

31 July 2015

Project Manager
Perth and Peel @ 3.5million
Department of Planning
Locked Bag 2506
PERTH WA 6001

Dear Sir/Madam,

Draft Perth and Peel@3.5million

Please see below the Committee for Perth's response to your request for comments on the *Draft Perth and Peel @ 3.5million* document.

The Committee for Perth is the leading think tank focused on the future growth and development of the Perth and Peel regions. We take an evidence based approach to examining and advocating for action to reshape, reform and revitalise the metropolitan region in order for it to remain highly liveable.

This submission has been prepared by the Committee for Perth with assistance from members of our Reshaping Working Group. In our response that follows we have relied on our previous research, *Towards a Bright Future* which outlined outcomes for Perth if it continued on a 'Business as Usual Scenario' versus the articulation of a 'Bright Future Scenario'. As part of this report we made 20 recommendations for Government to action, which we believe align closely with many of the strategies in the *Draft Perth and Peel @ 3.5million* document. In our submission we address some of the key issues Perth and Peel face as a region growing to a population of 3.5 million people.

The government's vision document and sub-regional structure plans identify significant strategic priorities that we believe are imperative to creating a Perth and Peel region which will deliver opportunities, lifestyle choices and amenity for its residents as it grows to accommodate 3.5 million people. By acknowledging the challenges Perth faces as the population continues to increase, the document also provides an evidence base for the specific strategies identified to address them.

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Our work is fully funded by our members and foundation partners. We acknowledge:



A complete list of current members is available at www.committeeforperth.com.au

We congratulate the Western Australian Planning Commission and the Department of Planning on preparing the Draft Perth and Peel @ 3.5million document and supporting frameworks for implementation.

Should you require any additional commentary, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M Fulker', written in a cursive style.

Marion Fulker
CEO

Comments - Draft Perth and Peel@3.5million

The comments provided below are in response to specific concerns or provide feedback in regard to certain sections of either the over-arching *Perth and Peel @ 3.5million* report or a specific Sub-regional Planning Framework.

Over-arching Perth and Peel@3.5million

Section 3 Perth 2050 – The Need for Change

The Committee for Perth (the Committee) agrees with the challenges described (pages 16 & 17) as the Perth and Peel region reaches a population of 3.5 million. However we also believe that it is imperative that the associated planning frameworks identify real implementation strategies to ensure that the goals outlined here are achieved. Some of the key issues that the Committee believes should be given priority include improving current density infill developments, achieving a connected city, improving housing diversity and affordability, and reducing car dependency.

Section 4 Growth Patterns – Our Choice

The *Draft Perth and Peel @ 3.5 million* document could be strengthened and be more exacting through the use of more definitive language. For example on page 22 the statement “*They demonstrate where development **could** be located to help achieve the target of 47 per cent infill and promote the connectivity...*” could be re-worded to: “*They demonstrate where development **should or will** be located...*” The use of definitive language would strengthen the capacity of the document to provide a clear framework for the delivery of strategic priorities.

It could also assist in providing certainty and finality to residents, developers and local governments regarding the policy and strategies the state government will implement to accommodate current and future population growth.

Page 25 of this section shows a proposed spatial plan for Perth and Peel incorporating existing and proposed rail networks. The Committee is concerned that the “*Passenger Rail – Potential*” areas shown on the map (central north line and inland of Peel line) are not clearly defined nor do they provide any real connections between major areas of development or between major transport nodes. In order to provide the substantial network of public transport that a region of 3.5 million will require, the Committee believes that these potential areas of passenger rail should be clearly defined and planned for with consideration of population densities into the future. Additionally, providing future suburban rail linkages to the CBD is an important consideration for such services.

Section 6 Economy

Paragraph four of this section (page 33) outlines an importance for Perth and Peel to maintain and expand its role as an agricultural and resources-related economy. Given a history of varying fortunes of sectors, the Committee believes that the strategy should place a greater focus on economic diversification and the development of an innovation and knowledge based economy. From an urban and transport planning perspective this should include the identification of activity centres that have the capacity to acts as hubs for knowledge and innovation industries.

Section 8.4 Adapting to Our Climate Change

One key concern with the document (page 54) is that it outlines Perth as possessing a “strong public transit infrastructure” which will help towards combatting fossil fuel production. Our view is that this is an overstatement. The 2015 Australian Infrastructure Audit conducted by Infrastructure Australia highlights very substantial challenges regarding the capacity of Perth’s transport and public transport infrastructure including currently funded projects to accommodate future growth. The audit predicts that in the absence of new major transport investment Perth will suffer from the worst peak congestion delay costs in Australia.

It is also evident that, despite increases in public transport patronage in the region since the 1990s, Perth remains heavily car dependent and is well behind other major Australian capitals, such as Sydney and Melbourne in delivering a multi-modal future. Already the proportion of people who travelled to work by public transport in Greater Perth is less than half that of Sydney and is significantly lower than Melbourne and Brisbane.

The Committee strongly believes that major investment in an integrated public transport system is urgently needed to reduce fossil fuel reliance and that priorities for this investment should be identified through fully integrated land use and transport plans.

