

8 August 2018



Australian Institute of Architects

Mr Evan Jones
Principal
WA Planning System Review
Department of Planning
Locked Bag 2506
PERTH WA 6001

Dear Mr Jones

MODERNISING WESTERN AUSTRALIA'S PLANNING SYSTEM

The Australian Institute of Architects (Institute) is the peak body for the architecture profession in Australia, working to improve our built environment by promoting quality, responsible, sustainable design. The Institute also aims to enhance the cultural, environmental and economic well-being of the community by advancing contemporary practice and the professional capability of architects and advocating the value of architecture.

We take this opportunity to comment on the State Government's Green Paper, Modernising Western Australia's Planning System, and would like to thank Su Groome from the Planning Reform Team for attending a forum at the Institute's premises on Monday 30 July, to explain to our members the detail of this Independent Review and the government's next steps.

Generally, the Institute is extremely supportive of the basic tenant of the Green Paper – the need for our state planning regime to be refocused and prioritised towards a more strategic planning model.

However, we would like to outline our concerns in detail, and put forward a series of recommendations that we would like to see incorporated into the state's future planning and design policy framework.

Our members agree that this is an extremely important and complex issue, and many of them have provided considerable feedback in response to the Green Paper, which I've summarised and outlined in detail below. (For the sake of brevity, we have included a summary of the Institute's 12 recommendations at the end of this document.)

The Reform Context

We recognise that the greater Perth region is in the throes of a major transformation from a predominantly suburban low-density typology towards a denser, more public transport orientated development pattern that relies heavily on urban infill and built form solutions to housing. In the face of this transition, the current statutory planning system is struggling to keep up with the pace of change.

These changes are the inevitable consequence of a growing and ageing population, a more diverse, non-nuclear population, and the inherent lack of sustainability of urban sprawl. Issues of affordability, a natural resistance to change, and a local government planning system that is increasingly under resourced, simply exacerbates the current problem.

It is not an over-statement to say the development profession – developers, architects, planners and contractors – are frustrated by red-tape, and slow and inconsistent approvals processes. The time is ripe for change.

The Institute – which represents the professionals who are the most highly-trained in the design of the built form, and lead consultants on major built form and urban design initiatives – is an eager participant in any reform of the planning system. To that end, the representation of architects on all major strategic planning committees should be a given.

The Reform Agenda

Firstly, we would like to express our support for the five key objectives of the Green Paper, that is that the planning system should be:

- Strategically led
- Legible
- Transparent
- Efficient, and
- Capable of delivering smart growth

We agree that greater community engagement about the function and performance of our city, buildings, transport and public spaces is necessary as Perth transitions to a city of 3.5 to 4.4 million people over the coming 30 years. Our members are keen to work with government at all levels to facilitate those community conversations and the resulting important changes.

However, the Institute and its members have concerns about the role of Design WA in the future planning system, for several reasons that I will outline further below. As background, since the launch of the reform process in 2014 that is now badged as Design WA, the architecture profession has fully supported the ambitions of that suite of policies to bring design back into planning.

Planning and architecture go hand in hand and with an integrated approach that includes design, the outcomes for the built environment can be greatly enhanced. The Institute was honoured to have been invited to play a role in the consultation process of Design WA and our members are generally supportive of those reforms.

Our specific feedback – arranged according to the section headings from the Green Paper – is as follows:

KEY REFORM 1: A STRATEGICALLY-LED PLANNING SYSTEM

We agree that strategic planning is of utmost importance as Perth responds to the challenges of population growth and climate change resilience. We also assert that good design is an integral part of strategy, not a secondary afterthought or a methodology for delivering good strategy. The concept of design excellence needs to be embedded in the strategic planning framework from the outset.

For these increasingly complex projects, design experts are able to:

- Optimise yield, whilst progressing innovative concepts, which include high quality planning, urban design, landscape and architectural built form quality;
- Ensure diversity by providing a range of dwelling types and sizes to attract a diverse range of households and socio-economic groups, including affordable housing;
- Provide a unique and high-quality public realm, including streetscapes, which support pedestrians and cyclists based on evidence-based site analysis, which yield site specific solutions;
- Integrate diversity including employment and innovation clusters to support a successful growing economy, employment, services and infrastructure;
- Integrate transport solutions, which are intermodal and woven into the public realm;
- Deliver developments that are market responsive by being planned with inbuilt flexibility to respond to changing market conditions over time;
- Demonstrate environmental leadership by utilising correct solar orientation for master-planning and individual buildings, which also reduces energy, water, minimises waste, protects biodiversity and ultimately reduces maintenance and ongoing costs to the end user; and
- Guarantee liveability by delivering high levels of functionality and amenity for intended residents, employers, workers and visitors alike.

