

16 December 2013

Department of Planning
Gordon Stephenson House
140 William Street
Perth WA 6000
By email: planningreform@planning.wa.gov.au

Dear Sir/Madam,

Planning Makes It Happen: Phase Two

1.0 Introduction

The Committee for Perth strongly supports planning reform and commends the State Government for its planning reform agenda and for the comprehensive reforms it has achieved since the launch of *Planning Makes it Happen – a blue print for planning reform* in 2009.

The Committee's strategy *Towards a Bright Future – A Blueprint for Perth's Future*, identified planning reform as critical to enabling Perth to achieve a positive transformation to a bigger, more innovative, prosperous, responsive, livable and sustainable city in the future.

The Committee for Perth therefore strongly supports the planning reform process and applauds the State Government and the Western Australian Planning Commission in driving planning reform in the State. We also commended the State Government for applying the principles of the Development Assessment Forum's Leading Practice Model.

We believe that the Western Australian planning system is already one of the best in Australia and it is our view that the reform process could be strengthened by providing a high level, over-riding goal for the reform process – a goal such as '*developing Western Australia's planning system as the most progressive, responsive and innovative planning system in Australia*'.

As you are aware the Committee for Perth's primary interest is in high level strategic issues and initiatives that will influence the effective governance of the Perth metropolitan region.

The Committee has therefore focused its response to the discussion paper on the high level strategic issues outlined in Chapter 4, in particular the role of the Western Australian Planning Commission, the role and function of the Infrastructure Coordinating Committee and Design and Development.

The Committee for Perth is also a strong advocate for local government reform and in this capacity we believe that it is essential that the proposed planning reforms are delivered

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efficiently to ensure that they can inform the development of new local planning schemes following the proposed local authority amalgamations.

In this context we believe that the priorities for the reform process should be:

- Initiatives identified in Section 3.5 including reviewing the Model Scheme Text, improving local planning scheme review processes and streamlining the content and process of preparing local planning strategies; and
- Initiatives to improve local planning scheme amendment processes (Section 3.6).

It is also important that the State completes the preparation of sub-regional structure plans to ensure that Councils are provided with clear guidance on what is to be included in new planning schemes.

2.0 Enabling Planning Reform

While the Committee for Perth strongly supports planning reform it is critical that the reform process is enabled through both cultural change and adequate resourcing of the agencies and departments responsible for delivering reform.

The Committee has concerns that, even if processes are streamlined, reform outcomes will not be met if organizational cultures do not fully embrace the changes. They will also not be met if organisations such as the Department of Planning are not adequately resourced.

Therefore, while we respect the need for State Government budgetary constraint, we urge the government to closely monitor the performance of the Department of Planning in processing applications and ensure that resourcing remains adequate to deliver the benefits of the reform process.

We also urge the State Government to work with government organisations and relevant industry bodies to assist in the cultural and organizational change that may be required to accommodate planning reform. Poor or inadequate planning decisions today could result in long term regional inefficiencies and future budget costs.

3.0 Comments on Proposed Reform Initiatives

4.2 The Role of the Western Australian Planning Commission

The role of the Western Australian Planning Commission is, in our view, one of the most critical issues influencing the future development of the Perth metropolitan region and we strongly support the proposed review of the Commissions functions.

As you may be aware the Committee for Perth has played an active role in calling for reform of governance in the Perth region with an aim to achieve a governance structure that will best enable Perth to cope with the pressures arising from a growing population whilst at the same time improving our global competitiveness as a mid-tier city.

In this regard our research indicates that metropolitan regions need strategic visions and integrated infrastructure planning and that implementing this requires a level of regional governance as well as a high level of cooperation and collaboration between government bodies and agencies operating in the region.

There is a direct correlation between cities that are rated as highly 'liveable' and cities with larger local authorities and systems for formal regional governance or regional co-operation.

