

## Design WA – A Response to invitation for public comment.-

### Introduction.

It will be immediately obvious to anyone reading the draft documentation, that implementation of the changes depicted in the recent draft 'Design WA' will involve a 'seismic' shift in official Urban development Planning management procedures, policies and associated structures in this State. Any attempt to do so with the present system still in place and unchanged will be wasteful, counterproductive, highly contentious and ultimately futile.

### Immediate applicability in WA ?

While the documentation certainly does embody the most familiar elements of best urban design practice developed over post-second world war decades internationally; in practical terms and in its present form and wording it sadly has very little practical contextual connection with the existing (admittedly outdated and unsophisticated) Planning management system in WA as overseen by the current WA Planning Commission and its sub-agency Department of Planning.

That public service system is currently top-heavy with professional 'Statutory Planning' legal interpretive expertise, but desperately short of fully professionally educated and experienced Registered Architects, Landscape Architects and Social Analysts in the public sector working on high density urban design and planning.

Furthermore, apart from a strong burst of commercial investment in high-density development in the central Perth Region during the 'mining boom,' WA does not yet have either the scale or consistent volume of truly urban development that would yet warrant the full application of the admirably detailed sub-system as described in the Draft.

### Recent local experience.

The main volume of development in the Perth and Peel over the last decade has been peripheral suburban, commercially initiated and funded with almost total absence of comprehensively design-trained professionals operating independently to serve and safeguard community interests. That has left a recent legacy of uncoordinated grossly uneconomic environmentally destructive urban sprawl with over-inflated land values and lamentably few pockets of comprehensively designed, community-sensitive, purpose-designed development.

The State Government must recognise these realities, compliment the team of authors for the thorough internationally researched documentation, but then first address the local availability of relevant professionally skilled resources and then re-configure the deployment of them in a comprehensively re-structured Development Planning System for Western Australia - before commencing implementation of this new initiative.

(Frequent references in the documentation, for example in “Roles and Responsibilities” to Local Government, bearing in mind their actual staffing and capability for the suggested purpose in WA, are quite simply undeliverable at present.)

### Relevant Administrative Response.-

If the State Government, as implied by the current Minister for Planning at the launch of this draft, has a serious intention to implement this worthy initiative, it has no realistic alternative but to simultaneously commit to a comprehensive restructure of the overall urban and regional Planning system in WA.

Restructuring (but without proposed alternative modelling or reference to design standards) has already been stridently called-for recently by all the major operationally participating private and public sector organisations, (each for their different reasons and purposes). This added ‘Design WA’ initiative now makes a contextual initiative essential; and in terms of public service responsibility should not at this time be further evaded.

From a community perspective this Design WA initiative promises enhanced professional creativity and enhanced detailed management of the development process and that seems bound to improve the quality, relevance and human livability of outcomes. The detail of it as currently documented in draft form is however mainly drawn from other countries with larger truly-urban populations and far more sophisticated urban development experience and evolutionary history than in WA, as well as larger Local Authorities that can afford to continuously employ design-trained professionals in urban design.

(In terms of Government Policy consistency in the Planning field, there is today some obvious muddled overlapping and clash of both content and intention with other but currently incomplete draft WAPC policies such as Perth and Peel @3.5 million (mid-2015) and the Green ‘Growth’ Plan (early 2016), that now appear to be in conflict with, or partially overtaken by this more clearly detailed ‘Design WA’ initiative.)

### Supporting Analysis.-

The following detailed ‘Functional Review’ Paper incorporated here as part of this response to ‘Design WA’ was first drafted in 2015 and is based on extensive first-hand local observational research into the existing role and function of WA Local Authorities in Planning. It is directly relevant to this Design WA initiative, not only because it explains why this Design WA initiative is currently undeliverable, but because it is at local level that all development intentions actually translate into reality.

This Review as updated below includes both factual explanations of the existing system in WA and proposals that should be seriously considered to commence relevant change.-

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An Independent Functional Review of the land-use, urban design and development Planning System in Western Australia with particular reference to practical issues of enhancement and the role of Local Authorities.-

EXECUTIVE SUMMARY:

A major functional re-evaluation of the overall Planning Process and outcomes measured against the future challenges of growth and the massive social impact of rapid technological evolution is unavoidable. It is now abundantly obvious that the present system in totality is not even being managed to produce acceptable community outcomes today, let alone in the future.

Judged by recent outcomes, the existing WAPC and Department of Planning together have demonstrated failed to manage and embrace the essential elements of urban design, while also knowing that commercial developers can have, by virtue of their business model, no reliable commitment to engage in socially responsible research or to produce timely, balanced and comprehensively designed and planned development. Also being aware that Local Authorities in WA, as an 'end point' delivery decision-making 'gateway,' are at present inappropriately structured and professionally staffed to adequately contribute.

A form of fundamental Re-structuring of the Land-use Planning and Development management System in Western Australia is suggested. That includes proposals to change the range of functions of the present Planning Commission and to rename that as a 'State Infrastructure Planning Commission' and an extensively restructured and re-staffed 'Department of Urban Design Planning and Development' that should include direct involvement in leading and coordinating professional urban design delivery and standards in WA.

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## Responding to the challenge of rapid change-

The State is today confronting massive change in social living circumstances with advancing technology affecting every aspect of life, as well as forecast substantial increase in urban population.

Those changes are having dramatic effects on both social and services infrastructure and alter the nature of supply in many unforeseeable ways. They demand a far more innovative, flexible, responsive and professional urban design, planning management and delivery system across the public sector than WA has been familiar with.

Nowhere is this more crucial than in urban land-use and the creation of relevant future living environments for people, that will be increasingly variable in both technically feasible function, and form.

That creation has hitherto been managed in WA for small slowly-changing urban areas, through elaborate bureaucratic controls by a Statutory Planning system headed by a Planning Commission (WAPC) executively supported by a Department of Planning (DoP).

However, that model for a wide variety of reasons is now outdated, and will not in future be appropriate to either the accelerating pace, widening dynamics of demand or feasible quality of outcomes.

Conceptual and practical realisation of creatively designed urban development at International City scale is now a complex professional team-activity that must also involve interactive participation with the client-users. Relevance, innovation and quality of outcomes simply cannot be achieved or assured by didactic remote-control disconnected from people and development delivery systems, by formal statute- yet that is inherently characteristic of the present planning system.-

Communities must be developed, strengthened, and creative visions negotiated into built-reality to provide essential local social identity and stability for people – who are now living frenetically complex lives in a combined multi-resourced physical and often psychologically ‘virtual’ environment.

### Critical overview of the current WA system in operation.-

The core problems that must be addressed include -

Extensive evidence of failure to accord primacy in strategic thinking to the People being planned-for; to comprehend the rapidly changing forces impinging upon their individual and family lives; and the seriously out-of-date structures in the State that compromise the means used to create and deliver relevant development that will meet their various needs.-

The existing system overall is in practice at present, functionally disconnected from both the social and sites locational realities that an effective Planning system should be regarding as its fundamental priorities.

At this time in the 21<sup>st</sup> Century, forward planning at least of the Perth and Peel City Region subject to substantial population increase; with such an already functionally inadequate Planning system warrants much more than ‘adjustment’ by those directly involved in the operation of it.

The simplistic dependence on an old and traditional statutory administrative structure for delivery and supervision of land-use Planning must be urgently re-evaluated. It was constructed in a former era where ‘authority’ was unquestioned, social change was gradual and the dimensions of

population concentration very different to today. Notwithstanding obvious recent functional management failures by the existing system; the rate of change is now accelerating with global scientific and associated technological capability being rapidly infused into every aspect of daily living.

Personal and collective investment in built-environment has also risen and expectations of both design quality and choice in surrounding living environment rising to an extent never before witnessed in Australia. It is therefore inevitable that the forward planning systems that should provide essential purpose-designed frameworks for living must be both relevant and much more dynamically flexible to meet those challenges.

No other Agency than the Planning Commission with the Department of Planning, as functional managers and overall service-providers as part of the Public Service, is currently available and accountable to the taxpayer - and the State Government representing the overall community is in general responsible for the outcomes of those Services.

Incredibly, for a local rapidly growing community that appears to imagine itself today to be moving ahead creatively, land-use planning and urban development are in serious crisis. Both the WA Planning Commission and Department of Planning that currently operate together, are in fact completely detached operationally from the actual process of engaging in creative design and planning - where it is actually delivered to manage and produce relevant future outcomes.

That detachment, has been a deliberate choice of WAPC/DoP and it has failed- for at least a decade, with no means of interactive practical involvement in the detailed processes of development. Thus leaving them isolated only in a theoretical 'instructional' domain relying upon an overelaborate and costly statutory bureaucracy trying vainly to sustain an 'appearance' of facilitation and remote control.- By naively expecting Local Authorities who do not have relevant professional expertise to be responsible for design guidance and approvals.

There is ample available visible proof throughout the Perth Region (*that has been allowed to sprawl into Peel Estuarine Region and beyond*), that this combined WAPC/DoP Unit has failed abysmally to produce wise and timely outcomes in almost every aspect of land-use Planning, despite frequent publication of costly 'ex cathedra' theoretical documentation. That is essentially because it has afforded no attention to actually managing how and by whom those theoretical constructs can and will be implemented. That documentation has been converted to become elaborate statutory 'determinations', but is failing because it is widely known to be functionally disconnected from the practical realities of delivering well-designed outcomes.

