



**WALGA**

**Interim Submission  
July 2009**

**Accessible Communities Study**

Western Australian Local Government Association  
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## EXECUTIVE SUMMARY

WALGA supports the concepts and ideas articulated in the *Accessible Communities Study*, however, recognition is needed that there are obstacles to implementation that this report and its recommendations are unlikely to overcome. In some instances, some of the recommendations may even be counter-productive to the intent of the Study, or existing State policies.

It is noted that the Study proposes a substantial change in the policy of the Western Australian Planning Commission (WAPC) which is being progressed without adequate consultation, research or consideration of the potential impacts. The limitations of the consultation to a few selected participants, and the very limited time between the briefing and deadline – five working days – has meant a limited opportunity for review by WALGA staff, and no opportunity for Local Governments generally.

Detailed below are a number of suggestions and comments on the recommendations of the report. Despite the concerns outlined, WALGA feels that the concepts presented in Study have merit, and wish to reiterate that Local Government remains in accord with the underlying principles of accessible communities and the continuing focus on active transport in the community.

## BACKGROUND

The Western Australian Local Government Association (WALGA) is the united voice of Local Government in Western Australia. The Association is an independent, membership-based group representing and supporting the work and interests of all 139 Local Governments in Western Australia, plus the Christmas Island and Cocos (Keeling) Island Councils.

The Association provides an essential voice for almost 1,400 elected members and over 12,000 employees of the Local Governments in Western Australia. The Association also provides professional advice and offers services that deliver financial benefits to Local Governments and the communities they serve.

Local Government in Western Australia is facing a number of financial constraints, identified both at the national, state and local level. These must be taken into consideration with the development and implementation of Australian and State policy positions by Local Government.

The capacity constraints facing Local Government in Western Australia are symptomatic of the issues facing the Local Government Sector nationally. At a national level, The House of Representatives Standing Committee on Economics, Finance and Public Administration Report, *Rates and Taxes: A Fair Share for Responsible Local Government* (the Hawker Report) found that escalating costs and constrained funding along with growing community expectations and a funding gap threatens the future of an efficient and responsive Local Government.<sup>1</sup>

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<sup>1</sup> Australia. House of Representatives Standing Committee on Economics, Finance and Public Administration, 2003, *Rates and Taxes: A Fair Share for Responsible Local Government*, Canberra, p 11.

As part of the Australian Government response to the Hawker Report, the Productivity Commission was asked to examine the capacity of Local Government to raise revenue from their own sources. The draft report, *Assessing Local Government Revenue Raising Capacity*, indicates that despite calls for increased funding from the Australian and State Governments, most Local Governments appear to have some limited capacity to raise more revenue if they and their communities wished to do so. More importantly, the findings outlined in the final report *Local Government Revenue-Raising Capacity* qualifies these concerns highlighting that a significant number of Councils, particularly in rural (87 per cent) and remote (95 per cent) areas, would remain dependent on grants from other spheres of government to meet their current expenditure (Finding 5.5).

Due to the short timeframe to comment on the consultation paper, it has not been possible to fully consult with Member Councils, and so an interim submission is made. With this in mind, our submission seeks to anticipate potential problems that could occur.

## COMMENT

The development of pedestrian-friendly integrated communities has been the ambition of the planning system for at least twenty years. Many previous policies have been developed along these lines, going back to the Green Streets concepts and programs of the 1980s. None of these policies and programs have delivered a substantial adjustment in how new subdivisions are planned and built. There does not appear to be significant research in the report into why previous attempts to make communities more pedestrian/cycle friendly, and reduce vehicle usage have not been successful, but it would appear that such policies fail at the implementation phase.

Presuming this is the case, it follows that in attempting to reform land development along these lines, the initial focus should be on investigating why previous attempts to introduce new ideologies have failed to deliver, and subsequently concentrate resources on learning from those experiences and overcoming those obstacles.

There also appears to be a general presumption (Recommendations 3.9, 5.1, 6.1, 7.1) that the impediment to introducing this policy is Local Government. WALGA disputes this as the planning system incorporates many stakeholders and agendas. No research appears to have been conducted to support this assertion, and the consultation by the review group has largely excluded Local Government, limiting the opportunity to consider practical experience in development of integrated transport plans and accessible communities.

