

26 November 2010

Outer Metropolitan Perth and Peel Sub-Regional Strategy Public Submission
Western Australian Planning Commission
469 Wellington Street
PERTH WA 6000

Dear Sir

Outer Metropolitan Perth and Peel Sub-Regional Strategy

Name: Marion Fulker, CEO
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Interest: Community and Business Representation

This submission has been prepared by the Committee for Perth (CFP) to provide comment on the Outer Metropolitan Perth Sub-Regional Strategy.

The CFP congratulates the Department of Planning for preparing the draft strategy in a timely manner. The document provides an excellent compendium of information about the outer metropolitan areas of Perth, their demographic profile, current employment, infrastructure capacity and potential for urban expansion.

This is very worthwhile information however what the document does not appear to do effectively is link this information with the strategies and actions or the targets identified in Directions 2031. Rather, many of the strategies and actions appear to be more relevant to the central sub-regional strategy because they are not justified or considered in detail within the text of the document. For example, the actions listed under Strategies 1 and 2 are largely aimed at addressing infill and higher density development; and providing a range of housing types, however the infill target for the Outer Metropolitan Region is not significant and, with the exception of the Peel region, young families make up a higher proportion of household types, with fewer young adults and older people. The actions for these areas would be more relevant if they reflected this and were area specific to respond to the demographic make-up and associated housing, infrastructure and service needs of the areas of the outer sub-region.

The document also has a strong focus on outlining the detail of the draft Urban Expansion Management Program which, while a very useful program, is a land supply program rather than a strategic plan. It would therefore sit more comfortably as a separate document rather than within this strategy.

The draft Urban Expansion Management Program also fails to align with Direction 2031 targets, which is very concerning. While there are actions under Strategy 4 which promote the Directions

2031 targets, the content of the strategy document itself is not strongly aligned with them. The focus of the strategy appears to be more on ensuring the long term greenfield land supply at current development densities rather than Directions 2031 target densities and this is disappointing. The format of the strategy is different to the format of the Central Sub Region Strategy and it would be easier to read and understand the direction of the strategies if they were more aligned. The purpose of the document as a strategy would also be stronger and more clear if the strategies and actions were positioned at the front of the document.

It would be unfortunate for this opportunity to develop an aspirational strategy for Perth's outer areas was missed. The outer areas can be the most disadvantaged in terms of access to transportation, employment, services and facilities. They are also often areas which house households experiencing significant financial stress, and as Perth grows there is potential for these disadvantages to become more pronounced.

It is important that this strategy addresses all of these issues and identifies appropriate actions for the short, medium and long term which are specific to the areas identified within the outer sub-region. It is also imperative that the initiatives identified in the strategy including the area of land identified in the urban expansion areas, are consistent with the targets identified in Directions 2031.

Detailed comments on particular themes are attached.

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

Yours sincerely



Marion Fulker
CEO

Outer Metropolitan Perth and Peel Sub-Regional Strategy

The Committee would like to make the following points in regard to the strategy:

Population Projections

Directions 2031 and the sub regional strategy have been prepared using the WAPC growth projections prepared as a part of WA Tomorrow (2005). These appear to be the most conservative current estimates and are significantly more conservative than possible high growth scenarios identified by the Australian Bureau of Statistics.

Urban Expansion Program

The establishment of the Urban Expansion Management Program is supported. This program has the potential to provide increased transparency and certainty to the community, land owners and developers in regard to both the land required for urban expansion and the timing of land release. However we do have concern about the lack of alignment between the draft Urban Expansion Program and Directions 2031 targets. These concerns are outlined below.

Determining land required for urban expansion

Why does the strategy assume a business as usual approach of 10 dwellings per hectare? We do not see any reason for this unless the Directions 2031 targets are not going to be actively implemented. The target of 15 dwellings per hectare may be challenging however it is the role of strategies to be aspirational and for associated strategies and planning documents to incorporate these targets and make change happen.

Urban Expansion Program Scenario Planning and Draft Urban Expansion Program

The scenario planning assumptions are not clearly articulated in the strategy document. It is important that strategy documents are clear and can be understood by all sectors of the community.

The scenario planning for this draft Urban Expansion Program appears to have been conducted taking a longer term approach (to 2050) while Directions 2031 and the strategy for the Central Sub Region take a 20 year planning approach. While a longer term approach is preferred it is unclear why the strategy documents and processes are not more aligned.

It is unclear why the draft Urban Expansion Program is not based on the Directions 2031 targets. Given that Directions 2031 already identifies targets for growth within the sub regions, the role of this strategy should be to indicate how these targets will be achieved through development in the outer sub region. Additional scenario planning is confusing and no reason has been given for taking this approach.

It is assumed that this approach may have been taken to enable flexibility however this could be achieved simply by applying the Directions 2031 targets and then providing for a contingency; while allowing for regular reviews of land uptake and requirements.

It is also unclear why the draft Urban Expansion Plan identifies 32,300ha of total land supply when the connected city approach, which has been identified as the strategic direction for Perth, would require 20,300ha? A 59% contingency seems extremely large and unnecessary and questions the purpose of this strategy in implementing the Directions 2031 targets.

Economic Development and Employment Growth

The actions identified to facilitate a more balanced distribution of employment across the metropolitan region are welcomed however the issue of economic development and employment growth is not addressed in detail that is sufficient given the importance of the issue to the future economic and social health of Perth's outer areas. This strategy should be the leading document for assessing employment need in the outer regions and should identify specific opportunities and actions to meet this need.

The proposed preparation of an economic development and employment strategy is welcomed however rather than sit as a separate strategy document, the actions and targets identified could be integrated into the final version of this document to provide a single integrated strategy for the sub-region. This would strengthen the role of this document as the primary strategy to implement Directions 2031 targets in the outer sub-region.

Transportation

The provision of public transportation to Perth's outer areas is extremely important to enable long term accessibility and reduce the potential for outer areas to become suburbs of economic disadvantage. We therefore urge the state government to ensure appropriate provision of public transportation to the outer sub region. It would also be appropriate for the final version of this strategy to incorporate plans for public transport provision that are consistent with the transportation plan currently being developed and, consistent with this, to identify nodes suitable for transit oriented development.

Social Infrastructure

It would be appropriate for this strategy to identify social infrastructure needs and deficiencies and incorporate specific actions to address these needs in existing urban areas as well as new urban development in the outer sub region. The strategy identifies a need for social infrastructure but fails to identify areas of most need or specific actions to be undertaken to ensure that this need is addressed.