In summary the system and management of it, as operating today and preparing for the future is neither efficient, fully relevant, appropriately flexible, nor cost-effective for the community in its present form.

Urban Land-use Planning is characteristically a formative futures-determinant with massive qualitative living implications in its outcomes, as well as quantitative financial investment implications for all of the community, that will define our future in WA.

## Elements of the current Planning System in operation.-

The broad principle underlying the formal Planning Act and the chain of 'oversight' by WAPC is founded on an assumption that the core purpose of WAPC with a State-wide remit, is to forecast and advise on the location, efficient and timely construction of relevant major infrastructure likely to be required as a framework for future built environment of all types - industrial, commercial, residential and recreational. Furthermore, it has been believed that planning the location and advising on public expenditure of all of those (mainly for the convenience of Government oversight?) needs to be centralised and elaborate Statutory procedures necessary in order to fairly administer and balance the competing interests of people and developers as land-owners, concerning –where development occurs.

However, the 16 person 'Planning Commission' mainly comprises Chief Executives of other State Public Service Government Agencies with an executive research arm the 'Department of Planning', has in recent years extended the 'infrastructure' planning remit way beyond that.- Even endeavouring to determine by Regulation in detail the actual forms of urban development, (in a remote desk-researched view), suited to particular purposes at the local realisation level. That has been by means of copious theoretical guideline documentation, but deliberately produced at 'arms-length' from practical engagement in the professional processes of creative urban design and development; and without any direct functional managerial connection to provide a means to ensure quality-control of the planned outcomes.

That 'distancing' itself specifically prevents the operation of a functional on-going 'feedback-back loop' to ensure practical viability and conceptual up-dating. Other than State Parliament, there is no provision, either during development or post-completion, for outcome results or managerial efficiency of the system overall, that extends outside the State Public Service, to be continuously monitored and evaluated independently.

The inevitable result is that as the population of the State has recently grown rapidly, and the range of possible urban development designed forms become subject to rapid evolution, controlled by WAPC/DoP as currently structured, is now demonstrably beyond its practical capability. Furthermore, extra cost is being borne by the community for extended bureaucracy of dubious practical utility, simply to try to maintain 'control' that from the resulting visible outcomes, has proved to be largely futile.

*(Incidentally the Environmental Protection Authority (EPA ) in WA has a parallel function regarding planning of natural environment protection that should be, but has not been, integral to forward evolutionary urban Planning.- While the EPA have 'technically' had an opportunity to 'comment;' at Local Plan level, but without resources allocated to investigate likely impacts; natural environment has not been accorded other than token reference in urban development planning.- As EPA has recently observed in strident critical terms.)*

Concerning residential area development - with associated servicing.- Planning of this affects the whole community as it is actually deciding the form and functioning of their future local living environments. The community has tolerated the obviously sub-standard outcome results with increasing frustration, indeed often in desperation being obliged to engage in quasi-legal procedures to be even heard. That is largely due to the obvious gap between theoretical 'guidelines' enshrined

in an intricate web of excessive statutory bureaucratic procedures; and the realities of actual development - that should, but is not being, managed to be both situationally and socially 'engaged' at local level to ensure actual relevance.

Local Government Authorities have been expected by WAPC to be 'somehow' responsible for local supervision and delivery of development planning outcomes in terms of multiple building assemblies and sites relevance, but are in fact technically 'advisory' only to WAPC yet with no formal systematic line of actual functional managerial responsibility to and from them, through which worthwhile accountability could be assured.

In fact, most Local Authorities neither have the appropriate means, professional staffing or organisational structures suited to those purposes in respect of urban design and land-use planning. (*Discussed in more detail later in this paper.*)

This comprehensive detachment then leaves the actual professional work of realising creative urban development planning (of multiple building outcomes) entirely to chance, vulnerable and dependent upon the vagaries of commercial land developers - whose business is short-term profitability, and not accountability to the community for the overall quality of district neighbourhood outcomes.

(It must be noted that while commercial developers do promotional 'marketing' research for their preferred products, that is altogether different to independent and continuous social needs-research that is an essential function of contemporary creative development planning.)

The local part of the Planning System then in its present form, is therefore also failing overt accountability as an effective service to the community. (The evidence of this disconnection is manifestly visible to anyone throughout the sprawling range of suburban ad hoc, poorly designed, planned and serviced neighbourhoods in the Perth and Peel Region.)

Relevant outcomes of contemporary urban development should demonstrate that the following essential matters to have been researched and taken fully into account -

- 1). Specific characteristics of actual sites, location and the potential community value of all site features and limitations of them.
- 2). Local detail on the changing and widening variety of local social needs of the community clientele across all age groups and having regard for their personal capabilities and resources.
- 3). The current and potentially evolving technology of designed and built form.
- 4). Timely and convenient availability of essential local living infrastructure services of all kinds that the community requires from both government and commercial sources.

*(Creative professional futures-urban planning, to be implemented at a local level furthermore cannot be simply the disaggregation of broad nationally and historically-derived research and data.)  
Because it vitally involves at least.-*



- 5). Detailed enquiry and investigation regarding relevant sub-regional characteristics and associated potential opportunity for new local employment enterprise. (Such as Tourism.)
- 6). Critical and creative assessment and interpretation of local context - both physical and social values.
- 7). Conceptualisation of alternative projections on outcomes.
- 8). Multi-dimensional illustration by way of communicating concepts to stakeholders.
- 9). Recommending on balance of alternative options.
- 10). Community engagement throughout the above.

Many Local Authorities as currently structured, cannot fully engage with this basic level of detail for practical creative design and Land-use Planning. Most don't have the staffing resources or structures to objectively record and appraise site assets within their jurisdiction or engage adequately with their communities in all socio-economic categories. Local Planning 'Schemes' that each Local Authority is required by WAPC to produce to supposedly extend their theoretical Metropolitan Regional 'Scheme' effectively to locally applicable level, (for the same reasons) fail to extend the ideological vision to local realities. –

Yet the above are all essential to underpin, develop and create timely and relevant and well-designed Development. Consequently many Local Authorities probably should not be burdened with responsibilities for Land-use Development Planning at all –unless henceforth the nature of their involvement is fundamentally changed.

On the credit side, the existing Planning Commission does have some future inter-agency infrastructure services planning connection but with (*only*) 4) above (i.e. through the Senior Executives of most, but not all, of the State-wide infrastructure-providing Agencies, comprising the membership of that 16 person Commission). But vitally, neither the Commission or the DoP have any direct visibility of the other essential components above; and most importantly neither do the Local Authorities that by some 'remote chance' might? partly legitimise outcomes .

In the foreseeable future context then, from an informed Community 'consumer' perspective - drastic functional revision is now essential to purposefully alter the management of roles and responsibilities in WA for actual urban design Planning policy and delivery – (at least to ensure accountability throughout the process from broad intentions to local realisation in built-form) but hopefully very much more than that.

The Planning System in WA then at present has no proven practical functional validity at local level.-

The system overall is simply out of date conceptually, elements of it are dysfunctional, their actual contribution misunderstood and above all certainly not operating in the balanced public interest. If this continues without major re-structuring, the State will be surrendering any chance of producing relevant and suitable living conditions for a Perth and Peel Region population now forecast to be rising to 3.5 million by 2050.

It is not only the expected high rate of population growth that must be planned-for. Future liveable City Regions of international standard require multi-disciplinary Teams of Professional Urban Designers to be continually hard at work with creativity, innovation, flexibility, to be socially-responsive, techno-savvy and above all with a timely response to rapidly changing and evolving future human needs unforeseen in previous generations; but the present WA Planning System itself is now functionally in remote top-heavy bureaucratic over-reach and a major hindrance.

*Furthermore, no extension of theoretical statutory obligation placed on commercial land developers will resolve the qualitative design and planning issues vital to urban development. With the present planning management system, they are able to acquire land opportunistically, (aided by premature zoning by WAPC) to subdivide with minimally relevant Local Structure Plans, sell off blocks and depart – importantly with no formal obligation or on-going accountability whatsoever for the resultant community outcomes. They will quite naturally, always find ways to escape on-going community accountability and greater latitude to increase profitability, because that is the natural core purpose of their business model.*

The necessary intensely detailed collaborative professional multi-disciplinary on-ground research and comprehension that creates innovative development solutions is not evident within, or being positively supported anywhere in the existing Planning system. At present that is in- essence 'screened-out' of the WA Planning System by excessive theoretical 'didactic authoritative determinism' from the excessively centralised and over-regulated statutory decision-making structure, managed and operated by the WAPC / Department of Planning.

Despite the 'apparent' sophistication of copious theoretical guideline publications, the System is in reality out-of-touch and has become practically disconnected from what designing and planning future living spaces and conditions for people in the 21<sup>st</sup> century should really be about.

In summary this failure of the Planning System to continuously adjust with appropriate foresight to the contemporary escalating rate of change in every aspect of life in the State is further testimony to the immediate need for urgent overhaul.

