Government advised that following disallowance of the *Town of Kwinana Extractive Industries Local Law 2011*¹⁶ and the *Shire of Kellerberrin Parking and Parking Facilities Local Laws 2011*¹⁷, he will review section 3.12 of the Act "in the future and the possibility of further amendment will be considered."¹⁸
- 6.6 On 22 June 2012, the Director General of the Department of Local Government advised all local governments by *Circular* of the Committee's strict approach to compliance with section 3.12.¹⁹ The Director General further advised that following disallowance of the:
- *Shire of Kellerberrin Parking and Parking Facilities Local Laws 2011*,²⁰ and
 - *Town of Kwinana Extractive Industries Local Law 2011*,²¹

¹⁶ Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 48, Town of Kwinana Extractive Industries Local Law 2011*, 3 May 2012.

¹⁷ Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 47, Shire of Kellerberrin Parking and Parking Facilities Local Laws 2011*, 3 May 2012. This Instrument offended section 3.12(5) of the *Local Government Act 1995*, that is, the sequence is that after making the local law, it has to be published in the *Gazette* and a then a copy is to be given to the Minister. The Instrument was gazetted on 14 October 2011 but was sent to the Minister 11 days prior to gazettal.

¹⁸ Letter from Hon John Castrilli MLA, Minister for Local Government, 18 July 2012, p1.

¹⁹ Ms Jennifer Mathews, Director General, Department of Local Government, *Circular to All Local Governments*, Circular Number 16-2012.

²⁰ Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 47, Shire of Kellerberrin Parking and Parking Facilities Local Laws 2011*, 3 May 2012. This Instrument offended section 3.12(5) of the *Local Government Act 1995*, that is, the sequence is that after making the local law, it has to be published in the *Gazette* and a then a copy is to be given to the Minister. The Instrument was gazetted on 14 October 2011 but was sent to the Minister 11 days prior to gazettal.

²¹ Western Australia, Legislative Council, Joint Standing Committee on Delegated Legislation, *Report 48, Town of Kwinana Extractive Industries Local Law 2011*, 3 May 2012. This Instrument offended section 3.12(3)(b) of the *Local Government Act 1995*, in that a copy of the proposed local law was given to the Minister six days before Statewide public notice was given.

the *Statutory Procedures Checklist* has been updated to “*remove any ambiguity as to the order in which the law making process must occur*”.²² The Committee welcomes this assistance to local governments.

7 CONCLUSIONS

Term of Reference 3.6(a)

7.1 The Committee has concluded that the Amendment Local Law offends its *Term of Reference* 3.6(a) on the basis of non-compliance with a mandatory requirement in section 3.12(3)(b) of the Act. The Committee has therefore resolved to recommend that the House disallow the Amendment Local Law as it is of the view that it is invalid and not authorised by the Act.

7.2 The Committee has also concluded that there is an avenue for ensuring that this type of non-compliance (or more appropriately termed, ‘substantial compliance’) should not be a barrier to local laws being authorised under the Act.

Consequences of disallowance

7.3 As outlined in previous reports, the Committee notes that a number of benefits exist in recommending the disallowance of invalid instruments, which include ensuring that invalid laws are quickly removed from the public record and reducing the risk of public misinformation.

7.4 Disallowance of the Amendment Local Law will revive the *City of Perth Standing Orders Local Law 2009* published in the *Gazette* on 13 October 2009.

7.5 The Amendment Local Law was not made as a result of any prior undertakings given to the Committee. Rather, it was:

*created as a result of the City’s review of reports by the Joint Standing Committee in relation to concerns raised by the Committee in respect of other Standing Orders local laws that it had reviewed.*²³

7.6 The City stated it will not recommence the process of making another Standing Orders amendment local law until 2017 - the time of the next statutory review.

²² Ms Jennifer Mathews, Director General, Department of Local Government, *Circular to All Local Governments*, Circular Number 16-2012.

²³ Letter from Mr Frank Edwards, Chief Executive Officer, City of Perth, 11 July 2012, p1.

RECOMMENDATION

Recommendation 1: The Committee recommends that the *City of Perth Standing Orders Amendment Local Law 2102* be disallowed.



**Mr Paul Miles MLA
Chairman**

13 September 2012

APPENDIX 1

SECTION 3.12 OF THE *LOCAL GOVERNMENT ACT 1995*

3.12. Procedure for making local laws

(1) In making a local law a local government is to follow the procedure described in this section, in the sequence in which it is described.

(2) At a council meeting the person presiding is to give notice to the meeting of the purpose and effect of the proposed local law in the prescribed manner.