In considering this, it is relevant that Local Government does not control a number of critical functions related to the development of safe pedestrian and cycle friendly communities and local governments attempting to implement Integrated Transport Plans (ITPs) have encountered significant problems and limited State support. As examples, these include an inability to determine public transport planning, set speed zones, develop positive revenue incentives and develop innovative approaches.

It is a fact that Perth people currently move large distances to work, recreate, educate, shop and socialise. It is therefore unlikely in the short term that any substantial changes to this social structure will occur. The road transport network has developed to meet current demand and it seems unlikely

that this demand will reduce in the short term since the predominance of trips remain vehicular. Implementation of this plan to reduce reliance on motor vehicles is going to require concerted effort over a significant area and all stakeholder agencies.

It is also noted that the report and policy appears to focus exclusively on the metropolitan area to the exclusion of regional centres and country areas. As the peak body for Local Government in Western Australia, WALGA has concerns that a metro-centric approach would be attempted across the State.

This report has failed to identify some of the major economic and environmental drivers for a reform of transport planning practice. In generic terms, roads are resource and cost expensive to build and maintain. They also generate a heavy environmental footprint with greenhouse gases, vegetation clearing etc. Research into the implications of this are needed, as they are of great significance.

The report also fails to address the State Road Safety Strategy and road safety is not identified as a core fundamental. Road trauma is a significant ongoing burden to the community and Government. Road safety risk is also an impediment to accessible transport planning. The State Road Safety Strategy identifies four fundamental safe system objectives (1) safe roads and roadsides, (2) safe vehicles, (3) safe drivers and (4) safe speeds. There are strong synergies between Accessible Communities and Safe Systems. WALGA would suggest that the Department of Planning seek feedback and input from the Office of Road Safety.

WALGA also considers that the definition of an “accessible community” should be modified to explicitly embrace the concept of safety. Also that the State Governments Towards Zero: Road Safety Strategy 2008-2020 be added to the list of Non-WAPC Policy and Guidelines.

Finally, the potential impact on our Member Councils is substantial in relation to Local Government road funding. It is also noted that only local road funding is mentioned in relation to ITPs and not state funding for transport infrastructure. The recommendation may need to be modified and the need for transitional arrangements acknowledged.

## REVIEW OF RECOMMENDATIONS

1.1	<p><b><i>Local Government must be encouraged and supported to prepare Integrated transport Plans covering existing and planned areas to provide a more integrated approach to schemes and to funding proposals.</i></b></p> <p>Agree in principle. Many local governments are (or have) already developing integrated transport plans. The process requires strategic State leadership and supportive funding.</p> <p>Local Government recognises the importance of integrated transport management, and in principle supports the development of a planning framework to deliver these initiatives. However, any initiative will require leadership from the DoP, and an injection of funding to deliver these measures. The creation of another layer of process on top of the already complex approvals system is unlikely to be welcome. The State Government is already undertaking substantial work to reform and streamline the planning system in WA, with Local</p>
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	<p>Government support, and WALGA would be reluctant to see the intentions of this reform program undermined by a new layer of planning requirements.</p> <p>Staff within DPI have worked with local governments on integrated transport planning. The lack of resourcing provided by State Government has meant that support is intermittent. Suggest that an additional recommendations include that the State Government adequately resources the Department to provide strategic support and resources to Local Government for integrated transport planning and “That DoP facilitate a workshop session with local governments to obtain direct feedback from them on the effectiveness, constraints, obstacles and successes of integrated transport planning in Western Australia.”</p>
<p>1.2</p>	<p><b><i>Comprehensive guidance on the development of Integrated Transport Plans needs to be prepared in partnership with WALGA for local governments. This must take into account any plans that have already been developed by local governments.</i></b></p> <p>Supported. Recent discussions between WALGA &amp; DoP include the preparation of model Integrated Transport Plans as a resource tool for local governments. This work was commenced by DPI a number of years ago and due to resourcing constraints within the Department was not completed.</p> <p>While WALGA welcomes a partnership approach, and will work with DoP on this matter, it should not be at the expense of broad consultation of the Local Government sector, particularly as many Local Governments already have existing plans that, while perhaps not as comprehensive as is envisaged, do deal with specific areas of the proposal such as physical activity, pedestrian access, cycling paths and connectivity plans etc.</p> <p>However, note that a single model for Integrated Transport Plans is unlikely to be applicable or appropriate in all circumstances and various attempts to use a pre-existing model in a new area have not tended to be successful.</p> <p>Suggest an additional recommendation to the effect that; <i>“A peak committee incorporating representatives of DoP, Main Roads WA, Local Government, DoT and the Public Transport Authority be established to work cooperatively to develop a whole of Government approach to facilitate and support the preparation of model Integrated Transport Plans as a resource tool for local governments”.</i></p>
<p>1.3</p>	<p><b><i>A method of evaluating each program and providing feedback on components of Integrated Transport Plans must be identified and undertaken by State Governments agencies.</i></b></p> <p>Supported. We suggest that the concept of road safety is included i.e.: addition of transport requirements, including road safety, to the definition. This might be best achieved through the examination of case studies on an individual basis, as the variables involved between different regions are significant. DoP should develop a method of evaluation of plans, in consultation with Local Government. Without evaluation of programs, the ability to determine the effectiveness of the program, approaches taken will be questionable – and as a result will be</p>