### Some recent features of this 'planning' system.-

The WAPC itself has for most of the last decade demonstrated continuously 'groping' for conceptual purpose for the Perth Region with different notional urban development planning models ('Connected City', 'Linear City,' 'Network City' etc.) These have been incorporated into a range of prominently publicised, supposedly directional framework papers. However, for the most part those have been more idealistic than practical and therefore mentioned more by token reference in print by potential developers, than followed or usefully implemented.–

Each has been broadly sensible but theoretical constructs said to 'inform' the rest of the system. But also repeatedly exposing central systematic failure to comprehend the on-ground reality to which these were meant to relate). In fact failing to 'inform itself first' about the practical implications at operational level (for example 'Directions 2031' and Beyond' that delineated zoning but has failed to contain needless urban sprawl.)

Recently, in 2013 a State Planning Strategy 2050 (pub.2014) when in draft was extensively explored in a large collaborative cross-sectoral (mainly Government Agency) stakeholder Forum hosted by WAPC. Lively discussions amongst the (140) participants quickly drifted away from macro state-wide infrastructure issues and revealed many relevant near-view problematic design and planning concerns (initiated freely by the participants recorded on the day) but with most of those given only token reference in the final document. The '2050 vision' timeframe was obviously already then too far distant, indeed the participants were (inevitably) discussing issues of far more immediate concern, indeed foreseen largely in a 2020 context.

*(Multi- Agency and 'stakeholder' liaison Forums of that type should probably be regular events at all levels in Western Australia and, if heeded could do a great deal to enhance the quality and relevance of future development.)*

The latest 'framework' attempt concentrates on 'Perth and Peel @3.5 million 2050' in the metropolitan city Region. Notably, the draft once again unrealistically refers under a heading "Making it happen implementation strategies" 'actions, by whom' - listed as - to "WAPC/Planning, State and Local Government". Still apparently in complete denial of that latter relationship being outdated, dysfunctional, failing and a primary structural planning management issue that must first be confronted to enable any urban planning relevant to future conditions to emerge.

Also the recent further re-issue in draft of a more voluminous (141 page) theoretical 'Liveable Neighbourhoods' document, sensible though it is in parts, is a further example of overelaborate theoretical, but detached attempted micro-management supposed to produce good design and planned outcomes by enforcing adoption by Regulatory 'remote control' (presumably in the assumed absence of intelligent, creative and innovative professional urban designers?) – Perhaps this is seen by WAPC as a means to 'teach' commercial developers with desk-researched theory how to go about neighbourhood design and local planning!

That voluminous document as it stood in draft form, is conceptually too limited as it is clearly not written with an understanding of professional creativity in three-dimensional spatial configuration design form and does not discuss the vital the importance of on-going social change and how social research is an essential part of planning community development. Professional neighbourhood design can however do a great deal to beneficially alter anti-social values (that often develop amongst young people in sprawling socially disconnected environments). Indeed sadly once again typical of WAPC/DoP current theoretical detached strategic thinking about what and who Local Community Planning is actually for.

Well-designed genuine 'liveable' neighbourhoods evolve from thorough community research, and intergenerational engagement – to create positive local identity and community 'ownership' that in future should be planned as 'integrated' community neighbourhoods.

Future integrated liveable neighbourhoods, whether inner or outer suburban, or high-density central localities, should in future be professionally 'master-planned' as 'comprehensive development areas' or precincts where a high proportion of residential provision is intended.- Embracing a cross section and choices of community age provision and include all essential convenience services, social facilities, both indoors and outdoors, (as well as shared remote working 'tele-workspaces' that are becoming increasingly normal for a rising proportion of working people).

It must also be noted that future neighbourhoods (that will be where numerically most residents of a large City Region will live and also partly work), are becoming far too complex to be planned without the full engagement of a comprehensive professional design Team.

*(The current WAPC planning system neighbourhood development model that involves detached 'preaching' direct to 'short-term buy land, sub-divide and sell off blocks- commercial developers' is now well past its 'use-by date.')*

### Disjointed System Structure and Cost to the Community.-

The present structure puts the existing Planning Commission in a position to control and be serviced by a Department of Planning. That Department itself is however at present only advisory executive support to the WAPC and has no independent public visibility and no direct delivery responsibilities, yet in turn it drafts theoretical 'rules' for Local Planning, for authorisation by the 'Commission.' But as noted above, most importantly without either body having the essential continuing direct exposure to comprehend any of the social or site conditions to which actual development is expected respond, or having continuing executive linkage with agencies that might have that responsibility.

Therefore this centralised system of Commission and Planning Department together are clearly in functional 'over-reach' beyond a reasonable level of practical cost-benefit accountability to the community. That over-reach is 'disguised' by an elaborate and self-perpetuating Statutory network (with the legal authority of Parliament) that is now in practical terms really a wasteful unproductive extension of (costly) Public Service bureaucracy.

The overall community-cost of it is not only a direct impost of dubious value on State Treasury (i.e. public funds) through personnel as currently deployed, but even more so by indirect impost on the community for the continuing poor outcomes that are not based on, or executively linked with, intelligent and constantly updated local social research. Also by the excessive procedural bureaucratic elaboration, that in turn generates much more of that at local community level as well as frequently inducing voluminous and costly Appeals and litigation.

There is an entirely unjustified presumption that the WAPC with DoP having developed elaborate theoretical strategies, frameworks and guidelines; can leave Local Authorities to implement them and can then simply (without engaging at all with the real work of creative planning) run a desk-based 'compliance check' of their decisions on paper and – 'job done'! That is of a course a complete fallacy. (Relevant facts of Local Authority operation are detailed below).

Not only is this a denial of what real creative multi-disciplinary teamwork urban design and rural Planning is actually about, but ignores the rate of change and innovation to which those must be responsive. That simply cannot be 'frozen' into an unwieldy Metropolitan Regional Scheme (MRS) prescribed by remote control that the current system depends upon.

Broad or 'macro' contextual frameworks are of course necessary but at present are being extended to extremes by attempted theoretical micro-management supported by Regulations. Plus beyond them, the actual mechanics of operational delivery are ad hoc and altogether devoid of quality-assurance. (The local LPS theoretical sub-sets of that theoretical MRS, have very little actual local

community exposure, relevance or currency, and inevitably require (costly) procedural updating even to have any deliverable local relevance at all.

Measured in open Community view today by the visible evidence of supposedly 'planned' outcomes such as -

- \* sprawling and wasteful land-use;
- \* failure to produce socially integrated new neighbourhoods;
- \* chaotically designed settlements comprising buildings of almost any form anywhere;
- \* poor district servicing in new developments;
- \* failure to plan for adequate supply of affordable housing and aged-person services;
- \* extended and inefficient transportation networks;
- \* failure to plan for adequate recreational parks and community sports facilities;
- \* widespread destruction of unique biodiversity..... etc.

The overall results are with few exceptions, failing abysmally to deliver creatively designed and cost effective planning at local level for the community by this systematic 'remote-control.' – To the extent it even appears as though serving the actual needs of people is not the purpose of Planning in WA ?

Furthermore the overall process within the System as it currently exists, also actually drives up the cost of land to the community.-

A). By premature signaling to would-be entrepreneurial developers, land-use proposals depicted as zoning on theoretical 2 dimensional mapping, based only on empirical supposition from afar and not on practical local research.

B). By naively proclaiming firmly prescribed 'zoning' in Metropolitan Regional and Local Schemes before the land and proposed social context so affected has actually been appraised, surveyed or assessed for any purpose.

C). By 'Schemes' later always requiring expensive bureaucratic and time-wasting procedures to alter to fit actual local conditions – that should obviously have been identified before any zoning was set down.

### Continuing Failure of System Management overall to Communicate, respond and interact with Community.-

Headlines in WA media such as *"Suburban Spread biggest Problem"* - *"Sprawl that swamped a City"* and *"Planning needs Transparency"* - *"Shift in thinking needed to cope with city's growth"* - *"Sprawl strangling Perth's environment"* go unanswered as though the WAPC/DoP doesn't see itself as responsible – whereas of course it absolutely is, and has been.- Particularly as it has chosen to be so centrally deterministic in its management of development.

Then there are Local Authorities who have been implicitly but inappropriately relied- upon by the WAPC bearing in mind their structure and limited resources; to be the link between theoretical planning and the community. If that had been working well, why would we see other headlines such

as “*Local government must be more transparent*”? Such open public discussion of the obvious, is further testimony to community dissatisfaction with the results of the present Planning System.

Current interaction with the community by Local Authorities on planning issues is actually minimal and methods usually shallow, out-of-date and giving the appearance of only being done for ‘administrative convenience’ as directed by WAPC i.e. - Typically only ‘inviting public comment’ usually by newspaper adverts in the ‘public notices’ columns – (that few people read today). *Without for example, an extensive range of informative and genuine interactive local forums, to discuss local research findings-and development proposals.*

Written public responses are in fact usually precis-ed (selectively) by the same staff who produced the documentation, rather than independently. Then without that input being professionally analysed in unbiased detail and various opinions shared, to be further discussed by the public – decisions are made that inevitably leave the public disgusted by absolutely minimal genuine ‘engagement’.

