

**DRAFT PERTH AND PEEL @ 3.5MILLION STRATEGY:
CENTRAL SUB-REGIONAL FRAMEWORK**

**City of Stirling Submission
4 August 2015**

OVERVIEW

The City supports the strategic direction and principles of urban consolidation within Activity Centres and the creation of Activity Corridors. The City also recognises the difficult and challenging responsibility the Western Planning Commission has in planning for the future of the metropolitan area. However, the City does not support the Perth and Peel @3.5million Strategy and Frameworks in their current form as they do not:

- appear to be integrated with a metropolitan transport strategy;
- recognise the importance of 'infrastructure-lead-development' to achieve their aims;
- contain evidence of the analyses necessary to support many of the strategies; and
- adequately address implementation.

It is the City's view that the Strategy should not be focused on capacity, but rather on creating the conditions for high quality urban environments, with density focused in appropriate locations.

A) General Comments:

1. Infrastructure for an additional 1.5 million people

1.1 The 'Perth and Peel @ 3.5million Strategy' document and the 'Sub-Regional Planning Framework' document do not appear to be based upon analysis of the infrastructure needed to accommodate the additional 1.5 million people in the Metropolitan Region. There is minimal mention of any new infrastructure in the central sub-region to accommodate an additional 400,000 people.

1.2 It is recommended that the level of detailed information required prior to this Strategy being progressed should include the following:

- i. Transport modelling identifying what impact the population growth will have on the existing network;
- ii. Agreement with Local Government on future transport mode splits;
- iii. Identifying with Local Government new rail lines;
- iv. Identifying with Local Government new light rail routes;
- v. Identifying with Local Government new bus priority routes;
- vi. Identifying the form and function of each corridor;

- vii. Identifying what key road upgrades are required;
- viii. Number of and general location of new School Sites;
- ix. Number of, and general location of new substations, sewer treatment plants and water treatment plants or upgrades to existing plants including timing;
- x. Amount of active and passive Public Open Space required for the additional population and its general location by suburb and / or Local Government;
- xi. Identifying possible new activity centres; and
- xii. Identifying which activity centres may need to be elevated within the hierarchy.

1.3 The City of Stirling is concerned that this analysis will be left to Local Government to complete. It is the City's view this analysis requires leadership and coordination by the Western Australian Planning Commission but with significant input by Local Governments and other key stakeholders.

1.4 The City of Stirling requests that the Strategy not be adopted until this analysis and consultation with Local Government and other stakeholders is undertaken and the outcomes incorporated into an updated Strategy document.

2. Status of Perth and Peel @3.5million Strategy and relationship to other Strategies

2.1 It is not clear where the Perth and Peel @3.5million Strategy documents sit in relation to existing released Strategies. In addition, the opportunity should be taken to consolidate the 80 or so State Planning documents that relate to metropolitan planning, some of which conflict with each other. Below is a summary of the major Strategies prepared over the last 5 years:

3. Directions 2031

3.1 There is uncertainty as to where the draft Perth and Peel @3.5million Strategy Sub-Regional Frameworks sit in relation to the previous sub-regional Strategies (Department of Planning/Western Australian Planning Commission 2010), which set out growth targets and areas for Perth. It is unclear as to whether the Perth and Peel @3.5million Strategy documents and framework replace/succeed the previous Strategy or works in partnership with the previous sub-regional Strategies.

3.2 The Perth and Peel @3.5million Strategy requires modification to clarify which Strategy and what targets are to be adhered to.

4. Draft Public Transport Master Plan

4.1 The proposed public transport infrastructure identified within the draft Public Masterplan released for public comment in 2011 is not referenced in the Perth and Peel @3.5million Strategy (including key elements like the MAX light rail). In addition the Perth and Peel @3.5million Strategy makes numerous references to the requirement for improved public transport to enable urban consolidation, but has no long term public transport plan.

The City of Stirling does not support the Strategy in the absence of either a new public transport plan or inclusion of the previously advertised draft Perth Public Transport Master Plan. It is the City of Stirling's view that the Perth and Peel @3.5million Strategy should not be adopted until this omission is addressed.

5. Moving People Strategy

5.1 The City of Stirling participated in some limited development of the Moving People Strategy in 2013. This Strategy (being developed by the Department of Transport) was supposed to be an overarching State Government transport strategy that guided the future of transport in the Perth Metropolitan Area, including freight, public transport, roads, cycling and pedestrians.