	detrimental to the ability to learn from short comings, and expand successful approaches across the State.
1.4	<p><b><i>It is imperative that the WAPC align outcomes of other studies and strategies e.g. the Perth Bicycle Network Review, Directions 2031 Spatial Framework for Perth and Peel and future corridor planning.</i></b></p> <p>Agreed. The Draft State Planning Policy; Activity Centres for Perth and Peel appears of particular relevance.</p>

2.1	<p><b><i>More funding is required for retrospective pedestrian, cycling and bus stop improvements. Options for introducing triple bottom line assessment of transport schemes for co-funding and for 'area based schemes' should be investigated as mechanisms by which increased funding for pedestrian infrastructure could be obtained. The development of strategic walking routes such as 'greenways' should be considered.</i></b></p> <p>The general intent of this clause is supported and WALGA can attest to the need for additional funding. However, consideration of funding needs should be the outcome of research into functional need and appropriate planning. It must also be noted that the funding must be additional and not a reallocation of existing funding to Local Government.</p> <p>Suggest additional recommendation <i>“That the DoP undertake an investigation into the current structure, funding model and sustainability (triple bottom line) of existing pedestrian networks. The objectives of this review to identify whole of government benefits (environmental, social and functional) of accessible community planning for WA, existing infrastructure, existing funding and infrastructure gaps.”</i> That report could then inform discussions with key stakeholders, budget decisions and priorities.</p>
2.2	<p><b><i>The allocation of transport funding must be linked to the contents of agreed local government Integrated Transport Plans that identify networks and safeguard their implementation over time.</i></b></p> <p>This recommendation proposes a restrictive and limited approach to a complex situation. Irrespective of any other consideration the allocation of transport funding (by the Commonwealth, State and Local Government) is beyond the scope of the WAPC and any changes to the existing funding models will need to have their merits considered and debated. The correct mechanism for ensuring the sustainability of infrastructure investment is proper asset management, and WALGA supports asset management as an underlying principle of good governance. All local governments are working towards this. Identification of priority areas for investment by government should be linked to appropriate planning and that is predominantly the current process for all transport investment. This recommendation should be split into two objectives (1) WAPC working with infrastructure management agencies and funding bodies to include integrated transport planning principles in all funding decisions, and (2) funding decisions being linked to whole of life cycle asset management planning by the infrastructure management agency.</p>