### Role of the Environmental Protection Authority. (EPA)

The EPA in WA has a parallel role regarding natural environment protection that should have been much more specifically addressed in development Planning, but has been seriously inhibited due to future community value of natural environment not being given adequate practical emphasis - (with recently highlighted detrimental results that will have long term consequences).

Reference to conservation of natural environment – for instance even for local microclimatic modification and recreational value, quite apart from our regional world-class recognition as a unique biodiversity ‘hot-spot’ is minimal. Such deliberate squandering of a free resource has mainly been ‘notionally’ mentioned in the theoretical documents issued by the WAPC (e.g. Directions 2031) – but with inclusion only in unspecific generalities and no serious practical attempt made to relate to either regional or local development implications.

Although the EPA (with its executive Department of Environment) has been heavily committed in providing advice on large-scale industrial developments and processes, it has had a continuing statutory role in advising and commenting on Planning developments that impact upon the natural environment. But importantly has had very severe limitations in professional resource-availability from its executive Environment Department to investigate or verify the actual environment of sites proposed for development. (The EPA role at State level is complementary to the long standing responsibility of the Commonwealth Government Department of Environment that has a national overview; and makes international commitments with regard to natural wild-life species, habitat and environmental conservation; principally through Environmental Protection and Biodiversity Conservation (EPBC) legislation.)

Recently (Ref. the SAPP) Commonwealth Government has proposed to transfer part of that role relating to local Development Planning within States, to the States themselves. Their stated objective is to reduce duplication and simplify Development planning approval procedures.

However, that has caused the EPA to in turn express great concern, documented in their recent 'Strategic Advice' to the Government; about the planning of urban development in WA - having had a devastating effect, in fact permanent obliteration of large areas of unique and internationally recognised heritage biodiversity that has existed in and around the Perth and Peel region.

That concern, echoed today throughout the community, was raised very specifically by the EPA, being specifically critical recently about uncontained urban sprawl!. That sprawl has occurred and is still continuing under the supposed control of WAPC, and at a time when open space of all kinds, even sports playing fields and invaluable recreational parkland are in short supply. Biodiverse land areas are being lost by large scale indiscriminate bulldozing clearance at a prodigious rate through lamentably poor forward planning managed by WAPC.

Two salient points arise from the above.-

Firstly; that the recent EPA advice is further and independent official confirmation that the Planning System is in crisis regarding negative but avoidable environmental impact, resulting from the current management of development.

Secondly; that unless that management of Planning is changed, the EPA in WA would be most unwise (as initially suggested by the Commonwealth ref. SAPP ), to trust the existing Planning system to allow any omnibus permission to be given to Developers (via Local Authorities). The planning procedures prescribed and operational planning responsibilities as currently managed by the WAPC, unless changed, will certainly extend and worsen the (avoidable) loss of natural environment that is roundly condemned by EPA.

### The Current 'presumed' Role and Functions of Local Authorities in development Planning?

So far in the foregoing we have mainly addressed dysfunctionality of the system at Commission and Department levels, particularly to manage the actual process of creative Planning.- Where else then does the actual process of creative planning occur that the community could rely on to be acting in the genuine public interest? As noted

above, there appears to be a long-standing presumption on the part of the Commission (and perhaps Government) that it can and should occur at Local Authority level?

However - that capability is an entirely false and misleading presumption - as detailed below. Few Local Authorities are appropriately staffed professionally to engage in actual creative operational urban design and planning, indeed most make no attempt to do so. (Yet direct accountability to the public for what is delivered can go no further, since beyond them to commercial developers there is no electoral accountability whatsoever.)

Taking that apparently 'presumed' WAPC view at face value, Suburban Local Authorities by way of example would then have been responsible for the: -

Excessive urban sprawl;

Inconvenient lengthy and economically wasteful transportation systems connecting homes and work;

Grossly wasteful and anti-social residential 'ribbon development' extending along major traffic routes through rural landscapes without forward-planned adequately serviced 'nodal' residential neighbourhood network structures;

Absence of comprehensive design to provide timely, socially responsible residential planning and foster inclusive inter-generationally supported neighbourhoods;

Poor time sequence-planning to guarantee essential local services appropriate to need by families as residential areas are developed;

Insufficient provision of both formal and informal outdoor recreational space, public parks, and retain established shade trees;

Thoughtless and avoidable destruction of high-future economic and social value natural biodiversity (in a Region internationally renowned for concentrated unique biodiversity!);

Residential housing development being condoned in mosquito infested saline swampland;

Failure to plan for the already proven reduction in regional annual rainfall, to guard against damaging pollution of waterways and protect against encroaching marine and terrestrial salinity;

Visually chaotic urban areas lacking in both conceptually designed spatial linkages and local social neighbourhood identity; and related -

Failure to ensure the appropriate employment of available creative and innovative professional skills locally in urban design.

Inner suburban areas being plagued by ad hoc infill, predominantly on disconnected gap- sites issuing directly onto busy trafficked streets; and without adequate attention to interlinked properly serviced and sustainable social neighbourhood development.

Continuing spatial dominance of traditional vehicular transportation systems in urban areas when better forward planning could have progressively resulted in creating a safer distinct pedestrian 'realm' with people-friendly spatial separation.

(-All those combined negative outcomes are easily visible today in outer suburban and many inner suburban localities of the Perth and Peel region.) -

However, let us then explore whether the above WAPC presumption about Local Authorities is actually fair and reasonable, or simply unrealistic and actually an overall System management failure by WAPC/DoP themselves ?.....

As local populations have grown and the intensity of demand on services increased, particularly over the last decade, increasing work-load and expectations have been placed on Local Authorities, but their structure and organisation have not altered. Those in relation to Planning have however become increasingly complex and now lack an extensive range of applied local research, multi-professional insight, skill and management effort than most are capable of providing.



The WAPC/DoP have apparently tried, unsuccessfully to counter that shortfall at Local Authority level, by issuing more and more theoretical 'guideline' directives, but overlooking the fact that those are generalised and can neither be site-specific or compatible with local social circumstances.

Apparently still unimpressed with the outcome, instead of tackling the issue at the client interface with the community, the WAPC/DoP has introduced an intermediate layer – over Local Authorities, of small independent expert Development Assessment Panels (DAPs) to reassess decisions made by Local Authority Councils.

But ironically those Panels of course ALSO have very limited or more likely non-existent local site and social context knowledge to which the development proposals relate! – (Commercial Developers naturally applaud these DAPs, because they feel they are likely to be less restricted by detached independent scrutiny of their proposals concerning social and sites relevance, genuine design creativity and timely involvement in the full comprehensive planning and construction for example of new neighbourhoods.) - but the community are obviously still the losers.

Once again the system fails to deliver relevant outcomes that the community is entitled to expect because the existing WAPC/DoP system overall for which they are managerially accountable, although a heavy impost on the public purse, is not managed properly through to creating sensible outcomes.

Questions:

*a) In view of the urgent need for a much more rapidly-responsive, innovative and creative planning intervention being needed, should Local Authorities be involved in planning at all?  
If so in what ways, and how can that involvement be properly managed, and by whom?*

*b) Where could the on-going local (professional) community development research and liaison missing at present be secured, and where could actual socially responsible creative design and planning be done by others who would carry accountability for it - with communities not left to the unaccountable vagaries of the commercial development industry?*

Importantly it must be accepted that professional design and urban planning is realistically 'alien' to the primary purposes and modus-operandi of Local Authorities. Their structure, managerial procedures and operational methods (under 'Standing Orders') were devised for quite different purposes, determined by the State Department of Local Government, (that is not engaged at all in urban design or Land-use planning). They are organisationally structured for the supply and efficient management of Local Services being directly and continuously provided in their various districts, and those have little if any commonality with the designed creation of environments for future living.

Therefore the hitherto implicit presumption by WAPC - that the complex creative processes involved in configuring future living environments, and optimum land-use in a dynamic and rapidly changing social context can simply be 'tacked-on' to the much simpler services-provision role of Local Authorities, is now and for the future quite simply unreal and unsustainable .

Consider for instance -The 'actual' operational methods and procedures of Local Authorities.-

They each have an Executive Team that manages local services organisation, financing, provision and staffing for various local operations. Plus (and similar in function to a comparable size private-enterprise Company) that executive team has a non-executive Board that has an overall policy determining role. That 'Board' called a Council, is comprised of lay-persons (usually 'Mums and Dads' with social interests) elected, (normally for a 4 year term) from the various districts within land boundaries defined in convenient size and configuration for provision of Local Services. Those mainly involve - management and maintenance of immediately available services - that include Lighting, Public parks and gardens, Sport and Recreational facilities, Refuse disposal, and Building control (*the latter not requiring creativity, largely involves application of current best-practices prescribed under nationally agreed Codes of Practice*).

Financially: Local Authorities apply the money they raise through local Council Rates and taxes in configuring, administering and paying for those direct services, for the most part with efficient management procedures operated by an Executive Team headed by a CEO. The expenditure of those funds, also as mentioned above, is overseen and voted on by Councilors.