Metropolitan Perth

The Institute supports a centralised planning authority that provides leadership to shape the greater metropolitan area and asserts that this authority should have unilateral powers to affect change in an effective and timely manner. This authority has had a precedent in the Metropolitan and Regional Planning Authority (MRPA), and this should be reconstituted and resourced in a manner that reflects the urgency of the task at hand.

The absence of such an agency is the root cause of many of the issues and challenges the city faces today. While the Western Australian Planning Commission (WAPC) is an admirable agency and an essential part of a good system, the breadth and depth of its responsibilities and its composition mean that it has neither the commitment, focus, nor the inbuilt mechanisms for coordination of infrastructure, that the former MRPA had.

We believe therefore in the creation of a new Metropolitan Region of Perth planning agency, with dedicated focus and funding delivered via the Metropolitan Region Improvement Tax, with responsibility for the Perth to Peel Region. The new agency should also have autonomy in its staffing, rather than having to compete with other interests for Planning Department staff time and resources.

The MRPA should be empowered to make sweeping, unilateral changes to local scheme texts and policies; to change densities and planning controls to ensure infill targets, distribution of retail and social amenities, coordinate transport and other infrastructures are met. This should include the identification of urban corridors, activity centres, district and local 'hot spots' and provide templates of density and built form for appropriate density. The planning system should be changed so as to shift the onus on local authorities to demonstrate why change should not occur in these designated areas, rather than to occur.

Recommendation 1: that legislation be introduced to create a new, autonomous Perth Metropolitan Region Planning Authority, along similar lines to, and with the same powers, responsibilities and funding as, the previous Metropolitan Region Planning Authority (MRPA), with the geographic scope extended to cover the current Peel Region.

KEY REFORM 2: A LEGIBLE PLANNING SYSTEM

The Institute completely agrees that the current planning regime is complicated by myriad zoning categories, inconsistent application of regulations and local planning policies across the various jurisdictions, which bog down approvals and development. The Institute supports the creation of a universal planning code, to make the regulatory system more legible. That will provide surety and timeliness to the process of the design, approvals and development of projects within the state.

However, we object to the stated intention to ‘dumb down’ the system and its explanatory documents in relation to the assessment of development applications, to cater to the least well qualified or experienced users of the system. We instead support a strategically led system that educates and upskills those persons who lack sufficient education, experience or skills to assess what constitutes ‘good design’.

***Recommendation 2:** the government should demonstrate leadership to identify and describe best-practice design and planning scenarios, and provide the requisite tools and instruments to encourage proponents to strive for those outcomes, rather than succumbing to pressure from parts of the industry that wish to minimise costs by continuing to deliver sub-standard new dwellings.*

KEY REFORM 3: A TRANSPARENT PLANNING SYSTEM

The Institute agrees that a more transparent system can only benefit all of the people, agencies, companies and professionals who work across Western Australia’s vast residential construction sector. Residential construction accounts for 63% of the state’s third largest industry, which contributed a total of \$20.3 billion to Gross State Product (GSP) in 2016-17¹.

We believe it is very important to balance the commercial interests of those proponents who make up this significant sector with strong leadership from government that places design at the forefront of planning, to attain the sustainable and smart living goals of planned development.

The Green Paper cites a case study where a planner had to review a combined 730-pages of documents for one particular site. Of course, we advocate for a more transparent planning system, but would respectfully point out that the system does not need to be navigable by laypeople, any more than the judicial system does.

The professions of architects, building designers, planners and developers exist to guide consumers and landholders through the planning system, just as barristers and solicitors steer and advise their clients through the judicial system.

Structure Plans: Purpose, Status and Complexity

The current structure plans that guide development in Perth have become too complex, too finite, too specific, and too inflexible in application. It follows that, for many users of these instruments, their true purpose is not readily understood. We believe they should be truly strategic, non-statutory, and should set out the essential conceptual and structural elements of land use, transport, etc. for the future development of an identified area. Their status should therefore be decidedly non-statutory, never the subject of legalistic rigidity or interpretation.