	<p>The rationale provided is of limited relevance to the recommendation but is also an important point with particular relevance to State funding decisions. It is suggested that there should be a recommendation to the effect that; <i>“The State Government develop, fund and implement a state-wide integrated transport strategy which links the integrated transport strategies of local governments and prioritises the allocation of State resources to projects of maximum benefit.”</i></p>
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<b>3.1</b>	<p><b><i>Draft a new State Planning Policy for Accessible Communities.</i></b></p> <p>A State Planning Policy on Integrated Transport that incorporates provision for accessible communities would be a useful strategic tool.</p>
<b>3.2</b>	<p><b><i>Review State Planning Policies for which gaps have been identified by this study including review of SPP 3, 3.6 and 4.2.</i></b></p> <p>A review of current policies to identify the gaps is noted. It is agreed that effective policies provide clear and specific standards on acceptable outcomes.</p>
<b>3.3</b>	<p><b><i>It is important that the content of Development Control Policies (e.g. DC 1.5 Cycling published in 1998) are updated and, as originally intended in Liveable Neighbourhoods, integrated into the one document.</i></b></p> <p>It is agreed that development control policies be reviewed regularly to ensure consistency and relevance. The aim of <i>Building a Better Planning System</i> is to shift the focus away from statutory processing to the achievement of strategic outcomes.</p>
<b>3.4</b>	<p><b><i>Development Control Policies must be prepared for pedestrian planning.</i></b></p> <p>Agreed.</p>
<b>3.5</b>	<p><b><i>Development Control Policies (irrespective of their published form) must be used to convey development standards not street design standards and must point users to supporting guidelines such as Liveable Neighbourhoods, a Manual for Streets, or Walking and Cycling Design Guide (see below).</i></b></p> <p>Agreed.</p>
<b>3.6</b>	<p><b><i>The review of Liveable Neighbourhoods needs to ensure that the range of objectives are more emphatically addressed in the regulations. (NB&gt; The review has also been proposed by Directions: 2031: Spatial Framework for Perth and Peel).</i></b></p> <p>Agreed. WAPC should seek the advice of the appropriate experts with respect to the various rationales proposed for this recommendation. Need to ensure that road reserve design and width is appropriate to accommodate public utilities as per the Utility Providers Code of Practice for WA.</p>

<p>3.7</p>	<p><b><i>A Manual for Streets needs to be produced to show how context sensitive design can be applied to design of movement networks in urban areas including town centres. It is important that pedestrian and cycle design guidelines are incorporated into the Manual for Streets. This also will help local government to understand processes associated with the implementation of strategic networks like the PGN. A Manual for Streets. This also will help local government to understand processes associated with the implementation of strategic networks like the PBN. A Manual for Streets would offer greater detail for the Perth vision and would sit below Austroads, possibly replacing or at least creating a need to update MRWA Standards.</i></b></p> <p>It is not entirely clear what the author intends to be included in a Manual of Streets however DPI has just funded the development of Engineering subdivision standards which largely address street form, function and design requirements. It would be sensible for all street requirements to be consolidated in a single document and not produce a second document.</p>
<p>3.8</p>	<p><b><i>The review of the Model Scheme Text will need to link Integrated Transport Plans (proposed by Recommendation 1.1) to the local planning process. The Draft State Planning Policy 3.6 Development Contributions for Infrastructure (Draft) should reinforce the nexus between Integrated Transport Plans (proposed by Recommendation 1.1) and developer contributions.</i></b></p> <p>This appears to be out of date with the proposed reform of the TPS regulations and Model Scheme Text, as developer contributions plans are now proposed to be included in the new <i>Planning and Development (General Scheme Provisions) Regulations</i>. The inclusion of Integrated Transport Plans into this section is considered appropriate.</p>
<p>3.9</p>	<p><b><i>It is recommended that DoP develop and Accessible Communities infrastructure audit which checks design and infrastructure against a desired level of service to ensure quality cycle parking, cycle paths, pedestrian paths, seating, water fountains and lighting are provided. Adherence to level of service standards must form part of the planning framework and be included in the model scheme text.</i></b></p> <p>It is not clear if this clause is intended to apply to new green-fields subdivisions or retrospectively to existing areas. The setting of ‘service standards’ is intrinsically linked to the implementation and operational costs of infrastructure, and to community wants and expectations. The substance of this recommendation appears to be for a uniform state-wide standard of service, however, this does not reflect that different communities in different areas of the State have different desires and expectations and different capacities to pay for services. It is unlikely the service standards of the Western Metropolitan area will be of relevance to the Mid West Region of the State. We suggest that the setting of service standards is not a function of the WAPC, but rather a function of the local community, through the local government.</p>
<p>3.10</p>	<p><b><i>The Guidelines on Transport Assessment should undergo a time-restricted trial (have been under review since 2006) or be reviewed in response to recent international work on thresholds and finalised. Further, the Transport Assessment can ensure early consideration of non-car modes (during first or second stage of development) and place the onus on the</i></b></p>