5.2 A metropolitan transport plan is required to inform and be integrated with the Perth and Peel @3.5million Strategy before it could be supported by the City of Stirling.

6. Perth and Peel @3.5million Strategy

6.1 This Strategy is a high level strategy that does not include detail on how to fund, deliver and implement urban consolidation and it appears that Local Government will be required to fill in much of the detail. However, this is likely to be problematic where there are many local governments in the metropolitan area. An example would be the inner northern area of the central sub region. This area contains five (5) of the major activity corridors entering the CBD from the north and control is spread over four (4) local authorities with little coordination between local authorities or state agencies on what these corridors should be. This issue is replicated in many areas of the central sub-region.

6.2 It is recommended that this strategy should either contain all of the necessary information, or district level structure plans be prepared by the Western Australian Planning Commission to ensure coordination between local governments and State Government agencies. There a number of unresolved issues that could have significant unintended consequences should the Strategy documents be afforded statutory weight.

7. Contents of the Strategies

7.1 The Perth and Peel @3.5 million Strategy and Sub-Regional Framework are aimed towards a number of outcomes which are difficult to understand. These include:

- i. A new railway line, shown in the state forest areas of north western Perth linking back to Reid Highway near Malaga, has no connection back to the existing rail lines and appears not to be serving any communities. It is also not included within the draft Public Transport Plan;
- ii. There appears to be a lack of identified future growth in the coastal western and north western areas of the Metropolitan Area;

- iii. Urban consolidation areas have been identified around some existing train stations in Stirling, including Mt. Lawley where there are heritage controls in place (which limit the ability for urban consolidation). However, other train stations have not been identified (such as Warwick Station) where there may be fewer constraints to future urban consolidation;
- iv. The City of Stirling has been identified to accommodate an additional 60,400 dwellings, of which 75% needs to be accommodated within the City's Activity Centres or along corridors. There appears to have been little analysis on where this growth should go within the City of Stirling. It should be noted that this level of growth may be accommodated within the City's existing residential zoned areas;
- v. The Strategy focuses on 'capacity' issues of areas to accommodate growth, however in the City of Stirling's view that the Strategy should focus on infrastructure led urban consolidation. For example, investment in light rail will encourage private investment in residential and mixed use development in key locations like activity centres and activity corridors; and
- vi. No specific section on transport has been provided in either of the documents (refer earlier comments in Part 2).

8. Implementation of Strategy

8.1 The Perth and Peel @3.5million Strategy and sub-regional framework both contain sections on implementation. It is the City's view that these sections need to be further developed.

9. Transport and Service Utility Funding and Delivery

9.1 There is no discussion in the Strategy about what level of transport and service utility infrastructure is required. This infrastructure is necessary to bring about urban consolidation. Without a clear plan to show how this infrastructure will be delivered, it will be difficult for the Strategy to be implemented. Infrastructure such as light rail has been shown to stimulate private sector investment in and along key activity centres and corridors.

9.2 The City (working collaboratively with the Commission) has recently completed detailed planning for urban consolidation around several major activity centres and has found that without significant State Government funding for critical transport, water, sewerage and electricity infrastructure, limited amounts of urban consolidation will occur.

9.3 The City (working collaboratively with the Commission) has also investigated some of the following funding options that need to be investigated and implemented to enable the delivery of high quality urban consolidation in centres and along corridors, including but not limited to:

- i. Parking levies for major activity centres to fund public transport (based on the Perth Parking Act). The City of Stirling is currently investigating this option for Stirling City Centre;
- ii. Parking Levies for predominantly single use centres and car based shopping mall expansions;
- iii. Metropolitan Public Transport Levy (Gold Coast Model);

- iv. Wider tax base for the Metropolitan Improvement Tax (on all properties) to enable funding of public transport and other critical infrastructure through the use of Improvement Plans;
- v. Value Capture through developer contributions on key activity corridors to help fund public transport (investigated by the City of Stirling for the Scarborough Beach Road Activity Corridor study); and
- vi. Other funding models used in Australia and overseas to deliver these outcomes.

9.4 The City of Stirling considers that the adoption of the Strategy should be delayed until this work is completed and included in the Strategy.