¹ http://www.jtsi.wa.gov.au/docs/default-source/default-document-library/wa-economic-profile-0718.pdf?sfvrsn=9093721c_4

Structure plans should be indicative, not determinative, of the type, scale and density or intensity of development. They should certainly not be quasi-subdivision plans. They should be flexible instruments to guide future development, to enable forward planning of infrastructure and community needs generally, and for that reason prepared in close consultation, where necessary, with the infrastructure authorities and agencies. They should be susceptible to review without statutory barriers.

The status of structure plans should be the same as for other strategic plans, and in some cases will be congruent with a local strategic plan. They are the natural predecessor to, and in time made redundant by, statutory plans and schemes.

Recommendation 3: *that, along with the proposals of the Green Paper, steps be taken to ensure that Structure Plans are strategic in nature, legal status and intention, and that they are kept simple, flexible, and under constant review.*

Review of Local Planning Schemes

The practicality of conducting full scale reviews of any and every local town planning scheme was thoroughly discredited many decades ago because it was proven to be both unachievable and, for the most part, ineffective. The requirement for non-statutory strategic plans has gone some way to obviating the need for full reviews, by identifying areas or elements of a scheme where significant change is demanded.

There is also merit in the idea of internal annual reviews of planning scheme performance, again to identify areas or elements of desirable amendment. In any event, it would be more effective to aim for more frequent, partial reviews than the unacceptably long time between comprehensive reviews that have proven to be ineffective.

Recommendation 4: *that, taking the proposals of the Green paper into consideration, the WAPC should initiate an inquiry into the most efficient and effective way to ensure that local planning schemes are kept up to date and responsive to change.*

KEY REFORM 4: AN EFFICIENT PLANNING SYSTEM

We agree that the current scope of the WAPC is too wide, but at the same time argue that its profile doesn't accord enough significance to the importance of good design in the future of smart and liveable cities.

Recommendation 5: *in any future restructure of the WAPC Committees, the government elevates built environment professionals with requisite design skills – including architects, landscape architects and strategic planners – to those committees as a way of embedding good design from the outset of the planning process.*

The Role of Landcorp

We are not convinced of the need to merge Landcorp and the Metropolitan Redevelopment Authority (MRA). However, there is a need for a well-resourced agency or agencies to handle major redevelopment projects and appropriate greenfield and brownfield developments. Ideally, this agency would catalyse and carry out urban redevelopment projects, taking risk and responsibility for the complexities and other difficulties associated with them.

Such an agency would have the ability to undertake joint ventures with landowners and the private sector, and to initiate improvement plans and development schemes (by whatever name). However, and most importantly, it should not have any statutory planning or development control powers, especially not regional planning powers, other than the power to initiate strategic/structure plans and planning scheme amendments.

In addition, the [Metropolitan Redevelopment Authority Act 2011](#) should be amended to remove those powers from the MRA or its successor, because no developer, public or private, should be judge in its own cause.

Incidentally, the origins of Landcorp in the Urban Lands Council gave it an express mandate to intervene in the residential land market to moderate land prices, and hence maintain affordability. But over time, it's key focus changed to maximising, not minimising, land prices. Accordingly, the new agency we propose should be – at least partly – directed with providing affordable housing in redeveloped inner and middle-ring areas, and not merely on the metropolitan fringes.

Recommendation 6: *that the agency resulting from consideration of the merger between the MRA and Landcorp should not have the power to supersede or override statutory planning schemes or instruments, or have development control powers, but should have the power to initiate amendments to schemes and other statutory instruments, including planning policies, affecting areas subject to its responsibility, and should include in its charter express responsibility for providing a significant measure of affordable residential housing or land.*

Delegation of Planning and Development Control Powers

As a matter of principle, the planning system, like any other, should devolve all decision-making to the lowest level consistent with the capacity and competence to take those decisions.

This includes delegating many subdivision decisions (which are in their essence planning decisions) to local planning authorities that demonstrate the necessary level of competence. We support the Review in this long overdue, if minor, reform.

Likewise, many approvals now resting with the WAPC should be delegated to officers of the department or to the local government. Some could possibly be delegated to certified private sector practitioners.