	<p><b><i>developer to demonstrate how non-car users are to be catered for. Travel Plan requirements also need to be considered.</i></b></p> <p>We agree that <i>The Transport Assessment Guidelines for Developments</i> produced for trial and evaluation by the WAPC in August 2006 need to be reviewed, in particular to ensure road safety concerns are considered within the document.</p>
<p><b>3.11</b></p>	<p><b><i>MRWA should review and improve the design check procedure and assessment, which is to be carried out on new projects from the perspective of fostering Accessible Communities and investigate how this can be rolled out to local government.</i></b></p> <p>The Report assigns considerable responsibility to Main Roads WA (MRWA) who are the lead state agency and centre for expertise for the design and construction of roads in WA. Local Governments look to MRWA for leadership in these matters. MRWA has some involvement in the land development approval process, but minimal experience with residential streets and residential street management, as Main Roads manages only 28% of the road network (highways and freeways) and a fraction of the footpath network. DoP should be looking to Local Government as the primary partner for Accessible Communities who will work in partnership with Main Roads.</p>
<p><b>3.12</b></p>	<p><b><i>In line with Directions 2031 Spatial Framework for Perth and Peel recommendations, the Residential Design Codes must be overhauled to allow the current codes to remain in place with a new code laying out a 'smart code' approach to residential development. NB: a review for higher density and medium density codes is currently underway and needs to consider minimum densities.</i></b></p> <p>Agree in principle. These matters will require strong Local Government involvement.</p>
<p><b>4.1</b></p>	<p><b><i>A road classification based on context sensitive solutions and interconnected local, district and regional grids, must be better communicated within planning and transport documents.</i></b></p> <p>In the mid- 1980s a road classification system was introduced because of the road safety and functional implications of mixing different types of traffic on roads. The statements made in this report suggest reversing this to some extent. The implications of this for function, safety and community amenity need to be carefully reviewed and this report has not assessed the implications. For example there are negative economic, functional and environmental implications of reducing and impeding the district distributor transport system which is essential to the flow of goods and people, and will remain so for the foreseeable future despite the intentions for change. However, this does not imply that pedestrian and cycle transport cannot, or should not be incorporated in community planning. In reality, pedestrian transport networks do not need to align with road networks, and often function better if they do not. Exactly how this works in practice is the role of the integrated transport planning, and generally a locality-specific solution is required. The setting of service levels must include road safety.</p>

<p>4.2</p>	<p><b><i>The existing and proposed road system are reviewed with involvement of the community to set level of service for all modes including pedestrians and cyclists. In terms of planning future systems, more priority needs to be shifted to active travel at district level.</i></b></p> <p>See comments above on the setting of service levels. Otherwise supported.</p>
<p>4.3</p>	<p><b><i>Traffic speed is a major psychological barrier to increased walking and cycling. State government can, through newer policy, lower traffic speeds in town centres and residential areas to preferably 30kph or a maximum of 40kph or less in special areas (as has been the case in Melbourne, Britain Colombia, and Europe). This could initially be applied to new developments, home zones or town centres. Scope is made for this in Austroads standards but is often onerous to implement due to required control measures and competing demands. Although local roads are owned by local authorities, MRWA controls all speed limit and traffic signals and must approve reduced speed limits. As an initial step, legislation must be amended to require MRWA to consult with local government and DOP regarding the setting of speed limits.</i></b></p> <p>The current process for setting of speed zones requires Main Roads WA (MRWA) to consult with Local Government and the Police. This has never been an issue and legislative reform to require this would be of limited utility. However, the real issue is to what extent local communities should be empowered to establish the speed limits of their choice. A further concern is the enforcement of those speed limits and what role Local Government could play to achieve good road safety outcomes.</p> <p>Research undertaken during the development of <i>Towards Zero: Road Safety Strategy 2008-2020</i> showed that 5,500 less people would be killed or seriously injured if overall reductions of 10 kph were applied to speed limits across Western Australian. Indeed, lowering speeds has made a significant difference in the past in Western Australia and other jurisdictions. The reduction of the urban default limit from 60 kph to 50 kph led to 20 percent fewer crashes. In absolute terms, this meant 8,448 fewer crashes were reported in the first two years after implementation.</p> <p>This has been an ongoing discussion point between WALGA, MRWA, WA Police and Office of Road Safety. We would suggest this discussion is beyond the scope of this report, but that a review of speed limits on residential/commercial streets could promote more accessible communities.</p> <p>The early provision of public transport services is also likely to have a positive road safety benefit. This is because buses and trains are safer modes of travel than cars and motorcycles, and the fewer people driving cars and riding motorbikes and scooters on the roads, the fewer death and serious injury crashes will occur. Increasing the use of alternative modes of transport also reduces congestion and vehicle emissions and supports sustainability.</p>