The Committee for Perth is aware that, in lieu of a formal level of regional governance in Perth, the State Government has performed a regional governance role and that the Western Australian Planning Commission is the body with statutory responsibility for regional land use planning which includes the co-ordination and integration of land use, environmental, transport and infrastructure planning.

We believe that the ability of the Western Australian Planning Commission to deliver this role should be strengthened.

As such the Committee for Perth supports the proposed review of the functions of the WAPC and strongly supports the objective for the WAPC to operate as a separate board of management from the Department of Planning, however we request that the review explicitly considers the role of the Western Australian Planning Commission in administering and enabling integrated statutory and strategic planning in the Perth metropolitan region (as opposed to its' state wide functions).

It is our view that, given the importance of the Perth metropolitan region to the state; and the complexities of land use, infrastructure, environmental and social planning in the region; the WAPC should be structured in a way that best and explicitly enables it to provide leadership on issues affecting the Perth region, in conjunction with fulfilling its state-wide role.

We also request that an opportunity is provided for stakeholder input and involvement into the review process.

4.3 Infrastructure Coordinating Committee

The Committee for Perth strongly supports the proposed review of the role and functions of the Infrastructure Coordinating Committee (ICC).

The ICC has a central role in enabling the timely, efficient and integrated delivery of infrastructure and services in the Perth region and it is therefore critical that clear guidance is provided in regards to its role and function and the type of matters it should be involved in. It is also crucial for the ICC to be guided by the Chairman of the WAPC with a clear terms of reference and work program.

The Committee for Perth also strongly supports the proposed review of ICC membership to ensure that the ICC has a high level strategic focus and asks for consideration of private sector representation too.

However we request that the review also specifically considers the role and function of the ICC in the Perth metropolitan region and how the Committee can best be structured to deliver improved integration in the planning and delivery of infrastructure in the Perth region as a separate and specific function to its role in the state.

4.1 Design and Development

Design has an important role to play in delivering high quality development outcomes in Perth, and the importance of design will increase as the proportion of infill development grows and there is pressure for delivery of affordable housing units.

The Committee therefore supports the identification of planning opportunities to deliver improved design outcomes, however care must be taken to ensure that the introduction of design requirements does not add undue time and cost to the development process.

As such, the Committee supports the work completed by the Office of Government Architect on the policy 'Better Places & Spaces' and would support the development of similar design manuals that enshrine the importance of and principles for quality design, including architectural, urban, landscape and environmentally sensitive design.

Appropriate provisions could also be developed for inclusion in local planning schemes which aim to ensure that developments over a certain value have been designed by an appropriately qualified professional and meet a level of determined design standards.

We support the general intent that larger local government should establish Design Advisory Panels of appropriate professionals and/or city architect positions on the basis that where Design Advisory Panels have been instigated, over time the level of experience and skills sets exhibited by participating council officers has substantially increased.

We therefore suggest that consideration is given to integrating design considerations into existing approval processes, for example by requiring assessment by appropriately qualified council officers, or by incorporating design considerations into the DAP process.

Comments by Report Section

Section	Draft Comment
3.1 Review of the Metropolitan Region Scheme	<ul style="list-style-type: none"> • Support proposed amendments and review • Suggest that the review incorporates consideration of reservation requirements for light rail.
3.2 Improve amendment process for regional planning schemes	<ul style="list-style-type: none"> • Support proposed amendments to procedures to amend regional planning schemes. • Support proposed amendment to process for referral of proposed amendments to the EPA to enable exemptions. • Support the consideration of reductions to public advertising periods for Division 3 and 4 amendments.