Recommendation 7: *that the potential for delegation of planning decision-making be investigated, and that at the least, the proposals numbered 4.1.1 to 4.1.8 of the Green Paper be implemented.*

KEY REFORM 5: PLANNING FOR CONNECTED SMART GROWTH

We agree that the planning system should focus on achieving high-quality growth to meet the needs of the metropolitan region's growing and diverse population and economy. Much of the groundwork for this objective has already been outlined in the WAPC's metropolitan strategy Perth and Peel@3.5million (2018) plan.

The Green Paper erroneously claims that the Perth and Peel plan allocates additional dwellings to local governments for infill housing without explanation as to how the quantity was derived. No methodology is provided to the local government as to how to carry out an analysis of where additional housing ought to be located or how to balance the need for additional housing with protecting existing character.

However, the Perth to Peel plan specifically refers to the Directions 2031 and Beyond report, and the Directions 2031 and Beyond: Diverse City by Design Factsheets, which together outline the analysis and methodology used to determine the allocation of those nominated 800,000 new homes.

We fear this, and other misinterpretations and errors spotted in the Green Paper indicates a lack of awareness of the breadth and depth of previous reports, analyses and evidence that exists to support smart growth, and the important role that good design has in achieving this goal.

Metronet, Precinct-Based Development and Infill

As trained design experts, including urban design, architects are able to optimise remarkable opportunities to unlock many of WA's key urban renewal precincts and corridors. Well-designed medium and high-density development, properly integrated into an existing community can become a significant community asset that adds to the quality of life for all residents while addressing the needs of a growing and changing population.

With fragmented land ownership in key new infill locations (for instance around the roll out of Metronet) a more sophisticated approach needs to be considered in delivering the denser built form outcomes within these locations.

In addition, we would like to direct your attention to the six key challenges addressed by the New South Wales government in its recent Planning reforms. These include the following broad-based issues:

- Health
- Climate resilience
- Rapidly growing population
- Changing lifestyles and demographics
- Infrastructure and urban renewal
- Providing consistent and timely review of major projects

Recommendation 8: any future overhaul of Western Australia's planning system and implementation of Metronet strategies should take into consideration these key issues and incorporate design-thinking from the outset to fully assess, review and analyse what are often competing and complex requirements in the delivery of new residential neighbourhoods or the densification of development around existing public transport options.

Urban Design and the Public Realm

With increasing complexity of projects associated with transport integrated planning, the need to deliver a high-quality public realm for all Western Australians to enjoy is of paramount importance. As part of the design process, architects consider the space between buildings whilst working on individual built form projects. They are able to develop and communicate density and open space strategies, street hierarchies and optimise pedestrian/traffic movement patterns. In delivering distinctive and positive streetscapes they deliver quality urban design to our suburbs, towns and cities.

Urban design is intrinsically reliant on a planning system which is able to discern and deliver quality spaces that become the fabric of our towns, cities and suburbs. As architects are primarily the urban designers of Western Australian projects, they should be involved in reforming the Planning system to meet aspirational outcomes.

Returning to the topic of health and its implications for urban design and the built realm, we draw your attention to the Heart Foundation's Healthy Active by Design guidelines, which provide details of how to encourage people to build more activity into their day through design. These are just one set of a number of new resources that focus on the nexus between design, health and well-being at a macro level.

<http://www.healthyactivebydesign.com.au/design-features/buildings>

Recommendation 9: *that the government incorporates considerations related to health and exercise of residents through design and planning policies, to create buildings and places that enhance health and well-being and encourage people to incorporate deliberate and incidental exercise into their daily routines through the provision of adequate facilities for walking, cycling, sports and recreation.*

Impacts of the Planning System on Housing Choice and Affordability

The Institute has a Housing Affordability Policy Paper that advocates for an adequate supply of new housing that is diverse, affordable, sustainable, and supported by the community. (Please see a copy of our position at the end of this document.) In addition, the architectural profession boasts the necessary design and problem-solving skills to develop housing solutions that address crucial issues such as sustainable design, universal access, and user amenity, to deliver housing that is as affordable in its upfront cost as it is for the lifetime of its occupancy.

We believe that while providing an adequate flow of land for development on the fringes is a major challenge, a far more significant problem is the need to meet the demand for redevelopment sites within inner and middle-ring suburbs, especially to provide for affordable housing at higher densities. The planning system addresses this issue by zoning land for higher densities, although arguably, for a number of reasons, there is not sufficient land release to satisfy demand at affordable levels.