10. The Planning System

10.1 It is considered that to achieve the goals of this document and the subsequent framework, the current planning system needs to be comprehensively reviewed. The content of this Strategy and Framework are similar to previous strategies adopted over the last two decades and yet Perth still has not achieved the target of close to 50% urban consolidation. With the exception of the CBD, where significant public investment has occurred, Perth's limited urban consolidation has mostly occurred through development in the back yards of its garden suburbs and not within activity centres or along activity corridors.

10.2 A comprehensive review of not only the policies that guide urban development, but also the implementation and funding mechanisms that currently favour continued urban sprawl, is required. This includes:

- i. Alignment of planning and transport strategies;
- ii. Review of the Metropolitan Region Improvement Fund expenditure, to better ensure appropriate support for urban consolidation within activity centres and along corridors;
- iii. Greater transparency in public decision making to improve the accountability of decisions in achieving public policy outcomes;
- iv. Identifying and implementing new funding models to facilitate the provision of Public Transport; and
- v. Replacement of the Residential Design Codes - Multiple Dwelling provisions with a new Form Based Code that ensures high quality urban design outcomes.

11. Governance

11.1 Urban consolidation along corridors or within and around major activity centres requires significant investment in transport and service utility infrastructure. Historically, within Perth and Peel there has been very limited urban consolidation along corridors or around activity centres partly due to a lack of a clear governance arrangement for the delivery of critical infrastructure. The majority of examples of where this has occurred are where redevelopment authorities have led the delivery of projects. However, these have only been used where projects have significant government owned land. Most major activity centres contain large amounts of privately owned land.

- 11.2 Utilising redevelopment authorities to deliver transit or other similar governance models is required to achieve the urban consolidation needed to meet the population increases facing Perth where there are large amounts of government owned land and a need for new transit along corridors and to centres. This would require a significant increase in the number of projects that redevelopment authorities are involved in and possibly a review of their powers. This model is not mentioned within the documents along with other governance models that are needed, given the complexity of brownfield redevelopment required to achieve urban consolidation.
- 11.3 Where centres and corridors contain mostly privately owned land a new delivery and governance model is required that brings together transit delivery, new funding models, purchasing of strategic sites for redevelopment and incentives for the private sector to deliver infrastructure. This is likely to require a strong collaborative approach between Local and State Government, the private sector and the local community and increased intervention by State Government to facilitate the required outcomes.
- 11.4 At times there appears to be a lack of shared objectives and whole of government approach between State Government departments, particularly transport agencies in the delivery of infrastructure. This is critical regarding the relationship between transport, land use and urban consolidation. Currently, transport funding is focussed on construction of more roads in the outer suburbs which will ensure that the rate of car use will be maintained in the foreseeable future. The result will be that the transport network, focusing on private vehicle movement, will remain a barrier to activity centre and activity corridor urban intensification. The Strategy and Framework need to include proposals for the review of existing governance models to address this concern.
- 11.5 Governance around roads is a particular issue that need to be addressed. The City recommends that different road classification in the MRS for Activity Corridors is considered to facilitate integrated planning and transport outcomes.
- 11.6 The City of Stirling recommends that governance models are reviewed and improved as part of the implementation of the Framework. Adoption of the Strategy should be delayed until appropriate governance models are identified and priority projects identified to deliver urban consolidation along priority corridors and around priority activity centres.

B) Impact on the City Of Stirling:

12. Activity Centres

12.1 The City has already been involved with several key activity centre redevelopments, including the Stirling, Mirrabooka and Glendalough Activity centres. However, this Framework only references existing projects. No further future activity centres have been identified, or how the existing centres may change such as, the elevation of an existing District, Regional or Neighbourhood Centre.

12.2 International evidence shows that that the expansion of predominantly single use centres will detrimentally impact on urban mixed use centre development, the potential of areas around train stations and transport interchanges, travel patterns, local and neighbourhood centres and the viability of urban consolidation projects. Strategies to ensure that the retail development demand within Perth is used to facilitate urban consolidation are important and need to be recognised in both the Strategy and Framework.