3.3 Sub-regional structure plans to amend region planning schemes	<ul style="list-style-type: none"> • Support the proposed amendment to the Planning and Development Act to enable automatic or concurrent amendment to a regional planning scheme to reflect the relevant zonings of a sub-regional structure plan once the structure plan is given final approval • It is critical that the community is still provided with adequate opportunity to provide input into the process and is made aware of the concurrent amendment process.
3.4 Concurrent amendment of region planning schemes and local planning schemes	<ul style="list-style-type: none"> • Support proposal
3.5 Improve local planning scheme review process	<ul style="list-style-type: none"> • Suggest that these initiatives are progressed as a priority. • Support the development of standard MST provisions to apply to all local government schemes. • Support the review of approval requirements. • Support improvements to administrative provisions. • Support amendments to regulations to make the scheme preparation and amendment process clear. • Support both streamlining the number and content of local strategies and consideration of a ten year major review timeframe for local planning schemes. • There is a need to consider the extent and requirement of local government policies and for the State to provide guidance notes to local governments on the requirement, content and need for such separately developed policies.
3.6 Improve local planning scheme amendment process	<ul style="list-style-type: none"> • Support proposal to modify the process for referral of proposed amendments to the EPA, such that certain amendments with no relevant environmental considerations are not required to be referred to the EPA (with formal EPA agreement). • Support further consideration of the proposal to introduce a 'minor scheme amendment'.
3.7 Streamline structure plan process	<ul style="list-style-type: none"> • Support the preparation of model local scheme provisions to guide the preparation of structure plans. • Support the elimination of the need for dual approvals for structure plans however suggest that local authorities are the single point of determination rather than the WAPC, with the retention of applicant right of appeal to SAT. This is on the basis of both resource requirements for the WAPC/Department of Planning and efficiency of process given that local authorities undertake the majority of liaison with applicants in the local structure plan preparation process and are therefore best placed to assess it.
3.8 Develop a track-	<ul style="list-style-type: none"> • Strongly support the development of a track based (risk

based development assessment model	<p>assessment) development assessment model using the Development Assessment Forum model as a base and modifying it to suit Western Australia, with the WAPC to act as the guiding authority for local authority implementation.</p> <ul style="list-style-type: none"> • Suggest that track based assessment should also be applied to the Department of Planning.
3.9 Private certification of development applications	<ul style="list-style-type: none"> • Support the investigation of private sector involvement in the approval system, with preference for the Brisbane RiskSmart model or a system similar to the existing Western Australian building code compliance system. • Need to develop a system of accreditation for planning professions in conjunction with the Planning Institute of Australia. • Support the linking of this process to the proposed track based assessment model.
3.10 Standardise delegations of local government development decisions	<ul style="list-style-type: none"> • Support the preparation of the Model Delegation Schedule.
3.11 Electronic application system	<ul style="list-style-type: none"> • Support the development of a full electronic processing and approval system.
3.12 Refining the Role of Development Assessment Panels	<ul style="list-style-type: none"> • We suggest that mechanisms are in place to ensure consistency in decision making criteria and that a review system is implemented to regularly assess decision making quality. • Support a review of optional and mandatory thresholds. • Support the expansion of thresholds to allow smaller scale residential proposals where the proposal is of local significance. • Support the proposed reduction in the number of DAP panels. • Support the proposal that any 3 members constitute a quorum, and 1 must meet the requirements to act as the presiding member.
4.1 Design and development	Refer to main text
4.2 Role of the Western Australian Planning Commission	Refer to main text
4.3 Improve the function of the Infrastructure Coordinating Committee	Refer to main text
4.4 Local	<ul style="list-style-type: none"> • Support the proposal for local government accreditation and

Government Planning Accreditation	suggest that this could enable increased autonomy of local government decision making where appropriate.
4.5 Funding of region planning schemes and initiatives	<ul style="list-style-type: none"> • Support the identification of options for other region planning schemes and improvement schemes in areas of the State outside the Perth metropolitan area.
4.6 Administrative review of the Planning and Development Act 2005	<ul style="list-style-type: none"> • The Committee for Perth supports the review of the Planning and Development Act 2005 to ensure the long term effectiveness of the legislation.

4.0 Concluding Comments

Thank you for the opportunity to provide input into the planning reform process. We again commend the State Government for initiating the process of planning reform and look forward to the implementation of initiatives identified in the Discussion Paper.

Yours sincerely,



Marion Fulker
CEO