In this regard it is imperative that Perth @ 3.5 million states the need for integrated land use and transport planning for a more sustainable future and that this is reflected in the sub-regional structure plans and any associated corridor plans in the region.

Section 9 Implementation

The document identifies a number of aspirations/actions in the Implementation Strategies table. However these are not yet clearly defined and further work is needed to identify the *how* of each objective.

For example the objective “promote the benefits of higher density living among Perth and Peel residents, to generate a demand to which developers will respond” on page 63 of the document is an important step in the process of achieving residential density targets. This could be further strengthened by outlining specific strategies and actions of how this will be promoted to residents. For example, “promote the benefits of higher density living by educating residents through community web pages/workshops/consultation sessions that show examples of density done well and an increased level of amenity”.

In promoting the benefits of higher density living, it is important to include the economic advantages that a more consolidated urban form can provide. These include a greater population base to support local business, potentially further promoting and attracting a greater number of businesses into the area. Additionally, increasing density also has the potential to reduce the economic costs of congestion if density is facilitated through necessary provision of public transport systems.

Central Sub-regional Planning Framework

Section 4.3 Corridors

The transition of key transport corridors into multi-functional corridors that allow for efficient movement and high amenity must be carefully planned and linked with transport and public transport planning and investment in order to avoid a number of potential adverse impacts. This could include increased traffic congestion from residents of high

density development along these corridors attempting to enter from key convergence points.

Therefore to ensure such corridors are successfully planned and developed, high quality, integrated land use and transport plans for each corridor will be needed. This will require the finalisation of public transport plans for Perth, including a final decision regarding the progression of the MAX light rail project and any proposed express or bus rapid transit routes, accompanied by long term funding commitments.

In addition the Department of Transport's *Central Area Transport Plan 2025* will need to be completed, to ensure that both the final *Central Sub-regional Planning Framework* and the *Central Area Transport Plan 2025* are integrated and complimentary.

Section 5.1 Infill Housing Targets

In August 2010 the Department of Planning set a target of 47 per cent of residential dwellings to be provided through infill development as in *Directions 2031*. Despite this, the most recent report card which tracks progress towards these targets shows that 50% of local governments are lagging behind in achieving their respective residential infill targets¹. In order to ensure that these targets are met, we believe that mechanisms should be put into place so that each Local Government Area makes real progress in achieving the targets set by the WAPC.

The Committee is aware that, historically, infill projects in the middle and inner rings have proved to be problematic, often due to a combination of factors which have included planning, ownership, infrastructure, and approval constraints as well as public and local authority concerns and opposition.

These constraints should be managed and mitigated if infill targets are to be met. To do this there should be development of a more sophisticated profile of the overall amount, distribution, scale and quality of infill/brownfield land sites currently appropriate for redevelopment within each local council area. This could be achieved by development of a register of key locations suitable for higher density infill development and the preparation of visions and structure plans for these areas in co-operation with local authorities and through extensive community consultation.

It is our view that the consultation and planning undertaken by the Department of Planning (on behalf of the Western Australian Planning Commission) in conjunction with the Cities of Melville and South Perth at Canning Bridge provide a successful example of this approach, as does the Metropolitan Redevelopment Authority's Scarborough project. These projects have set a precedent for what could be achieved to enable high quality infill development in numerous strategic locations around the metropolitan region.

Section 6 Implementation

When comparing the draft *Central Sub-regional Planning Framework* with those of the *North-West, North-East and South Metropolitan Sub-regional Planning Frameworks* clear differences are observed between the implementation sections. While the former mentioned frameworks each contain a table of Implementation Actions, the Central document does not. This gives cause for concern, as the local governments in this area may not be held accountable to achieve the infill targets set out in page 41. Delegation of specific

¹ http://www.planning.wa.gov.au/dop_pub_pdf/Directions_2014_Report_Card.pdf

hard targets to the responsible authority and clearly defining this throughout the document is crucial in order for the strategies to be met.

The Committee therefore recommends that the *Central Sub-regional Planning Framework* includes a table for Implementation Actions, as are incorporated in each of the three other Draft Frameworks. In addition, this table must identify those to be held accountable for achieving real actions and targets provided for in the overall vision for Perth, and provide for consequences of inaction with respect to these.

South Metropolitan Peel Sub-regional Planning Framework

Section 3.3 Economy and Employment

The Committee agrees with the priority that the Department of Planning and WAPC places on increasing the amount of employment self-sufficiency in outer Perth and Peel regions.

In order to achieve this we believe that the strategies and actions for implementation must be clearly defined and outlined. Under the Cockburn Activity Centres heading (page 27) an aim is “to increase the diversity and mix of land use within this centre” and attract anchor businesses in healthcare and social assistance. In order to strengthen this objective the Committee recommends including strategies and actions for attracting anchor tenants, such as offering lowered rents or increasing plot ratio’s to attract certain types of business.

Section 4 Implementation

In addition to the above comments, the implementation actions outlined in Table 4 (page 49) with regards to economy and employment should be strengthened. The strategic direction/priority states: “improve employment self-sufficiency to reach target” and should be accompanied by a number of clearly defined actions with responsibility for each action being allocated to an appropriate state, local government or other organisation.