Operationally: The elected Local Authority Councilors, meet in full collective session monthly and with functional Sub-Committees of Councilors, having previously met with – (in attendance) the Chief Executive and with only those senior executives with relevant functional responsibilities. Those Committees are provided with regular expenditure and policy progress reports and any recommendations that affect operational outcomes or overall policy.

Councilors meeting in the function-specific Sub-Committees (often in number around 50% - 80% of the full Council) will have received those reports and under the strictly regulated formal procedures, vote on them, with brief discussion only occurring if a Councilor raises an alternative motion to the recommendation proposed on paper by the executive officers. Those resolutions are then in turn forwarded to the monthly full Council meetings, for ratification – and often simply adopted by vote 'en bloc' with no discussion at all).

Members of the public can view the written reports incorporated into Agenda that are to be considered at both Committee and full Council meetings, (made available on-line 48 business hours ahead of those meetings). Each Committee and Council meeting has provision for members of the public to ask questions related to the Agenda, also on prior request - to request to speak in time-limited (5 to 15 min.) 'Delegation' regarding specific agenda items. In the latter case, at the discretion of the Presiding Member, Councilors are permitted to ask questions of the 'delegates,' but not engage in any discussion with them.

All of the above procedures and practices are strictly determined by the Department of Local Government under 'Standing Orders'. (That Department also has guidelines relating to collective 'community engagement' by Councilors but those leave considerable discretion as to how frequently, and in what form that interaction occurs). Note this type of meetings formality actually prohibits Councilors engaging in open discussion; and that often leaves the public who take the trouble to attend and observe how decisions are taken, frequently dissatisfied with the process.

Current Involvement of Local Authorities with Development Planning.-

Face to face community ‘referencing’ by Councilors on Planning matters, no doubt partly because they feel uncomfortable to openly discuss them, is minimal. – Because of the ambiguity they find themselves in, on the one hand feeling they should be in dialogue with community on their views, and on the other that they will likely have to vote to accept or otherwise Officer Recommendations (usually based primarily on what WAPC statutory directives say), is a serious disincentive. Listening to public opinion without making comment is a difficult dilemma that most will prefer to avoid, yet they are usually expected by electors in their own Wards to have an essentially near-view parochial and defensive rather than broadly creative futures role.

In the special case of land-use forward Planning, the Executive in most Local Authorities (though not all) has a small team of Planning officers whose role (most important to note) is essentially procedural Statutory Planning Control and they are advisory to both the Council and to prospective land developers -(interpreting WAPC policies and guidelines). Importantly, they are not expected to be professionally involved in sites appraisal, local social enquiry and community research, or ‘hands-on’ creative urban design aspects of development planning (and typically do not have such professional expertise.

The advice these ‘Planning Officers’ convey is strictly in accordance with standard procedures and Guidelines that are determined by the State Department of Planning (DoP) whose operations are overseen by a Planning Commission (WAPC).

As noted above, the Planning officers in local Authority executive teams are engaged then, in Planning Control – interpreting and advising on generalised determinations by the WAPC. Written ‘Public comment’ is formally sought on development proposals only by advertising and those Statutory Planning Control officers provide a precis of those, along with recommendations - that are invariably based on the remote (theoretically derived) WAPC policies and directives.

Those officers also compile Local Planning Schemes (LPS) (2 dimensional flat plan diagrammatic depictions with text.) as a means of translating WAPC directives implicit in the MRS into local zoning for various purposes. – BUT apart from precis of written public comment, occasionally sought, they do not engage in either detailed sites assessment, or live on-going social research, and very rarely engage at all with the people or communities being planned-for. Except (only) a few L/As do hold occasional community workshops to test public reaction to Local Planning Schemes; - or Structure Plans (sometimes known as ‘Outline Development Plans’) usually when proposed by private sector developers, and POs again advise them on WAPC policy implications.

Going further into the matter of ‘engagement’ with the public – a majority of elected lay-Councilors naturally do not, or cannot, fully engage with the complex essence of practical Land-use Planning and urban design,(e.g. the detail of local sites and dynamically changing social needs) and most feel they are insufficiently knowledgeable to do more than apply basic logic when Executive officers place recommendations based on WAPC criteria and brief synoptic summaries of ‘public comment’ before them for decision ( to recommend approval, or otherwise to WAPC).

While it might be presumed then by WAPC that Local Planning Schemes may provide a link with WAPC policies, in fact as outlined above, they usually don’t translate into either the detail of local sites or social context but therefore simply perpetuate combined relative ignorance. (Note also the

community cannot really engage at all with Local Planning Schemes due to their simplified graphical presentation, and detailed on-site implications are not explained).

Therefore the conventional assumption by WAPC (and perhaps Government Politicians) that because Councilors are locally elected they will be fully cognizant of local community needs - is obviously incorrect in respect of planning the designed creation of future socially and economically appropriate environments for living, and both a false and naïve assumption.

Furthermore the Executive (planning) officers that underpin those Councils 'might have been?' expected by WAPC to engage in actual creative design and land-use local plan evolution, but the majority certainly do not.

If they were to do that, Local Authorities would have to employ and manage much larger numbers of professional people engaged directly in development plan evolution. For instance to -

- a) Have the means to research and professionally engage adequately and continuously with the community in all socio-economic categories.
- b) Determine broad future local infrastructure requirements at district level;
- c) Critically appraise all potential development site assets, including natural assets;
- c) Select and propose relevant locations for different potential activity-areas at site level, and
- d) Have extensive experience and design capability to create comprehensive, practically and visually appropriate comprehensive neighbourhood urban development concepts for relevant future social living-environment provision in their districts.

### Local Authority Contribution to Development Planning, in Summary.-

Most Local Authority executive teams do not at present have anywhere near sufficient overall professional capability for the above purposes and they simply discharge a statutory 'planning control' function based on their understanding of the legislatively supported 'instructions' in the broad guidelines and zonal dispositions supposed to have been incorporated in 'Local Planning Schemes' that are approved by the WAPC.- as being consistent with a Metropolitan Regional Scheme (that was itself not derived from the actual known and verified local conditions to which they should relate).

Since the DoP/WAPC itself has no other professional contact or 'visibility' at a sufficiently local level other than 2 dimensional diagrammatic plans; the overall consequence is that the range of issues that the community perceives as essential for their future living environment needs, is neither adequately researched or creatively interpreted or designed by anyone - with the community interests not being understood, or protected by the 'Public Service' legislated Planning function that is expected by the community to be a State Government Public Service responsibility that they pay for from taxation.

There is therefore currently an essential but undeliverable set of urban design and development planning functions at the local 'end point' - where the complex results of sound urban and suburban design might be realised and quality-verified. Those are however currently, by default, abandoned

by the Planning system to be supposedly (?) delivered entirely ad hoc by commercial Developers. (Whose actual role and purpose is naturally to profit by enterprise and who would certainly not accept any on-going social commitment responsibilities.) – Hence the overall future urban design development system currently fails its primary functional purposes!

REMINDER: Neither WAPC or the DoP have any continuing operational contact with actual sites or means to liaise directly with either prospective developers, or research the actual social realities of people in local communities being planned-for. Most importantly, apart from a compliance role, Local Authorities in practice don't either !

Surely this almost bizarre lack of real engagement throughout the Planning System with the crucial formative elements of practical urban design and development Planning needs to be urgently recognised and addressed?

The State Government through its Planning Department and Planning Commission are clearly at present making unrealistic demands upon Local Authorities, and must fully re-conceptualise the necessary resources for the forecast urban expansion etc. and where best they should be cost-effectively deployed.

### Current Opportunities for Change ? -

An unusual and potentially convenient opportunity may be available to initiate much needed beneficial change in the Planning System overall.- With the WAPC engaged in forward Planning Strategies via 'Perth and Peel @ 3.5 million' and hopefully, together with the EPA prompted by the Commonwealth Government engaging in a full review and revisions of forward Planning Strategies and a 'Strategic Assessment of Perth and Peel Region' (SAPPR) that seeks to address impacts on future development on Commonwealth matters of national significance and State environmental factors.

That review on the part of WAPC appears however to have begun with a relatively narrow focus, to update 5 'high-level' (meaning broad and theoretically desk-researched) Regional Frameworks for the Perth and Peel Metropolitan Region. However, the EPA in a parallel strategic advice document has already made scathing observations about recent Planning outcomes, that should oblige WAPC / DoP to at least take stock of the recent past outcomes of its own existing methodology and consider the appropriateness of that in a 'futures' perspective.

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### A Suggested fundamental Re-structuring of the Urban design and Land-use Planning and Development management System in Western Australia.-

The following proposal and suggestions are offered in an attempt to resolve some of the negative and retrograde features of the existing planning System as detailed above.

Those may assist fresh thinking, to interface forward planning more appropriately with the rapidly changing social and technological community futures context - and in particularly move the Perth

Region closer to world-class in City development. That task, from where we are today in WA , is a daunting challenge and deserves very serious and urgent attention from everyone involved.-

In the immediate future context, urban design and Planning methodology will become increasingly vulnerable to rapidly evolving and unforeseeable trends and multi-faceted technology; and therefore need to be much less regimented, more flexible and tolerant of experimentation and able to accommodate new conceptual ideas on urban living. Increasing choice will be demanded and innovations from other parts of the world imported and need to be experimented-with locally.