However, appropriate zoning has not proved sufficient in itself to induce change, especially at affordable levels, despite the fact that there is a significant amount of existing housing that is both outdated and occupied by residents for whom smaller dwellings on a lesser footprint of land in the same locality would be preferable.

Also, while urban infill is recognised as being essential, infrastructure issues continue to add costs to these development types. In particular, low water pressures on existing sites require the inclusion of expensive pumps and tanks, and the Department of Fire and Emergency Services applies higher standards than those stipulated in the eastern states. This affects affordability, and a more wholistic approach to infrastructure and the application of head works is required.

There is, consequently, a critical need for the planning system to address the problem of how to encourage more and higher quality redevelopment. There are two closely related aspects to this: design and economic incentive. From both design/amenity and financial points of view, it is generally recognised that there are disadvantages to lot-by-lot redevelopment and corresponding benefits that follow from site amalgamation, to create more optimum development sites.

The difficulty lies in how to determine – in particular areas and for particular types and densities of development – which are the optimum area sites. That is essentially a design question. It demands detailed investigation by architects, not planners. The answers will, of necessity, be conditioned by desired dwelling type, desired density, the shape and area of existing lots, and their orientation. The community urgently needs architecturally designed models to guide the planning provisions.

The so-called ‘missing middle’ – the current zones defined by R30-R60 – has created the most problematic built form outcomes for the development industry, because they fall below the threshold of Design Review Panels. This is particularly important as it often affects residents in areas of marginal amenity. Removing some of these controls from Design WA and leaving them within the R-Codes means that this basic issue has been avoided. Consequences include the extensive loss of tree canopies, designs with no regard to aspect and outlook, and generally poor quality of construction.

The Institute asserts that this is the area most in need of urgent reform.

Recommendation 10: *that the WAPC should commission a detailed and comprehensive set of studies, by architects experienced in residential design, with the aim of identifying the optimum ranges of redevelopment site areas and dimensions, covering the full range of desirable dwelling types and having regard to common existing lot areas and their orientations.*

There is also a question about how to ensure these optimum development sites will actually be created, which relies on the provision of sufficient financial incentive(s) to encourage owners to sell or band together to amalgamate land. The obvious response to this is to link desirable density to desirable site size: in most cases, coding the land to allow higher density only where the appropriate lot size and other conditions are achieved.

Recommendation 11: *that the WAPC initiate an investigation into appropriate incentives for encouraging appropriate redevelopment in inner and middle-ring suburbs, including but not confined to density incentives and measures to enhance the acceptability and quality of redevelopment.*

In closing, we would point out that in its three-yearly report card on Development Assessment frameworks around Australia, undertaken by the Property Council and published in 2015, the report nominated Western Australia (along with the Northern Territory) as the state with the most progressive planning reform agenda in the country.

I quote from that report:

“WA has the most comprehensive reform blueprint of all the states and territories and has chipped away handsomely at its reform agenda. It performed particularly well in advancing its strategic policy base with the West Australian Planning Commission (WAPC) playing an increasingly noticeable role in overseeing the implementation of planning strategy. WA has also undertaken a substantial review of the role of metropolitan local councils, although reform in this area had stalled at the time of writing this report.”²

Unfortunately, that significant advantage has been lost as the result of delays to the gazettal of Design WA’s planning reforms – which many local councils have already begun using to great effect – and this latest Independent Review defers its implementation even further. As a result, the entire industry lacks certainty around future strategic planning directions, and the status quo of poor-quality design and sub-standard apartment developments persists.

² Development Assessment, Prosperity, Jobs, Strong Communities, Property Council, 2015, www.propertycouncil.com.au/downloads/submissions/DAreportcard2015.pdf

The Importance of Architectural and Urban Design

Notwithstanding Design WA, the value of design – both architectural and urban – is barely recognised in the Green Paper. The quality of design of buildings, both intrinsically and in their relation to each other and to the streetscape and other public spaces, is vitally important to the amenity and enjoyment of the public realm.

There are several sets of measures within the planning system that can and should be employed, to raise the quality of the urban environment.

The Institute and its members are in principle extremely supportive of Design WA, which over the course of three years has received bi-partisan political support and been subjected to rigorous and extensive consultation with key stakeholders in the construction industry and the community at large. This document, and the principle within it, has already been referred to in numerous local government jurisdictions as being a requirement for good development.