4.4	<p><b><i>State government can influence the application of existing guidelines through policy by identifying priorities; specifically that the level of pedestrian priority on major roads is increased. This can be achieved with more at grade crossing points. Level of service measures would need to be used, against which, the satisfactory provision of crossing points could be assessed. Critical level of service thresholds might include number of lanes, vehicle speed, pedestrian associated land use, traffic volume, and length between crossing points.</i></b></p> <p>This will be linked to the availability of funding. See discussion points above. The issue here is not guidelines or policy, but proper strategic planning of networks and the ability of Government to prioritise and fund infrastructure.</p>
4.5	<p><b><i>Recognising individual processes, the DOP should work with WALGA to revise and extend the Perth Parking Policy to implement uniform car parking provision standards across Metropolitan Perth (all local Government Areas). Implementation needs to be monitored to ensure applications are not distorted to allow some areas competitive advantage based on more parking. This can be completed as part of the implementation of Directions 2031 Spatial Framework for Perth and Peel Strategy Action to prepare a Metropolitan Parking Strategy.</i></b></p> <p>Concur with the need to review the Perth Parking strategy and consider it holistically. However, we suggest that a one-size-fits-all Perth-wide approach to parking is not going to be productive. Parking needs to be integrated into integrated transport strategies at a Perth, Regional and District level. It is unlikely Local Government would support a one-size-fits-all prescriptive approach to parking.</p>
4.6	<p><b><i>The DOP, DOT, PTA and MRWA should jointly review policy on the provision of walking and cycling facilities in conjunction with new projects and as part of an integrated upgrade program in existing areas.</i></b></p> <p>Is there a reason Local Government is excluded from this as Local Government is the primary provider of pedestrian and cycling facilities?</p>
4.7	<p><b><i>A common way-finding policy and system (based on the psychology of how people interpret information) needs to be developed incorporating public transport, cycle network signage and pedestrian signage. The system would benefit from employing a range of electronic and print media, information boards, and good signage.</i></b></p> <p>While the principles behind a common way-finding policy and system are sound, there are concerns about the cost of replacing signage to Local Government.</p>
4.8	<p><b><i>The PTA should identify a common measure for public transport accessibility. The measure would need to assess factors such as barriers, distance, service frequency, etc., and would need to be integrated into Transport Assessments.</i></b></p> <p>This recommendation is generally supported. The Public Transport Authority (PTA) has embraced many such innovative transport proposals, and is currently working with the East</p>