Consequently the data and information required to keep the Region abreast, will be expanding rapidly and continuously. Applied research needs to be interactively spread much wider amongst all the professions involved locally in every aspect of future planning, and to remain relevant cannot afford to be frozen into statutory directives applicable to any form of development, other than to safeguard basic community health and welfare.

## PROPOSAL -

The State Infrastructure Planning Commission (*noting that the WAPC has a 16 person membership, already 11 of whom are Senior Executives of other State Government Agencies*) would have a different but very specific Statewide Strategic economic research, population forecasting and general locational advisory role to the Government on all major infrastructure at the 'macro' level, primarily to enhance and achieve cross-sector collaborating coordination between Government Agencies each planning specific services. That Commission with revised functions (and to include both the Senior Executive of the Dept. of Environment and the EPA) would have its own supporting and Statewide Research Unit with re-defined 'whole of Government' links and be administratively separated from - the Department of (Land use) Urban Design Planning and Development.

The Department of Urban Design Planning and Development would become a separate administrative entity, retain distinct but broadly similar capability to the present, but with the addition of - (a) a

more specialised professional Legal Unit;

(b) a Planning Liaison Unit; and

(c) a group of directly employed Regional Urban Design teams.

This functionally revised Department of Planning would have a strategic metro and regional planning framework brief, but that would be altered from the present to become a 'rolling' plan of less specifically detailed 'broad-brush' intentions, linked via an internal functional core Planning Liaison Unit (b) coordinating a series of 'hands- on' professional multi-disciplinary Regional Design Teams (c) directly engaged in - actual creative district analyses, actual concept plan formation and design modelling.

The Legal Unit would advise, adjudicate in principle, and refer for arbitration competing development and conservation interests of all kinds; (replacing the current voluminous, over-complex, costly, slow and heavily bureaucratic chain of Regulations, related to the present Planning and Development Act, that wastefully involves the community in more of the same ).

The Planning and Development Act itself and associated Regulations, with the cooperation of Parliament, would be simplified to facilitate the expected much more dynamic future for the urban design and land-use decision-making process, while retaining the essential principles of adjudicating as a last resort, fairness between competing or conflicting interests, in principle, on behalf of the community overall.

The Regional Urban Design Teams would be engaged, sites and district specific as required, with a detailed urban design evolution and consultancy a role. Seven multi-disciplinary professional Teams would be continuously preparing detailed conceptualisations in e.g. Comprehensive Development Area (CDA) 'precinct' etc. form. Five of them for the Perth-Peel metro Region and two for outer Regions, supplemented as required for newer growing urban centres such as Bunbury, Geraldton and Karratha.

The extent of detailed district modelling would depend on local landholdings.- Commercial Developers would have an opportunity to use in full the modelling options developed by the Regional Teams or introduce their own design team – provided an equivalent new DoP standard of CDA urban design was achievable.

The Regional Urban Design Teams would interface with Local Authorities directly through new appointments by Local Authorities of Local 'Community Development Officers'.

#### Future Relevance of the Local Government Administrative system to Planning? –

As outlined earlier in this paper, the simplified formality mismatch with the functions of creative professional urban design and futures planning, at a local level, is because creative urban Planning is not simply an administrative deployment of money to local services or even the application of received Statutory Instruments, but involves detailed 'live' enquiry, assessment and interpretation of context - both physical on-site, and social interacting with the community, plus foresight derived from recording trends and probabilities, creative visualisation of alternative projections on outcomes, and recommending on balance of options. These functions are very different and indeed far too complex to fit with their other wide range of responsibilities, and Councilors in reality have great difficulty in engaging helpfully with them (sometimes they will say they 'discuss the detail privately beforehand,' but this generally isn't borne out by what is usually demonstrated to the Community in formal Council meetings.)

(Reminder -Local Authorities therefore typically at present don't do any actual site analyses, creative urban design modelling or creative development initiation. )

Local Authority roles in planning would be significantly altered, and the involvement of elected Councilors would be removed from the 'voting' format with minimal free discussion possible as at present under Dept. of Local Government's 'Standing Orders' that they must comply with.

However, all Councilors would have an opportunity to participate via their own new 'Standing-Community Development Advisory Group (i)'. To work with and support their own Community Development Officers (ii) – new positions as described below. Those CDOs would maintain continuing liaison with their relevant Regional Urban Design Planning Team (2 (c) above).

(NOTE: It is envisaged that in the above re-modelled system, both the State Infrastructure Planning Commission and the Department of Urban Design Planning and Development would report independently to and advise the Minister for Planning in respect of their revised functions.)

Regarding the re-structured Department of Urban Design Planning and Development, the centralisation of detailed urban development planning by way of standard statutory 'directives' to be reduced to a minimum (But still retain the capability for arbitration between competing developments and also conservation interests of all kinds via the Legal Unit (a) as mentioned above.) (That reduction in centralisation is because - in the more dynamic future context, central statutory directives become 'frozen' in time at the point of publication and the source- material for them is a collected snapshot of current fact. However, forward predictions on vital aspects are not constants, but known to be changing frequently at an increasing pace.

The unknown dimensions of major variables include very rapid advances in science and technology that most importantly are altering every aspect of individual and social life patterns - as well as making feasible new building design forms and associated technology. In other words the actual elements themselves being planned will be changing rapidly and in unpredictable ways, and professional Urban Design Teams are best placed to be abreast of those, and being part of a Government Department structure, retain Financial and Political (Ministerial) visibility and oversight.

It is obviously now and for the future increasingly difficult for Commercial Developers alone to have any real commitment to comprehensive urban design of integrated urban neighbourhoods – (whether outer suburban, inner suburban or central city). All those in future require complex creative initiatives that have essential links to more comprehensive consideration of - social and situational conditions, well beyond individual sites they may purchase. Properly staffed professional Urban Design Teams as proposed will be best placed to do that.-

Further explanation of the new 'Design Team' functions and their relationship with Local Authorities.-

The Urban Design Teams (c) to be established as outlined would be a new element of the 'Department of urban Design Planning and Development' with revised functions. These would in most cases not only relieve Local Authorities of creative visualised development responsibilities that they have found very difficult, but provide an actual 'hands-on' creative urban design function that the majority of Local Authorities cannot afford due to wildly fluctuating demand.

The multi-disciplinary professional 'Design Teams' introduced would be available on demand for all urban development Districts throughout the Region, prior to commercial developers being approved to proceed with subdivisions that involve any new or re-constructed neighbourhood development. Comprehensive Development Area (CDA) principles would henceforth be applied universally for those - so that neighbourhoods are designed to be integrated as totally serviced and socially balanced concepts from the outset.

Each Urban development Design Team (c) will comprise a relevant range of professional expertise to produce local plans at district level and translate them into potential visual built form, including; e.g. Sites analysis, - local survey investigation, assessment and interpretation of site conditions including



subsurface and surface landform, existing local vegetation and biodiversity, local microclimates; and complex social conditions and needs across all age-ranges, lifestyles and income levels.-

Be able to recommend relevant evolving technology, experimental building and structural forms, servicing methodology and advancing personal transportation technology implications. These Teams would include professional architects, urban landscape architect/ designers and social analysts: (Site-specific social analysis would link directly as required, with the proposed Local Authority CDOs below.)

Local Authority involvement in Urban Design/ Planning would however be fully and frankly re-appraised case by case in terms of actual capability to be involved with genuine informed creative professional planning contributions to offer. That re-appraisal should allow for the possibility that some Local Authorities may choose to set up specific and different means to contribute constructively to local planning. (But that would need to be aside from and different to, their standard procedures under the Standing Orders issued by the Department of Local Government, that have proved unsuitable to deal with the increasing complexity of future urban planning.

However - at the minimum all Local Authorities should have professional (Social Psychologist) Community Development personnel (CDO) *at least one person*, whose roles are intensive social-needs and profiling research, continually interactive community liaison and social-change facilitation within the community. This will provide continuing engagement and expert feedback that has previously been ad hoc, erratic, or completely absent – and minimise aggravation to Community who have such complex and busy lives that they are simply unaware of changes proposed and happening in their locality. These professionals will also be continually involved in post-construction neighbourhood community growth facilitation as an integral part of their work.

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### Summary (of Functional Review Findings)-

The current System of land-use planning and urban design management in WA as currently structured is not capable of managing and supporting the creative future evolution of the Perth and Peel City Region without fundamental change. The current organisation and management of it is effectively dysfunctional in important sectors and detached from association with vital realities of delivering sensible purpose designed outcomes.

No serious attention is actually directed anywhere in the system to practically researching the plethora of different and rapidly changing social needs of the community by any of the participant Agencies (hitherto presumed to include Local Authorities); and incorporating that vital information into actual built development.

Furthermore, despite the magnificent qualities of the natural setting - appreciated by residents and visitors alike, the special biodiverse characteristics of Local Sites throughout the Perth and Peel Region have been almost universally ignored at every practical level of Planning, and are being progressively and irresponsibly obliterated.

It is clearly known and understood that Commercial Developers as a natural result of their business model have no commitment to either of the above key future-planning issues that require

continuing creative involvement; but the vague and detached management of the current System, naively assumes they have.

