

12 April 2016



Australian Institute of Architects

Hon Donna Faragher MLC
Minister for Planning; Disability Services
7th Floor, Dumas House
2 Havelock Street
WEST PERTH WA 6005

Dear Minister

The Australian Institute of Architects advocates on behalf of the architecture profession and the community to enhance the quality and amenity of our built environment. We take this opportunity to once again congratulate you on your appointment as Minister for Planning and Disability Services, and to affirm our desire to assist you with the significant matters in your portfolio including the Planning Reform for Better Design reforms.

HOUSING DIVERSITY AND DENSITY

Australia is a highly urbanised country and its population is growing dramatically. ABS statistics indicate that our population will grow to 40 million by 2051, with the large proportion of that growth expected in our urban centres like Perth. The most effective way of housing more people in our cities is to plan for greater diversity and density within the current urban footprint. This approach makes maximum use of existing infrastructure, helps to protect arable land on the city fringe, prevent further sprawl and ensure a critical mass of people to make communities more cosmopolitan and vibrant.

But this increase in diversity, density and population needs to be accompanied by minimum standards and require architects and developers to build good multiple housing that provides a high quality of living for residents.

Good design in multi residential buildings is about meeting the complex demands of accommodating a number of people in different configurations in the same building. It also means delivering improved amenity and durability – things like access to sunlight, proper ventilation and thermal comfort. Construction quality is also paramount to ensure good long term outcomes and re-sale values.

Architects have the requisite training and skills to design complex buildings that meet high standards and community expectations. They also understand the importance of contextual fit and the contribution a building makes to the quality of a street.

The New South Wales State Environment Planning Policy 65 [SEPP 65] is the most comprehensive regulatory regime addressing the design quality of residential buildings in Australia. SEPP 65 and its accompanying Residential Flat Design Code were gazetted in 2002 and amended in 2015. The revised SEPP, which is the legislative instrument, gives effect to the standards spelt out in the accompanying Apartment Design Guide. The legislation stipulates that apartment buildings above a threshold must be designed by architects.

In some local government areas design review panels provide advice on the design quality of development proposals to consent authorities, but the use of such panels is not universally applied in dense urban areas. In Victoria the State Government has released Better Apartments, a discussion paper proposing standards similar to those in SEPP 65. Other jurisdictions are moving to follow suit, including Western Australia as part of the Planning Reform for Better Design process.

It is our very clear view that a regime akin to SEPP 65 is needed in Western Australia to ensure the design quality of our communities and maximise the economic and social benefits that flow.

DEVELOPMENT ASSESSMENT PANELS

The Institute believe that DAPs have worked well since their inception in 2011 and that it is inherently better that major developments are decided after professional consideration, rather than sometimes short sighted activism and very localised politics. Indeed the beauty of DAPs is the high degree of objectivity applied to making determinations, when necessary, that are in the long term economic and social interest.

It is important that communities are well represented in planning and that Town Planning Schemes [TPS] have an adequate framework to reflect the way of life in each local government area. It is just as important that the authorities have a mechanism to prepare for future needs on the basis of population growth, changing lifestyles and transport demands. The TPS is the place for the community to ensure its values and aspirations are outlined. It is the DAP's remit to apply the TPS in a professional manner.

As Perth's communities become more dense and diverse, DAPs will be more important than ever. It would be enormously retrograde to diminish or remove a system that is serving our planning process effectively.

SOUTH PERTH AMENDMENT NO. 46

The Institute does not support the amendment currently before the City of South Perth Council, believing it be retrograde and contrary to the spirit of your Government's *Directions 2031 and Beyond* planning strategy which recommends high quality inner city development to meet population growth. Indeed there was widespread support for the City's current town planning scheme ahead of its adoption in January 2013 when an extensive public consultation process was undertaken.

Of particular concern is the removal of up to 15% (or 20,000m²) of developable land, something that threatens more than \$240 million in direct construction investment and an estimated 8000 jobs. Similarly the proposed height limit reductions, commercial-residential ratios and setbacks represent a significant impediment to investment and economic growth. Indeed without sufficient density in the area there is concern that your Government will put on hold, plans for a South Perth train station and increased ferry services.

The Institute understands that there has been little empirical study used to justify Amendment No. 46 with Council instead being influenced by a vocal anti high-rise group.

This should alarm residents of not just South Perth, but any jurisdiction relying on mixed development growth and visitor numbers in order to be economically sustainable.

We recommend in the strongest possible terms that Amendment No. 46 be rejected by the City of South Perth Council and that you do everything in your power to prevent it going ahead.

We hope you find this a useful précis of our position on these important current matters. We would very much appreciate the opportunity to meet with you as soon as possible to further discuss them in more detail.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Philip Griffiths', with a long horizontal flourish extending to the right.

PHILIP GRIFFITHS FRAIA RIBA M.ICOMOS
STATE PRESIDENT WESTERN AUSTRALIA