

26 August 2009

Directions 2031 Public Submission
Western Australian Planning Commission
469 Wellington Street
PERTH WA 6000

Dear Sir,

Directions 2031 – Draft Spatial Framework for Perth and Peel

Name: Marion Fulker, CEO
Organisation: Committee for Perth
Address: 996 Hay Street, PERTH WA 6000
Interest: Community and Business Representation

We respond to your request for comments on *Directions 2031 – Draft Spatial Framework for Perth and Peel*.

The Committee for Perth is an apolitical business sector think tank whose focus is to actively improve the liveability of Perth by providing visionary ideas and solutions that drive the sustainable development of Perth as a metropolitan area of rich cultural diversity, economic prosperity and world-class amenity. As such, we focus on all areas of life in the Perth metropolitan region with a view to developing solutions for topical issues.

This submission was prepared for the Committee for Perth by members of the Reshaping Working Group which has responsibility for developing initiatives, advocacy and monitoring programs in order to champion our vision related to sustainability, city making projects, public spaces and transportation.

This submission seeks to address some of the key questions arising from a review of the *Directions 2031*. We would like the following comments to be considered in the preparation of the final document.

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

Yours sincerely

Marion Fulker
CEO

SECTION 2 – Planning for the Future

Directions 2031 seems predicated on trying to foster a greater degree of planning pragmatism, flexibility and certainty in relation to strategic and operational planning philosophy and practice. This approach is to be welcomed and the strategic leadership now in place within the Department of Planning (DoP) and the West Australian Planning Commission (WAPC) should hopefully see the evolution of a move away from ‘regulatory capture’ to a more dynamic and creative planning culture.

It is also recognised that *Directions 2031* is a meta-strategic policy document that speaks to the development of a hierarchy of other strategic and operational plans operating at different spatial scales. Again, this highlights the emergence of a planning framework that seeks to create planning certainty. A major concern is whether or not the DoP and local councils will be sufficiently staffed and resourced to undertake the various research and policy tasks associated with not just creating these various plans but implementing, monitoring and updating them over time. In other words, there needs to be some analysis of the cost of moving to, and establishing, the newly proposed planning framework outlined in *Directions 2031*.

In order to bring a greater sense of rigour and reality to *Directions 2031*, there is a need for detailed and up-to-date analysis of future demographic changes, economic activity, economic growth, population scenarios, community aspirations, needs and wants and policy changes (e.g. local government reform) that relate to planning aspirations and intent. There seems to be an underlying reliance within the document on research conducted as part of Network City. That research was wide-ranging and extensive, it is arguably the case that this research is now effectively out of date and is not an appropriate basis on which to formulate policy.

SECTION 3 – Vision and Key Themes

The six key themes of the document are supported and welcomed.

The major trend in the long-term economic sustainability of communities remains in **employment**. Until recently there has been minimal study and research on the creation and promotion of employment within communities. Employment is the cornerstone of liveable communities. Detailed employment strategies must be created in the consideration of new development, which further reinforces the importance of a successful infill program that is currently not yet in place and requires major resource increases.

Historically, greenfield development has provided around 25% of local employment. This is not sufficient for the long-term sustainability of outer suburban communities. To ensure a more appropriate level of local employment, targets of over 60% should be achieved. Infill development and successful infill development is vital in achieving this outcome.

There is a need for *Directions 2031* to be much clearer and more explicit in its policy aspirations/intent in relation to making Perth a more accessible city. The public transport system within Perth currently suffers from an increasingly tarnished image of being an

unfriendly, unsafe and inconvenient mode of transport. Furthermore, unless the range of public transport options increases, the DoP will struggle to realise its 47% in-fill target. To this end, an outline transit strategy should be developed and tabled to highlight and promote meaningful policy discussion on the role of public and private transit in creating a more liveable, vibrant and efficient city.

In relation to public transport, there is a need to enhance the choice of transport modes open to both residents and visitors to Perth. Consider examining the impact of expansion of the CAT System within the CBD and its immediate surrounds as well as physical and electronic traffic management systems. Furthermore, the issue of light rail needs to be included in any such transit strategy. To again promote the themes of this document, a detailed and real transport strategy must be introduced to ensure a city of significance can be grown upon.

SECTION 4 – Scenarios for Growth

Population Projections to 2031

To ensure a living and flexible document is established and to eliminate the risk of incorrect projections, time periods should be defined. Time periods of say five years should be implemented in which to complete an audit and provide updates on changes to demographics, market trends and economic progression that all have major impacts on population projections. This will ensure a moving document that ensures availability of developable land to allow appropriate housing supply and affordability.