13. Activity Corridors

13.1 The City of Stirling is concerned that the modelling and research needed to assess the suitability of the corridors identified for intensification appears not to have been undertaken. The State Government "Network City" planning strategy described activity corridors as *"...connections between activity centres that provide excellent high frequency public transport to support land uses that will occur along activity corridors an at activity centre. Activity corridors are not designed to be high speed through traffic routes"*. There needs to be a common understanding about the function that each corridor has between Government agencies and Local Government as well as the community. There is concern that because the required modelling and research may not have been undertaken, more appropriate or alternative options may exist for the identified corridors or that some corridors may not be suitable. It is likely that some corridors will be suitable for intensification and support pedestrian and public transport focus, while others will need to remain focused on the movement of private vehicles and freight (and therefore less suitable for intensification). As there has been no consultation with the City of Stirling in developing the Framework, the City is not aware of the level of research that has been undertaken in identifying the significant number of corridors within its area.

13.2 There is little justification as to why certain corridors have been chosen (or not) with several questionable examples, such as a corridor though the suburban neighbourhood of Balga and a dead-end corridor between Glendalough and Subiaco. There also appears to be a lack of east - west corridor connectors.

13.3 It is recommended that fewer corridors be identified and some priority areas (for example Scarborough Beach Road) be funded with the necessary public transport infrastructure delivered by the State Government.

14. Residential Growth

14.1 The City of Stirling supports the position that 75% of infill is to be consolidated within activity corridors, centres and station precincts. However, the issue of land fragmentation is not identified or addressed, particularly along the identified corridors and around the activity centres. The previous blanket changes to the medium density Residential Design Codes allowing smaller lot sizes for group dwellings and apartments across vast areas of the City, has impacting on the possible redevelopment of land in and around activity centres and corridors.

15. Station Precincts

15.1 The Mt. Lawley train station and surrounding area has been identified as a station precinct, however urban consolidation of this area is heavily constrained due to heritage issues. Large areas to the north west of the rail line fall within a Heritage Special Control Area and consequently have a residential density coding of R12.5. The City's transport strategy recommends relocating the Mt. Lawley train station to the corner of Lord Street and Railway Parade (the previous location) as it offers better integration with existing zonings and improved development opportunities.

16. Industrial land

16.1 Additional information is required on the issues associated with industrial areas in transition, particularly from industrial/manufacturing to bulky goods or large format retail. For example, the actual remaining industrial uses within the identified Osborne Park industrial centre are minimal, due to the transition away from traditional manufacturing and the encroachment of commercial development.

17. Green Network

17.1 The City is concerned that the comment "*the remaining green network is evenly distributed across neighbourhood and district open spaces...*" (Centre Subregional Planning Framework Page 36) is not accurate for the City of Stirling, with many of our currently medium to higher density areas (such as, Joondanna and Osborne Park) being deficient in public open space.

17.2 The document makes the statement that "*public space is only as good as it is usable*" (Centre Subregional Planning Framework Page 36). This does not recognise that many of the areas identified in the green network map are bush-forever or reserved for conservation. It is requested that this conservation/biodiversity importance be more clearly expressed in the overall aims for the green network, particularly when considering the increased pressure on these areas due to the significant population growth expected and reduction in the urban tree canopy.

17.3 There is no recognition in the Strategy that infill development within suburbs, in particular group and multiple dwelling developments under the R-Codes, are removing the urban tree canopy. This is a significant issue that needs to be addressed in the Strategy and Planning Framework more generally.

18. Employment Growth

18.1 The framework lacks detail of how or where the increase in employment growth will occur within the City of Stirling or the central sub regional area. The City is unclear on how the Strategy will accommodate the proposed employment growth.

18.2 The City of Stirling's view is that this employment growth can only be delivered with a coordinated approach to economic development through a consistent approach to the planning of all strategic metropolitan activity centres (which includes the provision of appropriate infrastructure and transport facilities and the support of the development of mixed uses centres rather than predominantly single uses centres).

19. Infrastructure

19.1 The City has concerns about the infrastructure capacity outlined within the Framework, particularly statements such as "...there is either capacity in the existing infrastructure systems or provision has been made for the expansion of the system...". This has not been the case for major projects in the City of Stirling.

20. Implementation

20.1 The "Implementation Strategies" section of the framework identifies a range of fundamental (and complex) problems which need to be addressed in order to successfully implement this Framework. A further level of detail should be included that shows priorities and timelines for when these "strategies" will be likely commenced and/or finalised.

20.2 Based on extensive experience, it is the City's considered view that the R-Codes need to be reviewed as part of the implementation of any new Strategy or Framework for urban consolidation and develop a set of Form Based Codes for grouped and multiple dwellings in consultation with Local Government, the community and the development industry.