	<p>Metropolitan Regional Council (EMRC) to realign public transport services, in response to the information learned, and strategy created as part of the EMRC integrated transport plan, surrounding Great Eastern Highway. This is good example of how the PTA can work with local governments to develop better public transport outcomes.</p> <p>Further to this, we would suggest that in order to promote Accessible Communities and establish them, there may need to be some supplementary funding to PTA to run services which are not financially profitable in the interim, on the basis if the service is not available reliance on cars will not shift.</p> <p>While the recommendation is generally supported, it is difficult to see how a 'common measure' would in practice meet local needs.</p>
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<p>5.1</p>	<p><b><i>The WAPC should work with other Government sectors, industry partners and health authorities to develop training initiatives for local government, Councillors and others on:</i></b></p> <ul style="list-style-type: none"> <li>• <b><i>Pedestrian and cycling design, and network planning; e.g. MRWA Cycle Design course and a common Knowledge Transfer Strategy for local government (including councillors).</i></b></li> <li>• <b><i>Expectations of WAPC vision and policy. (This needs to be linked to better communication);</i></b></li> <li>• <b><i>Benefits and rationale to assist in promotion;</i></b></li> <li>• <b><i>Good planning practice;</i></b></li> <li>• <b><i>Developer advice sessions; and</i></b></li> <li>• <b><i>Introduction to new documents.</i></b></li> </ul> <p>Agreed. The communications and education strategy needs to be wider than local governments and include developers, Government agencies and communities. However, Local Government is already promoting this practice and finding impediments. It may be more useful for the establishment of two way communication and DOP and WALGA to work cooperatively on a continuing basis to develop tailored education, support and promotional programs.</p>
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<p>6.1</p>	<p><b><i>Provide a hearings system for structure plans where a committee hears the conditions set by each agency and by DoP and can instruct other agencies to investigate alternative conditions (within the scope of its act) to address adverse effects of proposed conditions. Establish a sequence of hearings to assist the development of the structure plan or project. Investigate whether the terms of reference for the Infrastructure Coordinating Committee may allow for it to take on this role more actively.</i></b></p> <p>This recommendation is in isolation from the rest of the planning reform process. A hearing system for structure plans, which in theory would allow a co-ordinated approach, will in practice further slow down the approvals process. Integrated Management Plans should not be considered separate from the rest of the planning process.</p>
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6.2	<p><b><i>It is recommended that DOP investigate the possibility of assuming the political risk from local governments of liability for road accidents on approved streets.</i></b></p> <p>This recommendation is simply not implementable. While it is well-intentioned, it seriously misunderstands the roles and responsibilities of governments.</p> <p>Public liability risk is linked to ongoing management and maintenance, not just initial standards, and can not be so easily transferred. What is significant is that local governments become liable for the consequences of poor planning decisions (sometimes made by agencies other than themselves), and often with no means to correct the deficiency. It would be highly desirable for the State Government to guarantee (cash backed) the function of new approaches and correct deficiencies if they occur, but this is unrealistic, and the emphasis needs to be placed on good decision making incorporating the requirements of all involved parties.</p>
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7.1	<p><b><i>DoP should work with WALGA/LG to undertake outcome monitoring on a small number of projects annually. Performance indicators should be identified which reflect key objectives relating to Accessible Communities.</i></b></p> <p>Agreed. This could be monitored through the development of case studies.</p>
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7.2	<p><b><i>Investigate models for greater powers of enforcement relating to planning regulations and planning application conditions.</i></b></p> <p>The planning process has its own enforcement procedures. The objective is to provide sound policies that are consistent with other standards and objectives – in accordance with the aims of <i>Building a Better Planning System</i>.</p> <p>As this is already being considered as one part of the planning reform process and is supported by Local Government, it does not need to be considered outside of that process.</p>
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8.1	<p><b><i>A targeted study should be carried out looking at Austroads, MRWA, Standards Australia and other guidelines to consolidate design guidance to ensure consistency with WA policy for the following:</i></b></p> <ul style="list-style-type: none"> <li><b><i>* Design vehicles;</i></b></li> <li><b><i>* Street tree policy;</i></b></li> <li><b><i>* Kerb radii;</i></b></li> <li><b><i>* Car parking provision;</i></b></li> <li><b><i>* Roundabouts; and</i></b></li> <li><b><i>* Splitter islands.</i></b></li> </ul> <p>This has been completed by IPWEA, funded by DPI and supported by WALGA, is incorporated in the Subdivision Design Standards. Of note, the Austroads and Australian Standards are established by independent bodies of experts, with consultation, and not subject to review or</p>
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	amendment of the WA Government. In terms of priority, Main Roads and Local Government engineering standards are established on the basis of the National standards, sometimes with variation. WAPC would need to approach the national bodies to request a review of those standards, and would assume a degree of liability risk by introducing policies at variance with those standards.
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<b>9.1</b>	<b><i>WAPC should establish a common interface for all Accessible Community policy ensuring that policies are not contradictory. In particular, district level planning needs to be better communicated to integrate with local level planning.</i></b>  Agreed.
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<b>10.1</b>	<b><i>Find an alternative to Accessible Communities.</i></b>  Agreed. The term 'Accessible Communities' can cause some confusion, however, it is not to disregard the underlying premise that improved access for people with disabilities will benefit the wider community.
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<b>10.2</b>	<b><i>Adopt active travel as a popular term.</i></b>  Agreed.
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