Infill Projections

Directions 2031 targets a density yield of 15du/h, which, based on dialogue within the development industry, will provide challenging targets. Furthermore, whilst the infill target of 47% of new dwellings to be built within the inner and middle rings provides a degree of certainty in terms of planning intent, *Directions 2031* provides little in the way of suggesting what planning and other policy mechanisms might be used to realise this target. There is a need for the DoP to canvass a range of policy scenarios that speak to this 47% target.

It is understood that currently 35% of housing is being achieved by Infill development, however theoretically this target becomes more challenging as more infill sites are developed.

As read in the Jan Ghel report of 2009, Perth has approximately 1400 people living within its CBD as opposed to approximately 10,000 in both Sydney and Melbourne. Whilst Perth remains an immature property market compared to Sydney and Melbourne, the discrepancy between the two far outweighs the difference between the two markets and their amenity. Attractive and liveable CBDs not only promote living within, they promote the ability to provide development opportunity in inner and middle ring suburbs outside of the CBD. A vibrant “all day/all night” CBD is vital in attracting infill development through the inner and middle rings.

Historically infill projects in the middle and inner rings have provided development challenges in Perth due to a combination of factors, including:

- Time delays of planning approvals (lack of resources – too many local councils);

- Unsatisfactory planning approvals;
- Strict and inflexible planning constraints;
- Public opposition;
- Council opposition (authority granted to councillors – should sit with planning officers) and
- Infill Stigma

These constraints should be managed and improved upon if infill targets are to be met. Possible ways forward include:

- developing a more sophisticated profile of the overall amount, distribution, scale and quality of infill/brownfield land sites currently available within each local council area. It is suggested that a possible way forward would be to develop some kind of classification – e.g. primary, secondary and tertiary – based on market attractiveness and potential. A joint taskforce made up of local councils and DoP should be implemented to undertake this review.
- following on from the above, DoP should form strategic partnerships with those local councils (post amalgamation) in favour of developing planning policies that actively encourage the development of TODs and other higher density housing and mixed-used developments within appropriate locations within their jurisdictions.
- executive leadership in the planning approval process is needed in order to avoid unnecessary delays and increasing development costs on projects where a minority of active community members and/or locally elected councillors or politicians hold higher density developments to ‘ransom’, especially where land has been zoned for higher density development. Whilst there will invariably be cases where higher density development will/may be inappropriate, the aforementioned need to conduct a more sophisticated profile of infill sites. The formation of strategic alliances with councils should help ensure that higher density development occurs in the most appropriate locations. DoP and local councils also need to articulate more clearly and effectively what the ‘public interest’ is. It does not automatically mean that only ‘local’ community voices have the right to vote or veto development proposals. The public interest should be about trying to meet the needs and aspirations of the wider community both now and into the future.

Density – 15du/h

Again, a challenging target, however an appropriate approvals process will aid in achieving this aim. Infill housing as desired in Liveable Neighbourhoods has been difficult to progress in Perth for the reasons stated previously, however it has the environment, amenity and lifestyle for this aim to flourish. In more mature markets infill development generally equates to affordable housing and is seen as a very acceptable housing choice. To fast track this aim an appropriate infill strategy should be implemented to allow and promote infill housing and affordable housing choice.

To maximise the opportunities through which to achieve this target, the constraints must be fully understood, which currently are not. There are various forms of incentive to promote

such development and make them more viable. They range from stamp duty exemptions, rate holidays, shared equity schemes, plot ratio exemptions for public amenity and affordable housing. Resources are required as seen above to ensure the promotion of infill housing, otherwise both density and infill targets will fall very short.

SECTION 5 – Structural Elements

Movement and Transport Network – Refer to comments under Section 3 - Vision and Key Themes.

SECTION 7 – Implementation

Whilst reference is made to building a more efficient planning system, nothing is said about the on-going local government reforms. In light of the role that local governments play in the planning process, these reforms warrant further discussion. It is acknowledged that DoP are in the process of engaging with local councils, particularly in relation to infill development scenarios so it is heartening to know that the local government issue has not been completely overlooked. This relationship is vital to ensure clarity, which will allow infill targets to be met.

Resourcing has and undoubtedly will remain a key component of the success of this document. Priorities that are mentioned have unfortunately in some cases been prioritised for some years without notable achievement or completion. DoP has undeniably been under resourced for some time and this has resulted in, at times, an inefficient planning process. If appropriate resources are not available, it would be prudent to provide critical items and priority initiatives to be given to the private planning sector to aid in providing a collaborative approach to planning solutions. This will ensure a timely and efficient planning process that will not only improve the development of the city, but aid in reducing timeframes that will greatly improve housing affordability.