Changes to the document at this stage should be minor, and as suggested by the Green Paper, confined to simply making the document more proscriptive. The Institute does suggest that acceptable plot ratios associated to any given zoning should be described as a range, and that high plot ratio is clearly incentivised to deliver good design, whilst paying due regard to over-shadowing, privacy, and an appropriate response to local context and streetscape etc.

With the increasing focus on difficult built form implementation of density in sensitive areas, the idea of a good design, first principles approach, rather than a ‘deemed to satisfy’ criteria, should be embedded in the planning system. The introduction of Design WA has sought to achieve this, and this should be pursued through this proposed Green Paper planning reform.

Design WA allows developers to respond to the characteristics of each site and suburb, and to create innovative and diverse design solutions against some important minimum standards. The result is a set of guidelines that protects consumers – and the future value of their assets – and maximises developer yield by prioritising design excellence.

Design WA and its supporting implementation strategies will also relieve pressure on local government authorities by streamlining existing planning policies and R-Codes, thereby reducing red tape. It will provide a consistent approach across all jurisdictions, and is supported by training being developed in conjunction with the Australian Urban Design Research Centre (AuDRC), to upskill built environment professionals.

The planning system should be re-orientated to take advantage of the investment the state makes in the training of professional built form experts such as architects, planners and landscape architects. A system of self-certification, or at least peer review under the auspices of design review panels, that reduces red tape and approvals time, and alleviates the bottle neck of under resourced local authorities should be urgently implemented.

This approach has proven extremely effective in New South Wales via the SEPP 65 model and should be re-considered as a matter of urgency for Western Australia. In NSW, developers that initially opposed the introduction of the policy – citing higher costs stemming from design benchmarks and compliance – have spoken about the benefits that have flowed from its adoption. According to a review of SEPP 65 undertaken in 2014:

“Research, feedback and anecdotal evidence all point to the policy’s success. Harry Triguboff, the founder and managing director of residential developer Meriton and the sixth richest person in Australia according to Business Review Weekly’s 2013 ‘Rich 200’ list, has been noted to say that Meriton has ‘done well’ since the introduction of SEPP 65, with apartments [of better quality] selling better.

A survey conducted by the Property Council of Australia seven years after the introduction of SEPP 65 showed that 82 percent of respondents agreed that it had led to improved design, and with a relatively minor impact on affordability.³ The dividends from good housing are very broad and, as with city planning, good intent can have positive knock-on effects. Increased opportunity, satisfaction, security and wellbeing all stem from the quality of the built environment...

SEPP 65 has helped to reduce the impact of self-interested, random and uninformed opinions on housing outcomes and has preferenced informed review for the sake of ‘the greater good’. It has also established a critical distance between the vote-seeking local councillor or small self-interest group and more holistic approaches to urban design.”⁴

Recommendation 12: *that the following measures be adopted:*

- *A clearer, stronger and more positive role for policies such as Design WA, suitably framed;*
- *The Institute is aware that there is currently very little support within the government or the development industry for mandating the use of architects in apartment design, but we reiterate that this approach has been successful in Sydney and other major cities around the world in raising standards across the board. We therefore maintain our position on the mandatory involvement of architects in the design of all apartments above a three-story threshold, as per the SEPP 65 provisions in New South Wales;*
- *The mandatory use of professional Design Review Panels for all planning applications involving buildings or public spaces impacting on heritage or meeting defined criteria; and*
- *For the planning profession to promote the mandatory elevation of design appreciation skills, both within university planning courses and in subsequent professional development programs.*

If implemented as intended, Design WA has the potential to position Western Australia at the forefront of residential planning reform in Australia once more, by enshrining the positive community benefits of design excellence in our planning codes. We at the Institute are pleased to have played a part in the development of the policy and its instruments, and our members look forward to seeing years of hard work come to fruition.

In closing, we would like to thank you as the Independent Reviewer and Design Review Team for the opportunity to provide the Institute’s feedback on this proposed overhaul of Western Australia’s planning system. Our members are keen to lend their expertise to this important reform agenda as the government formulates the next steps including the upcoming White Paper and subsequent planning reform, and we look forward to participating in this process going forward.