(3) The local government is to —

(a) give Statewide public notice stating that —

(i) the local government proposes to make a local law the purpose and effect of which is summarized in the notice;

(ii) a copy of the proposed local law may be inspected or obtained at any place specified in the notice; and

(iii) submissions about the proposed local law may be made to the local government before a day to be specified in the notice, being a day that is not less than 6 weeks after the notice is given;

(b) as soon as the notice is given, give a copy of the proposed local law and a copy of the notice to the Minister and, if another Minister administers the Act under which the local law is proposed to be made, to that other Minister; and

(c) provide a copy of the proposed local law, in accordance with the notice, to any person requesting it.

(3a) A notice under subsection (3) is also to be published and exhibited as if it were a local public notice.

(4) After the last day for submissions, the local government is to consider any submissions made and may make the local law as*

proposed or make a local law that is not significantly different from what was proposed.*

** Absolute majority required.*

(5) After making the local law, the local government is to publish it in the Gazette and give a copy of it to the Minister and, if another Minister administers the Act under which the local law is proposed to be made, to that other Minister.

(6) After the local law has been published in the Gazette the local government is to give local public notice —

(a) stating the title of the local law;

(b) summarizing the purpose and effect of the local law (specifying the day on which it comes into operation); and

(c) advising that copies of the local law may be inspected or obtained from the local government's office.

(7) The Minister may give directions to local governments requiring them to provide to the Parliament copies of local laws they have made and any explanatory or other material relating to them.

(8) In this section —

making in relation to a local law, includes making a local law to amend the text of, or repeal, a local law.

APPENDIX 2

RESPONSE FROM THE CITY OF PERTH

Enquiries to: Grant Bradbrook
Corporate Support (9461 3268)
Email: grant.bradbrook@cityofperth.wa.gov.au
Your Ref: 3891/1

6 July 2012

The Hon Sally Talbot MLC
Deputy Chair
Joint Standing Committee on Delegated Legislation
Parliament House
Perth WA 6000



Dear Ms Talbot

City of Perth Standing Orders Amendment Local Law 2012

Thank you for your letter dated 26 June 2012 in relation to the City of Perth Standing Orders Amendment Local Law 2012 (local law). I wish to confirm that the Statutory Procedures Checklist as provided to the Joint Standing Committee on Delegated Legislation is correct and acknowledge the procedural non-compliance that has occurred in relation to making the local law.

The procedural non-compliance has arisen as a result of an administrative error and the City accepts that this issue, although very minor, likely renders the local law invalid. Whilst this may be the case, it should be noted that the City of Perth Standing Orders Local Law 2012 was created as a result of the City's review of reports by the Joint Standing Committee in relation to concerns raised by the Committee in respect of other Standing Orders local laws that it had reviewed.

The consequence of disallowance of the City of Perth Standing Orders Local Law 2012 will be that the City's existing Standing Orders Local Law 2009 will remain in operation unamended.

Notwithstanding that the procedural non-compliance is a result of an administrative error by the City, due to the time and expense involved in recommencing the process to make the City of Perth Standing Orders Local Law 2012, the City will not proceed with this process and its existing Standing Orders Local Law 2009 will remain in operation until the local law is due for statutory review in 2017.

The City's existing Standing Orders Local Law 2009 contains clauses that the Committee has found objectionable or invalid in other Standing Orders local laws and it would seem to be a less than optimal outcome for the City and the Joint Standing Committee for these clauses to remain operational, particularly given the triviality of the City's procedural non-compliance. However, the City does accept that in law, the Joint Standing Committee may have no alternative but to recommend that the local law be disallowed.

*Council House
27 St George's Terrace, Perth.
GPO Box C120, Perth, Western Australia 6839.
Telephone (08) 9461 3333 - Facsimile (08) 9461 3083
Web Site Address - <http://www.perth.wa.gov.au>
ABN 83 780 118 628
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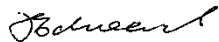
Given the ongoing issues that arise in relation to the local law making procedure across the local government sector, the City is of the view that the appropriateness of the local law provisions of the Local Government Act 1995 requires review. It is the City's view that it would be far more efficient and effective for regulation currently promulgated by local governments through local laws in relation to issues that exist across all local governments such as Standing Orders, dogs, local government property, activities on thoroughfares and the like, to be prescribed in Regulations in much the same way as occurs in some other States.

The City believes that such an approach warrants consideration as it would provide greater consistency in the regulatory environment for business and the community, and remove the time consuming and costly process currently involved in making local laws.

Whilst this issue is one that ought to most appropriately be addressed with the Department of Local Government and the Western Australian Local Government Association, I consider that it is also worth drawing to the attention of the Joint Standing Committee on Delegated Legislation.

Should you have any queries regarding this correspondence please contact the City's Manager Corporate Support, Grant Bradbrook, on 9461 3268.

Yours sincerely



FRANK EDWARDS
CHIEF EXECUTIVE OFFICER