



Australian Institute of
Landscape Architects

30 August 2021

Ms Jodi Cant
Director General
Department of Planning, Lands and Heritage

AUSTRALIAN INSTITUTE OF LANDSCAPE ARCHITECTS (AILA) SUBMISSION ACTION PLAN FOR PLANNING REFORM

Dear Ms Cant,

The Australian Institute of Landscape Architects (AILA) would like to thank you and your teams for the invitation to comment on the Action Plan for Planning Reform, released by the Department of Planning, Lands and Heritage for public comment in May 2021.

The Australian Institute of Landscape Architects (AILA) leads a dynamic and respected profession: creating great places to support healthy communities and a sustainable planet. AILA is the peak national body for landscape architecture. AILA champions quality design for public open spaces, stronger communities, and greater environmental stewardship.

We provide our members with training, recognition, and a community of practice to share knowledge, ideas, and action. With our members, we anticipate and develop a leading position on issues of concern in landscape architecture. Alongside government and allied professions, we work to improve the design, planning and management of the natural and built environment.

In operation since 1966, AILA represents over 2,500 members Australia wide and promotes excellence in planning and designing for life outdoors. Committed to designing better places, Australian landscape architects have the skills and expertise to improve the nation's liveability through integrated nature-based solutions delivering better environmental, social, and economic outcomes for all Australians.

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Action Plan for Planning Reform

Conversations with our members confirms that the interests of Landscape Architects, such as the quality of life for residents and visitors to WA, the natural and built environment, community, and respect for cultural values, apply to many of the proposed Planning Reform initiatives.

Please find our collective response to the Action Plan below.

In general, AILA sees the Action Plan for Planning Reform as an important and positive step forward for an approval process that has become overly complex. We agree that this reform initiative would help streamline and align approval processes across different sectors and levels of government.

We support the Action Plan's intent to transform the Western Australian planning system:

- to be open, transparent, and easy to navigate; and
- shift from a statutory focus to a strategic focus to create better outcomes for everyone.

We have supported the State Government's approach since the formulation of these goals from the commencement of the Planning Reform process in 2016 and applaud the progress that has been made in the implementation to date.

We support the continuation of the Planning Reform as outlined in the Action Plan of May 2021, and we would like to take this opportunity to offer some further suggestions from our profession's perspective. These are;

- the streamlining and simplifying of the planning process
- facilitating the shift from a statutory-led to a strategic-led planning process
- ensuring there is expertise in the WAPC regarding landscape and public realm issues
- ongoing collaboration and direction
- improving transparency to the community.
- clarifying specific policy details and how they are implemented.



Streamlining and simplifying the planning process

AILA recognizes the complexity of the Planning Reform tasks ahead and we support the intent to streamline and simplify the process.

WA is a State that is both expansive and diverse with a broad range of climates and cultural values. To this end we feel that an overly standardised approach will compromise certain aspects of planning through its implementation and consequential outcomes, and we believe the WAPC Reform actions should provide central objectives to further improve:

- a diversity of planning solutions better suited to the local climatic conditions and community aspirations; and
- flexibility to innovate, i.e. allowing for tailored solutions designed to address local cultural and environmental conditions, leading to new insights and solutions that respect diversity across WA.

Strategic led planning process

AILA believes that the intent to transform the planning system from statutory-led to strategy-led is the right approach, i.e. being respectful of local character and values.

AILA supports initiatives that focus on 'standardising process' where this helps with consistency in interpretation and avoids unnecessary differences and/or contradictions in policy. Measures such as the online portal to track development applications and a streamlined pre-lodgement model, comparable to what many LGA's are already doing for the applications that are reviewed by their Design Review Panels, are also supported. We further acknowledge that the roll out of the Design Review Panel is still at variable levels of implementation across different government agencies and further standardisation of format and consistency requires development dependent upon location and context.