Connections between the different supposedly functioning Tiers of Urban Design and Planning responsibility have been far more imagined than real by Planning System Management, and consequent failure to detect, confront and resolve them has resulted in an accumulation of excessively wasteful and unproductive bureaucracy – to generally produce what have recently been extensively publicised as inefficient and socially unattractive outcomes.

The Community that one must assume should be essential future stakeholders in the created results of Planning and Urban Design that comprise the actual physical fabric for their future living, are effectively marginalised, and denied real opportunities to collectively contribute, due to the way the System is currently configured and operationally managed.

The current System appears to deliberately ignore the fact that creation of beautiful, efficient, and sustainable future Towns and Cities, and their constituent neighbourhoods, is essentially a Team activity where each of the necessary functional contributions is managed to be respectfully identified, and professionally designed and facilitated to be continuously creative and innovative in their respective roles. -

In contrast, Management of the Development Planning System in WA has currently attempted an (inevitably futile) detached top-down, theoretically-sourced operational style, even extending to (often naïve) detailed design directives; but with obvious limited practical comprehension of how professional Team Processes should be deeply involved – (and not obstructed by unnecessary bureaucratic procedures).

Politicians need to ask simply - why is there such an enormous gap between the copious theoretical Regulatory documentation issued by WAPC and the quality of outcomes?

However, any critical functional review of a business system is of limited value unless remedial measures are suggested. In this case all of the functional components and constituent parts of the system must be fully reconsidered to suit a rapidly changing operational context. A Proposed Model for re-structuring of the Land Use Planning management System has therefore been detailed in an attempt to creatively resolve some of the negative and retrograde features that must be urgently confronted.

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Origin and Authorship.

*[The above Functional Review paper originated in 2015 when there appeared to be to a Government intention to address issues of accelerating approvals (in a State and Commonwealth) “Strategic Assessment of Perth and Peel Region” (SAPPR) but that has thankfully been delayed by more serious attention now to the neglected matter of urban design and the vital issue of practical process management that this discussion paper considers.*

*The 'Review' paper incorporates first-hand professional research, knowledge and experiences recently spread over five years voluntarily assisting various Community groups and informally researching with numerous WA agencies, both Government and Community-based, on numerous issues variously involving the formal urban design and land-Development delivery System in WA, as well as informally assisting Local Authority Councilors to comprehend and interface with complex land-use Planning issues. (Averaging over 30 hours per week since 2011).*

*Having been invited as a former senior Public Servant and independent community representative to a State Planning Strategy 2050 Forum organised by WAPC, the writer became further concerned not only about the structure and management of the Planning System, but also the effective marginalisation of community input and paucity of social-science research that should be at the core of future creative development.*

*An open independent website was therefore initiated and sponsored in 2014, free from advertising material 'Planning for People WA' ([pfpwa.com](http://pfpwa.com)) that "collects insights, critically considers current outcomes and provokes constructive and creative thinking to share and contribute to shaping the future of our cities towns and neighbourhoods" – that has been widely accessed, including by Local Authorities and many creative planning, design and environmental professionals, some of whom have contributed, but most by choice preferred to remain anonymous.*

*Volunteering in 'semi- retirement' has applied the benefit of a long and varied professional career beginning as a Scottish architect and a multi-discipline urban design team leader with a large city in England; innovative professional teaching in the Tertiary sector; initiating environmental education; private professional practice; HM appointed independent professional adviser to the British Government; and later emigrating to WA in a different role. This has included involvement in many peak level national Committees both in UK and Australia; also leading international delegations (from both countries).*

*I know with certainty that the frankly expressed views in this Paper will have widespread professional and community support, and it is offered to the State Government from a professionally informed but independent community-based perspective. I do hope the extensive contribution involved will prove useful.*

*Peter H Forrest . (email: [community23@bigpond.com](mailto:community23@bigpond.com) )*

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## APPENDIX.

This paper is a concluding part of a response to the draft DESIGN WA initiative and comments on the 'Design Skills Discussion Paper' component. Preface.

It has to be said over and over again and is sure to be repeated in future ad nauseam, that the level of design skill creativity applied to creating collective human urban living environments' at all scales of population density in Western Australia over at least the past two decades has been abysmally low and way below those achieved internationally.

Most fully professionally educated and qualified Architects who have travelled extensively overseas would reluctantly agree with that assessment.

There are of course individual buildings that exhibit genuine comprehensive design achievement, for their own client-specific purposes.

However, spatial functionality and sensory relevance of multiple buildings to human needs, that are wide ranging and changing constantly, have actually been severely restricted by the extraordinary low-level of design comprehension in the Public Service units conglomerate called the WA Planning Commission and the Department of Planning, that together currently dominate; and are responsible to the Community via Parliament for the overall Management of Planning in WA.

The whole Planning system in WA has become distorted through a serious and anachronistic managerial error, namely that creating relevant human environments for the future can be achieved by 'Statute' – whereas it quite simply cannot; and ample proof is in the now visible outcomes.

There is for instance just no way that Broad zoning and 'R' codes in the hands of only 'Statutory Planning' educated personnel who almost totally comprise the planning teams employed by Local Authorities to guide lay-person Councillors and Developers, is equal to the challenge of creating an urbanised Perth and Peel Region of international standing for a forecast population of 3.5million. (It is not well understood by the public that those personnel don't actually do any Planning at all but simply administer and advise on the application of Statutory Policies and Guidelines drafted by the DoP and issued under the authority of the WAPC.)

Yet WAPC/DoP have based their whole range of Planning Management protocols on this false presumption, that their remotely conceived statutory directives are creating relevant development. Thus leaving to Local Authorities, that are the actual interface with commercial Developers and Builders who deliver the constructed urban outcomes, in a substantially ad hoc design-free vacuum to pursue whatever is most profitable to them – (maximum profitability being of course their primary purpose.)

The inevitable result is that development of the Perth and Peel Region by contemporary international standards already comprises an undistinguished, boringly repetitive and sprawling, socially fragmenting, inefficiently planned and serviced, site-irrelevant and professionally Design-free failure.

Most concentrated human Activity-centres to date have been - ad hoc functionally and visually uncoordinated mixtures of buildings and spaces of all shapes, sizes and functions with no apparently pre-determined logic of relative future scale, form, pedestrian or vehicular traffic pattern.

This is certainly not by any stretch of community tolerance today an acceptable means of quality assurance for the creation of a State Capital City metropolitan Region, that has one of the worlds most beautiful settings, entirely free from the physical and social degradation of two centuries Industrial Revolution and world wars.

Evidence. -

*(Detailed Professionally derived 'community-consumer based feedback' and a broader critique concerning this vital actual interface between the largely theoretical grand intentions of WAPC/DoP and the means of realisation can be read in an "Independent Functional review of the WA Planning system" on the 'PLANNING FOR PEOPLE WA' website (pfpwa.com) originally compiled in 2015. Sections of that are incorporated here and further developed in this Public comment response. (This Appendix is a more design-specific response to the Supplementary DESIGN SKILLS DISCUSSION PAPER attached to the DESIGN WA document.)*

*That detailed professionally informed investigative Functional Review feedback' from a community consumer perspective leads to the inevitable conclusion that a full scale reappraisal and overall restructuring of Planning Management in Western Australia was an urgent necessity, well before this further complicating Design WA initiative was drafted.*

With Election of a State Government now due very shortly, bearing in mind the many weaknesses of outcomes from the existing central Planning Management machinery and negative environmental outcomes that have been widely reported, *(supported by many of the main organisations involved)* the community is now seeking serious fresh Political commitment in the near term to update and re-structure the overall Planning System.

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Comment in Detail.

The Design Skills Discussion paper makes a series of statements, poses a small number of questions about design skills and then seeks comments on alternative forms of Regulation. All are however set in an existing context of a Planning system that allows non-creative design skilled Local Authorities to be the approval 'gatekeepers' on planning all future urban and suburban development at the interface with commercial Developers.

Planning System within which the proposal is set.-

The DESIGN SKILLS DISCUSSION PAPER, written as a supplement to DESIGN WA, supposedly to be set amidst the current but defective managerial context described in the Preface above, and therefore must for the above reasons be viewed with extreme caution; because without major changes to that overall WA Planning System managerial context, it is simply destined to fail as yet more Statutory Regulation in the hands of personnel who have proved they do not have sufficient understanding of design creativity or process-management applied to Urban Development.

However, read without its unrealistic WAPC/ DoP background introduction, the rest of the DESIGN SKILLS Paper does briefly present a plausible resume – as outlined in the “Design Quality Planning Mechanisms” Venn diagram; and endeavours to relate that to Design Principles, Design Review and Skills aspects.

It does however fail to confront, detail and differentiate levels and complexities of education and skill acquisition; to set down what those actually are; or how those could beneficially fit into overall Urban Design-Planned delivery for future WA – as follows.-

The DESIGN SKILLS DISCUSSION PAPER fails so far to consider design in a TEAM context.

URBAN DESIGN complexity today internationally, has reached the stage where creating every aspect of future Urban environment for human communities must be conceived, organised and managed as an integrated multi skilled TEAM activity, (i.e. with all the TEAM members not all required to be co-located).

