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Meagan Wells

Senior Urban Designer – Reform, Design and State Assessment

Department of Planning, Lands and Heritage

140 William Street, Perth WA 6000

Via email: meagan.wells@dplh.wa.gov.au

Draft State Design Review Panel Manual 2024

Thank you for the opportunity to provide feedback on the draft State Design Review Panel (SDRP) Manual 2024.

The Urban Development Institute of Australia (UDIA) WA is the peak body representing the property development industry in WA, with members across both private and public sector organisations. Our Vision is for ‘Diverse living options in thriving, connected communities’, and we strive to support this in working towards our Purpose of ‘Great places + Housing choice = Better lives’.

UDIA WA welcomes the draft Manual and the engagement with industry in finalisation of the document. Ensuring the roles, responsibilities and requirements of both the development industry, referral bodies and the SDRP are correctly and clearly defined is important in the delivery of a range of housing products and the development of great places for the community to live in.

Please see below our comments and suggestions in line with your requested questions.

1. Is the information in the Manual clear and easy to understand? If no, please elaborate.
 - Overall, the Manual itself provides a clear explanation on the SDRP process and the logic behind design review.
 - We note however, it is unclear whether this document is intended to supersede existing Design Review Guidance from DPLH or sit alongside this guidance. The document should be explicit in its purpose, and reference other documentation if it is part of a suite of existing documentation.
2. Are roles and responsibilities for different user groups (proponents, referral bodies, etc.) in the SDRP process well defined? If no, please explain why?
 - More specific guidance could be incorporated to indicate situations where external stakeholders could be brought into the design review process, and how that process would be managed.
 - Guidance on the role of SDRP and the Office of the Government Architect (OGA) in the condition clearing process should also be included in the Manual.
3. Are the processes clear and easy to follow? If no, how can we improve?
 - Yes, the process is easy to follow with a good balance of structure and discretion for specific requirements of a particular project.

4. Are the diagrams clear and communicative? If no, please provide suggestions below.
 - The diagrams are generally clear and communicative. It is recommended that in Figures 3 and 4, the main role and support role be more clearly communicated.

5. Are there any information or process gaps in the document? If yes, what are they?
 - Clarification as to the general principles and/or logic as to how SDRP members will be selected would be welcomed.
 - Further information on the format of ad-hoc design advice provided by SDRP should be included in the Manual. This could include the format (whether it is generally organised around the 10 Design Principles); guidance around how this advice is to be used by decision makers and proponents (whether it is included in development applications or public agendas); and whether design advice could be provided in-lieu of an additional review meeting.
 - We note that the Manual does not provide guidance on the conduct of SDRP members. It would be beneficial for guidance to be provided and it is assumed that this is provided in a separate code of conduct document to SDRP members.
 - Further clarification as to the nature of “ad-hoc or flexible advice” would be appreciated, if this means a review by the Chairperson without a convened full meeting, then this would be a positive step to improve efficiency.

6. Do you have any other thoughts on Design Review you would like to share?
 - Feedback from the SDRP can be of a highly fastidious nature, despite the role of the Panel being to evaluate large projects that are ‘state significant’ and should largely be focused on the ‘bigger picture’ context.
 - Recommendations are often of a nature that would substantially increase construction costs. Whilst this may be necessary and appropriate in some circumstances, we believe the Panel should be asked to remain focused on material design matters and cognisant of the implications for unnecessary cost escalation, particularly considering the current construction costs and housing crisis.
 - Consideration could be given to reviewing and reducing the timeframe for the provision of advice, with 5-7 days being considered appropriate.
 - Through the Design Review process, it needs to be better understood and acknowledged that most design concepts are the result of an extensive iterative design process that follows a specific brief. It is impossible for a panel to understand a project to the same level of detail as the project team, especially considering the limited amount of time that is available to explain the proposal. For this reason, a panel should present ‘Design Advice’ as genuine advice and as ‘Opportunities to Explore’, rather than ‘must haves’. Minutes should be concise, with Advice and Opportunities to Explore captured as such.
 - There are some developments within this Manual that we see as positive responses to perceived issues and look forward to seeing these changes implemented. We will work with our members as to understand the success of their implementation, these include:



- Messaging from the SDRP (including within the Manual) that proponents should come in at the early stage when, in practice, when this occurs the design team is often questioned or criticised on the lack of information. It is positive to see the manual reinforce this early engagement.
- The overriding feedback from many reviews relates to a critique of the designer's interpretation of context and character, despite a generally low proportion of site viewings as part of design review. It is positive to see the Manual suggest that site visits can occur in appropriate circumstances as this should bring a more balanced view as to a site's context and character.
- Panels often comment on planning matters including whether they support variations to the planning framework. It is positive to see the Manual sets more clear guidelines around this.
- Generally, design review has improved the quantity and quality of infill development in Perth albeit there are still many areas to improve, particularly with respect to the process at a Local Government level. However, we understand this process will be undertaken as part of the next stage of the Design Review Guide update project.
- Clearer pathways for state-level design review for major projects and a greater focus on major government infrastructure projects are welcome developments in the design review space.

We look forward to being involved when the updates to the Local Government Design Review Manual are available for comment and welcome the opportunity to engage on this matter as early as possible. Should you require further information or wish to discuss this please contact Isaac George, Policy Officer at igeorge@udiawa.com.au or 9215 3409. Thank you again for the opportunity to provide feedback.

Yours sincerely

A handwritten signature in black ink that reads 'Sarah Macaulay'.

Sarah Macaulay

Executive Director – Strategy and Policy