Conversely, AILA does have some concern regarding initiatives that may 'overly standardise' the content or planning in relation to land-use zoning and standardised conditions within policies. The option to standardise might appear economically attractive but it can also undermine the best planning and design outcomes, thus impacting upon the local community, the environment and ultimately the sustainability of a project. In this regard AILA



would like to see a greater level of contribution from the profession at a policy development stage as has been the case in other states in Australia (see below for further details).

AILA applauds the growing understanding of the importance of "Landscape" in recent planning legislation, such as DesignWA, where it features as the second of the ten Design Principles.

AILA's values are centred on creating great places for people with individual, sustainable, and respectful solutions. We support initiatives that improve the quality of plans, create greater transparency, and assist people in their journey through the planning system in a positive way. We do not support standardising planning content that could result in problematic process due to misinterpreted policy applied in different ways across a diverse, multi-level governance framework. The professional status of AILA's members is now well-established with state government agencies, and across many LGA's in WA. However, there are many places that have limited access to AILA's members and professional advice. How to provide this advice will need further development as part of planning reforms in future.

Expertise in the WAPC with regard to landscape

AILA sees the proposed Legislative Changes to the Planning and Development Act 2005 as a great opportunity to contribute, applauding the initiative, and welcoming further consultation through our state membership.

We would also be more than willing to share 'lessons-learnt' from our national membership in other states with regard to planning reform and green infrastructure.

We believe that the best approach to achieving sustainable planning solutions is to accommodate local community needs and aspirations, ideally with convenient access to professional expertise at all levels and facets of the planning system as applicable to the context in which it is to be applied. Of note: AILA acknowledges there are identified gaps in the composition of the Western Australian Planning Commission (WAPC) and that there is potential to fill these with the Planning Reform Stage 2.

AILA is of the opinion that the most significant gap sits within the legislation. The WAPC Act 1985 defines 12 roles on the WAPC, including 1 expert for coastal planning and 2 experts in urban and regional planning, engineering, property development and the like. However, the



specific expertise of people-focused places, landscape analysis, biodiversity, green infrastructure, and cultural values - expertise provided by landscape architect - is currently under-represented in the legislation.

AILA considers that such Reform is extremely timely and advocates for a change to the legislation to include one person with Landscape expertise on the WAPC, with potential for that individual to grow this advisory role to help advance planning process at state, local and regional government levels in WA.

AILA are willing to assist WAPC in any way we can, to reduce further gaps within the ranks of state planning and infrastructure agencies. We propose an approach that is goal-directed and results-oriented to reduce referrals timeframes and to garner an overarching and inter-agency, collaborative synergy between DPLH/OGA, WAPC, MRWA, LGA's and professional bodies. In this regard AILA is willing to extend our continuing professional development program, offering CPD points for educational sessions, casting the message widely across the multiple sectors to ensure proposed planning reforms are implemented swiftly and consistently across the landscape discipline. We believe setting simple institutional milestones will achieve tangible outcomes within a specific timeframe.

We applaud the moves that have been made in recent times with the incorporation of landscape architects into the OGA and the role out of landscape professionals as members of design review panels at both state and local government for developments primarily in and around Perth. We note that the DRP model is starting to take shape in Regional WA with further work needed to respond to local conditions and adapt policy to better accommodate planning governance capabilities from shire to shire. We are finding from the DRP interactions on both sides of the table that the AILA's long-held values and vision for a society, where our communities expect more of their urban areas and are looking for viable solutions to adapt places to become more resilient to climate change and provide innovative ways to protect and enhance culture, green infrastructure, biodiversity and natural amenity.

We are confident our members will continue to provide highly professional and unbiased advice in their appointments by WAPC that is aligned with our professional values as defined by AILA's code of conduct, the Australian Landscape Charter, and our Reflect Reconciliation Action Plan. AILA recognise that some great steps forward have been made in recent years to better address landscape issues in the planning process and our members are proving their value on the State Design Review Panel and on the Capital City Planning Committee. Further



to these appointments we seek to encourage the Commissioner to appoint landscape architects into various sub-committees like the Statutory Planning Committee, the Infrastructure Coordinating Committee, the Infrastructure Steering Group, the Future of Fremantle Committee and the Bunbury Development Committee. This would further help incorporate the knowledge, expertise and experience of landscape architects into multiple facets of the state planning framework.

