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Design WA - Precincts
Department of Planning, Lands and
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Date
15.10.2019

Dear Design WA - Precincts Team,

On behalf of the WA Chapter of the Australian Institute of Architects, we would like to congratulate you on the release of the SPP 7.2 Design WA Stage 2 - Precinct Design for public consultation. The proposed planning policy is innovative and recognizes the relevance of sense of place, environmental and social factors in the provision of better urban planning.

As the peak body for architecture we represent over 11,500 members globally and are committed to raising design standards and positively shaping the places where we live, work and meet. As such, we welcome the opportunity to provide comments on behalf of our WA Chapter members.

Please refer appended pages for comments.

Kind regards,

Beata Davey
Policy & Advocacy Manager



SPP 7.2 Design WA Stage 2 - Precinct Design Commentary:

General: (Question 1 & 2)

SPP 7.2 contains the key elements for community planning with a focus on sense of place. In general, the guideline:

- Shows more sensitivity toward local character and form;
- Recognizes the need to integrate existing urban features into the planning context, at Town Planning Scheme (TPS) level;
- Recognizes the inadequacy of existing instruments for planning in urban infill areas;
- Recognizes heritage as a component of great precinct planning; and
- Recognizes environmental and social factors as a consideration in successful precinct planning.

Determining Authority: (Question 3)

- The definition between Complex Precinct Plan and Standard Precinct Plan requires further articulation. Similarly, the trigger for requirement or opted benefit of Precinct Planning requires further articulation.
- Where the requirement or extent is unclear, the Planning Commission is the final determiner of whether precinct plans are required and the proposed boundary extent of precinct. Further reporting, deadlines and guidelines on this process need to be articulated. This may become a potential resourcing / time delay issue, particularly during the transition period of implementation of guideline.
- Third category (e.g. Basic Precinct Plan) may be beneficial to be adopted for simple precinct plans, where advertising / public consultation is not required.
- Some of our members have experienced issues when decision(s) fall to elected members of the local authority, as their decisions are likely to be influenced by the most vocal constituents. Suggest the determiner is clearly considered, articulated with transparent processes to minimize future conflicts.

Identification of Precincts (Question 4)

- Sites of high heritage significance should be added as a trigger for precinct planning.

WAPC Determination (Question 6)

- It is generally viewed as beneficial that the WAPC will be able to require the preparation of precinct plans, rather than being reliant exclusively on LGAs.
- There appears to be insufficient notice of a Structure Plan if issued for community comment. Preferable to align to LPS time-frames.
- Additional guidelines/department proformas to achieve effective community consultation and standardized reporting (so as to obtain consistency of outcomes and metrics) would be a useful tool as an adjunct to the SPP.
- There is potential for multiple community consultation processes at different stages of planning (i.e. precinct planning, individual DA's); it may be beneficial to engage consultation at highest level, where there is a single developer to ensure consistency of approach.

Advertising Time-frames (Question 7)

- 42 day advertising period may be insufficient for complex precinct plans (e.g. Canning Bridge Activity Centre Plans). Interested stakeholders require time to prepare meaningful comments including preparation of diagrams and run test scenarios.



Risk-based processes (Question 8)

- These are generally supported. Safeguards for 'unintended consequences' need to be implemented, where initially perceived simple plans become complex in nature. Early and robust assessments which identify potential complexities and articulate frameworks may be required.

Assessment Timeframes: (Question 9)

- We suggest a fast-track process for developers opting in for assessment via Design Review Panels (DRP's). A precedent of such a process currently operates in South Australia.

Design Review Panels: (Other comments)

- SPP7.2 proposes Precinct Plans to be reviewed and assessed by DRP's. Some members express concerns regarding the qualification, suitability, experience and training of the DRP members to provide meaningful, constructive and non-controversial review.
- SPP7.2 proposes performance based assessment similar to SPP7.3. It has been the experience of many of our members that many local authorities do not have expertise to assess precinct plans on a performance criteria format. This has resulted in some authorities appropriating the criteria to a tick the box or compliance exercise. Local authority planners, the DRP and other relevant assessing bodies require adequate training / resourcing to ensure objectives of the codes are being implemented.
- DRP's are advisory in nature and as such do not have authority to determine performance criteria, however often possess best skill for such assessment. Consideration of the weight of DRP's assessment needs further examination.

Density Transition: (Other comments)

- Articulation and guidance is required as to urban transition within Precinct Plans from low density to higher density or from existing context to future context. Some members have experienced mis-appropriation of the Planning and Development (Local Planning Policy) Regulation 2015 Clause 67M (impact on existing context) as a reason to reject development applications, even when the developments have satisfied all the criteria/objectives of the activity center plans or precinct plans. To alleviate confusion, the Planning and Development (local Planning Scheme) Regulations 2015 should also be updated to align with new planning reform.

Process Overall: (Other comments)

- The process aims to reduce red-tape and ensure more efficient and consistent planning process. It is unclear, without giving DRP's authority to determine Precinct Plans or an articulated fast-tracked process, how this will be achieved.
- A process that allows detailed review of Draft Precinct Plans should be allowed for. Members have experienced Activity Center Plans or Planning Frameworks which have been implemented with contradictions between built-form and other planning requirements (e.g. plot ratio and building envelope). These contradictions have had the effect of legal disputes and/or under-utilized land potential. Independent consultants engaged by the WAPC direct to test Draft Precinct Plans for inconsistencies is an option whereby the above issues could be minimized or alleviated all together.



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