³ Glenn Byres, NSW executive director of the Property Council of Australia, in a letter to the NSW Department of Planning and Infrastructure, 19 July 2011 (citing survey results from 2009).

⁴ Improving the quality of housing, Lindsay and Kerry Clare, Architecture Australia – May 2014 (Issue 3) <https://architectureau.com/articles/improving-the-quality-of-housing/>

Please direct any queries in the first instance to the Institute's Executive Director Michael Woodhams at michael.woodhams@architecture.com.au or 08 6324 3100.

Yours sincerely



SUZANNE HUNT FRAIA
PRESIDENT WESTERN AUSTRALIA

cc: Hon Rita Saffioti MLA, Minister for Planning
Mr John Carey MLA, Parliamentary Secretary for Planning
Hon Liza Harvey MLA, Shadow Minister for Planning

Attachments: Australian Institute of Architects' Policy on Affordable Housing
Executive Summary of Recommendations

Affordable Housing Policy

CONTEXT

Housing is a basic human need and universal human right, and in the rapidly expanding cities and towns of the twenty-first century, there is a critical need for more flexible and diverse housing solutions. New housing stock needs to be integrated with transport and social infrastructure and much greater diversity beyond simple models of homogenous suburban boxes or regimented apartments. In the face of social and demographic change, growing economic inequality and global issues such as climate change, the architectural profession offers the design and problem solving skills to deliver more affordable, dignified and accessible housing, reducing both upfront and ongoing costs. All financial levers to make housing more affordable for owners and renters need to be regularly examined for their effectiveness

THE POLICY

The Australian Institute of Architects endorses the following:

- The design and problem solving skills of architects are crucial to the provision of affordable and accessible housing in Australia
- Mandated targets for social and affordable housing and incentives for flexible and diverse housing types
- Housing that is affordable, sustainable, and of high amenity achieved through clever design strategies, including smaller, energy-efficient dwellings; cost-effective, space-efficient and quality controlled mass housing; and the adaptation of existing housing stock to accommodate multi-generational families, and support ageing-in-place
- A focus on multi-residential developments and urban consolidation as the sustainable and affordable solution to the increasing demand for housing in dense urban environments
- Investment in design quality and mandated use of architects for medium and high density housing projects nationally
- Moving Australia towards net zero carbon emissions for the housing sector by 2050

8 August 2018



Australian Institute of Architects

MODERNISING WESTERN AUSTRALIA'S PLANNING SYSTEM

Summary of recommendations

Recommendation 1: that legislation be introduced to create a new, autonomous Perth Metropolitan Region Planning Authority, along similar lines to, and with the same powers, responsibilities and funding as, the previous Metropolitan Region Planning Authority (MRPA), with the geographic scope extended to cover the current Peel Region.

Recommendation 2: the government should demonstrate leadership to identify and describe best-practice design and planning scenarios, and provide the requisite tools and instruments to encourage proponents to strive for those outcomes, rather than succumbing to pressure from parts of the industry that wish to minimise costs by continuing to deliver sub-standard new dwellings.

Recommendation 3: that, along with the proposals of the Green Paper, steps be taken to ensure that Structure Plans are strategic in nature, legal status and intention, and that they are kept simple, flexible, and under constant review.

Recommendation 4: that, taking the proposals of the Green paper into consideration, the WAPC should initiate an enquiry into the most efficient and effective way to ensure that local planning schemes are kept up to date and responsive to change.

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Recommendation 8: any future overhaul of Western Australia's planning system and implementation of Metronet strategies should take into consideration these key issues and incorporate design-thinking from the outset to fully assess, review and analyse what are often competing and complex requirements in the delivery of new residential neighbourhoods or the densification of development around existing public transport options.

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Recommendation 12: that the following measures be adopted:

- A clearer, stronger and more positive role for policies such as Design WA, suitably framed;
- The Institute is aware that there is currently very little support within the government or the development industry for mandating the use of architects in apartment design, but we reiterate that this approach has been successful in Sydney and other major cities around the world in raising standards across the board. We therefore maintain our position on the mandatory involvement of architects in the design of all apartments above a three-story threshold, as per the SEPP 65 provisions in New South Wales;
- The mandatory use of professional Design Review Panels for all planning applications involving buildings or public spaces impacting on heritage or meeting defined criteria; and
- For the planning profession to promote the mandatory elevation of design appreciation skills, both within university planning courses and in subsequent professional development programs.