Those TEAMS must include a range of skills preferably led and coordinated by highly skilled Design professionals in one of a variety of fields relevant to the size and scope of the proposed development; and they should interface directly with Local Authorities but in a different relationship as proposed (pages 22-25) in the foregoing Response Paper; but briefly outlined again here.-

Suggested Design planning ‘Team’ functions and their relationship with Local Authorities (outline)-

Urban Design planning delivery TEAMS could be a new element of a re-structured Department of Planning and Development with a revised range of functions. These would in most cases not only relieve Local Authorities of development approval responsibilities that they have found very difficult, but provide an actual ‘hands-on’ creative urban design function that the very few, if any Local Authorities are large enough to sustain financially, particularly bearing in mind the erratic timing of development proposals.

The new multi-disciplinary professional ‘Design planning Teams’ proposed would be available on demand for all urban development Districts throughout the Region. That would operate prior to commercial Developers being approved to proceed, on all subdivisions that involve any new or re-constructed neighbourhood development. Comprehensive Development Area (CDA) principles would henceforth be applied universally for those - so that neighbourhoods are designed to be integrated as totally serviced and socially-balanced concepts from the outset.

Each Urban Design planning TEAM would comprise a relevant range of professional expertise to produce draft local plans at district level and translate them into potential visual built form, including; e.g. Sites analysis, - local survey investigation, assessment and interpretation of site conditions including subsurface and surface landform, existing local vegetation, biodiversity and local microclimates; and make a preliminary assessment of the increasingly complex social context conditions and local needs across all age-ranges, lifestyles and income levels.-

The Team will include expertise able to reliably recommend relevant evolving technology, experimental building and structural forms, servicing methodology and advancing personal transportation technology implications. These TEAMS would include professional architects, urban

landscape architect/place designers and social analysts: (Site- specific social analysis would link directly as required, with proposed Local Authority CDOs described below.)

Local Authority involvement in Planning would however be fully and frankly re-appraised case by case in terms of actual capability to be involved with genuine informed creative professional design planning contributions. That re-appraisal should allow for the possibility that some Local Authorities may be approved to set up specific and different means to contribute constructively to local design planning. (Would require changes to authorised procedures under their Standing Orders issued by the Department of Local Government, that have now proved inappropriate to deal with the increasing complexity of future urban design planning.)

However - at the minimum all Local Authorities should henceforth have professional (Social Psychologist ) Community Development personnel (CDO) - at least one person, whose roles are intensive social-needs and profiling research, continually interactive community liaison and social-change facilitation within the community. This will provide continuing local engagement and expert feedback to both Design planning TEAMS and to Councils that has previously been ad hoc, erratic, or completely absent – and minimise aggravation to Community who today have such complex and busy lives that they are simply unaware of changes proposed and happening in their locality. These professionals will also be continually involved in post-construction neighbourhood community growth facilitation as an integral part of their work.

*(It is worth noting here that ‘Short cuts’ for the commercial convenience of Developers have been rife, allowed by poor management of the overall Planning process in WA, allowing them to employ only some or even no professional design planning skills. That has substantially contributed the serious decline in creative quality of outcomes.)*

There are in fact very few examples in WA of deliberately created multiple building and spatial organisation that could be explained methodically as deriving from conscious user analysis or deliberate effort to recognise and harmonise with their pre-existing site characteristics.

*(‘Master Planning’ has recently been used locally by some commercial Developers as a marketing term to imply what are known overseas as Comprehensive Development Areas, but in fact very few, if any in WA so far have in fact yet been fully and comprehensively Designed as such.)*

Architects in Urban design.-

The core skills of Professional Architects to whom BUILDING DESIGN have been attributed for many centuries, are recognised as being a complex melding of art and science – and their work traditionally said to ‘reflect the Civilisation of an era’. Historically, their learning was through ‘Articled Pupillage’- that was a ‘Premium’ paid-for understudy system. That was abandoned in the 1950s when higher university education was gradually broadened internationally from ‘the Classics’ to include some applied-academic subject studies for other professions. In the case of architecture that began in the few most prestigious universities as the History or Art and Architecture, but then quickly moved to recognise the very substantial breadth of academic rigour involved in the practice of Architecture).

Today that complex combination of art and science requires tertiary higher education spanning a total of 5 years full time study (usually concluding with a Master's Degree) plus 2 years of supervised practical experience - as outlined in the DESIGN SKILLS DISCUSSION PAPER.

However, supporting Architectural and Associated Technicians (previously draughtsmen) assisting with the draughting of construction and structural detail, have also been growing in number and their skills advancing with the increasing sophistication of computer aided applications. The extended availability of such visualisation techniques to Computer-aided 2 and 3 dimensional DESIGN has confused both job descriptions and education involved by loose use of the term 'CAD'. The DISCUSSION PAPER should have explained that there is a major skills difference between a Draughting Assistant and an Architect who is required to have a very much wider academic education and skills training in genuine CREATIVE DESIGN.

Today and for the future however, in tune with the vastly more complex body of knowledge available, CREATIVE DESIGN by Architects for urban living has massively increased in scope and sophistication.

For instance in the creative Art skills component – knowledge of human cognitive sensory perception of e.g. colour, texture, sound, spatial experience and constituents for different levels and means of mood creation (formality, informality, vibrancy, relaxation, cognitive reflection etc.) have all broadened both the available range and scope of artistic creativity as well as being reinforced by the increasing human appreciation of them – already now well beyond transitory fashion or 'style'.

In the science component similarly, new man-made materials derived from constantly advancing molecular research are evolving a vastly expanding range of useful materials introducing both extended structural and surface capabilities and new industrial processes such as pre-forming, light weight transportability assembly and demountable flexibility – offering vastly more potential for potential design forms.

While changes in useable form and finishes are creating some new 'fashions' they are also changing perceptions of user-responsiveness and affordable choices to more closely respond to personal needs.

Architectural Design today has thus become far more akin to 'hitting a constantly moving target' than a simple 'expression of an era'. (Even the concept of an 'era' has become so fluid that, short of the intrusion of massive epoch-defining events, civilisation itself is now incredibly complex and difficult to define.)

However, it is most useful to note today the abiding design power of the Bauhaus movement throughout the 20<sup>th</sup> century into the present. The principles of 'form arising from detailed study of function', the related advancement in the science of human ergonomics, and the reaction against elaborate decoration into 'minimalism', both later reinforced by Scandinavian design simplicity and intensively automated manufacturing.

But we also need to remind ourselves that Urban Design by Architects has a very long history often reinforced (as in other Arts such as music painting and sculpture) by wealthy patronage and closely related to social needs of their era. Such as the enormous visual demonstrations, powerfully reinforcing autocracies, religious and military dominance in vast building complexes and formal



Plazas; the advancement of construction technology in extending the compressive strength of stone in the enormous fan-vaulting of gothic cathedrals combined with the extreme heavenward vertical artistic aspiration of their external form.

Architectural Design skills spawning other professions.

Landscape art and design began in earlier centuries as an adjunct to formal buildings, similarly reinforced by powerful patronage; moved through an era dominated by intricate use of domestic planting and then on to outdoor spatial design in urban settings. The sensory psychological effects of different scale and juxtaposition of materials (hard and soft) designing outdoors is now making a substantial contribution that is interacting closer than ever before with building design. – Where shape and organisation of spaces between buildings is used interactively to suggest or even define mood relative to functional utility. Both professions can now work together with increased understanding of the psychology of visual perception, to use light and shade variably to induce movement and deliberately locate forms and structures by conjoint design to create and control activity and define a particular sense of ‘place’. Yet we should remember that all of those techniques do have historical precedents even if given new names to define a new or future purpose.

Landscape Architects do however provide another future planning role, in the vital interface with the natural environment. Their knowledge of the interaction of soils, surface geology, hydrology, microclimate and biology can contribute substantially to the selective retention and incorporation of natural environment into urban and suburban settings. They can undertake professional site-assessments and provide creative advice (*to prevent commercial Developers being permitted as at present through the existing mismanaged Planning System, from repeatedly clear –bulldozing and destroying unique areas of high future community value indigenous natural environment surrounding our metropolitan Region.*)

Regulation ?-

This issue must be considered in a Public Service context. Regulation must therefore be such as to clearly benefit the community in future.-

To overtly take action in the collective public interest.

To balance and ensure fairness in competition for the use of land for individual purposes including for private profitability.

To manage outcomes in the collective public interest.

To ensure clarity and consistency in the appropriate deployment of available skills.

The first essential step is to rectify the authenticity and current relevance of the Regulator. Since neither the current State Government or Parliament have reviewed the Planning System for some several years; and this initiative - in the public interest clearly involves a fundamental change of policies and practices that have wide significance for many other Agencies (including Local Authorities who are currently charged with overseeing delivery), this initiative must first be thoroughly reviewed at those peak levels.

In preparation for that, a detailed analysis must be assembled that thoroughly explains the range of the intellectual and practical creative skills required for the future and where and why they are not already available and deployed currently.

In that context much more detailed work needs to be done on this initiative before any action is taken to commence any kind of Regulation.

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*(Peter H Forrest, Kalamunda, WA 6076. Email: [community23@bigpond.com](mailto:community23@bigpond.com) )*

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