Collaboration and direction

AILA strongly supports the initiative to reduce duplication in decision-making and centralise referral processes.

An example commonly noted by our members is the inefficiencies involved with referral agencies having the power to undermine carefully balanced planning solutions ascertained through the DRP review process. We have found that referral advice can often be overly prescriptive or focussed on narrowed fields-of-interest in spite the broader planning context, precinct vision and community benefits. AILA supports initiatives to reframe and clarify the WAPC's functions and powers as part of the Action Plan. In the process, we invite WAPC to involve landscape architects internally to help align referrals and inter-agency collaborations to achieve more efficient and aligned outcomes across the entire planning spectrum.

AILA has some reservations regarding initiatives in the Action Plan that could undermine holistic and consistent planning solutions. Some of our members within the design review roles have noted that in recent years, the status of design-led Local Structure Plans appears to be diminishing and that Local Development Plans are becoming more prominent. We believe the precinct-based, design-led, or master-planned approach results in better long-term outcomes that are more contextually integrated. These initiatives are also at a scale that can facilitate transformative decision-making and better integrated and sustainable outcomes. We note that the Action Plan includes an initiative to elevate the status of local planning strategies without providing further details. Before showing any support for this approach the AILA would like to request further clarity on the hierarchy and status of the proposed planning instruments.



Transparency to the community

AILA fully supports actions that will improve the transparency and clarity of the planning process to the community and approvals applicants.

AILA advocates that all planning documents and writing should be clear and understandable to everyone in Western Australia. We understand there are legal terms that must be incorporated into policy, however the way the public access the information is as important as its content and the language used to define it.

In this context, the initiative to require a one-page summary in plain English seems attractive. We do however have some concerns that an overly concise summary can easily lead to more generalised responses that may be more easily 'glossed over', defended, or limited when interrogated during design reviews.

Rather than focussing on a one-page summary, AILA advocates for all planning documents to be easy to understand for everyone. All planning documents should be written in plain English. Documents should be illustrated wherever possible, and examples of 'acceptable' submissions appended to guide applicants in preparing their submissions. Applicants should not need to rely on a plain English summary, only to find later that the planning jargon has undermined their application and caused delays to the process.

Clarity of specific policy details and how it is implemented - the devil is in the detail

Whilst most of the initiatives in the Action Plan seem logical to support on face-value, more detail is required for our members to give the WAPC more-specific feedback and inputs.

One such example is the "targeted reduction on timeframes for lower-risk proposals – more exemptions from planning approval for simple residential proposals." AILA are supportive of this idea in principle, however this policy is dependent on how 'lower-risk' is defined. If for instance 'lower-risk' includes proposals that could lead to clearing of mature trees without proper justification, rationale, or replacement, then such Planning Reform could work against broader policies to retain and protect tree canopy, combat urban heat island effect, reduce water consumption, enhance amenity, etc. As such an otherwise logical and supportable initiative may suddenly become detrimental to the liveability of our urban areas.



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AILA would like to thank the WAPC for the opportunity to comment on the Action Plan for Planning Reform advertised in May 2021. As a group of like-minded individuals, we share a specific set of values and we see this initiative as an important and positive step forward in WA's planning future. We believe the Action Plan has room for further refinements and detail but that it is decidedly moving in the right direction. We provide these comments and proposals for DPLH's consideration in the spirit of an ongoing collaborative relationship. We are supportive of this Planning Reform initiative and welcome any future collaborations and consultation as the process unfolds.

Please feel free to call the undersigned to discuss this and any future advice we can offer in helping to establish a more flexible, convenient and efficient planning framework across all sectors and levels of government in WA.

Kind regards,

A handwritten signature in black ink, appearing to read 'Shea Hatch', with a long horizontal stroke extending to the right.

Shea Hatch

AILA WA President, Registered Landscape Architect

SUBMISSION TEAM

This submission has been prepared by a working group of AILA WA Advocacy members.

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