
DRAFT PERTH AND PEEL GREEN GROWTH PLAN FOR 3.5 MILLION

City of Stirling Submission

15 March 2016

1. Draft Strategic Conservation Plan

1.1 Preliminary Comments

In accordance with the Connected City growth pattern identified in Directions 2031, 53% of Perth's projected population growth is to be accommodated in greenfield areas on the urban fringe, and 47% is to be accommodated in existing urban areas. The 53% greenfield target amounts to a need for 420,000 new dwellings to accommodate an extra 795,000 people. This 47% urban infill target amounts to a need for 380,000 new dwellings in order to accommodate an extra 705,000 people. The Green Growth Plan identifies that growth in the greenfield areas is to be supported by a substantial investment in transport infrastructure, however that same investment is not evident in existing urban areas.

The Green Growth Plan is predicated on the assumption that 47% of projected population growth to 2031 will occur within existing urban areas. In achieving these infill density targets, the Green Growth Plan provides limited acknowledgement of the infrastructure, in particular the public transport infrastructure, needed to promote urban regeneration and population growth along transport corridors and in activity centres within the inner urban area. Specifically, the State Government has failed to produce an integrated transport and land use outcome within the plans. While the Green Growth Plan contains an Action Plan for Infrastructure, much of the identified transport infrastructure is focussed on greenfield areas, and provides little support to existing urban areas in achieving the transport infrastructure upgrades necessary to support the 47% population increase. The planned transport infrastructure identified is focused on serving the transport needs of people at the periphery of the urban area (i.e. those using personal vehicles), or else rail transport of people from the periphery to the centre. There is no commentary on how employment areas will be linked or population growth in relation to these areas, and is thus wholly contrary to the planning principles of Directions 2031 and the draft Perth and Peel@3.5million.

The Green Growth Plan represents a missed opportunity to identify suitable intensification areas and use public transport investment to stimulate private sector investment in achieving urban intensification. Instead, the transport infrastructure identified will simply stimulate investment in greenfield developments on the urban fringe. There is no recognition of the enabling role public transport investment, and in particular light rail, can have in urban regeneration, nor is there an acknowledgement of the different transport solutions that will be required in the immediate future in order for the State Government's infill targets to be achieved.

Currently, 80 percent of dwelling growth within existing urban areas is happening through backyard infill ("Backyard Bonanza: improving the quality of "popular" suburban infill", by Anthony Duckworth-Smith, *Australian Planner*, Vol. 52, Issue 4, 2015). The State Government's infill plan is for approximately 25% of growth to occur as backyard infill, and for 75% to occur within activity centres and along transport corridors. Draft Action Plan A acknowledges that "*developing and revitalising activity centres as alternative places to live and work*" is a key outcome of State Government planning framework. It is asserted that there is very little likelihood of this occurring in the current planning climate unless governance mechanisms and funding mechanisms are changed and transport investment

decisions are changed. In contrast, the 53% infill target on greenfield land in the metropolitan area will be readily achieved because that is where the infrastructure is proposed.

Without an integrated transport plan it is considered that the Green Growth Plan will not facilitate the investment in transport infrastructure in a way designed to reduce pressure for urban expansion and increase the capacity, viability and desirability of urban consolidation. In the absence of an integrated transport plan, expansion (urban sprawl) will continue and conversely, the potential of existing urban areas to intensify will not be realised. Currently, the Green Growth Plan and related documents heavily focus on roads that will service and fuel demand for suburban sprawl and public transport infrastructure that focuses on trans-regional movement, not as a catalyst for intensification and urban renewal. This will have the effect of wholly compromising the strategic intensification of Perth's inner urban areas, with growth occurring in the suburbs (backyard infill), rather than along transport corridors and in activity centres.

1.2 Part 2.2 - Consolidated and connected urban areas

Part 2.2 fails to acknowledge that provision of sufficient public open space, including but not limited to conservation reserves, is an essential component of a quality urban environment. The intensification of urban areas without a commensurate increase in green spaces within the metropolitan area will be to the detriment urban streetscapes, amenity, and most critically, the health and wellbeing of society.

1.3 Part 2.5 - Streamlining environmental approvals

In the context of the City of Stirling, the introduction of what are effectively exemptions for scheme amendments that are compliant with the Green Growth Plan is in principle supported.

The referral of scheme amendments within this local government area to the Environmental Protection Authority (EPA) generally proves unnecessary, as in most instances scheme amendments within the City are determined to not require assessment by the EPA under Part IV Division 3 of the Environmental Protection Act 1986. Although the EPA are generally efficient in their response timeframes, removing this referral requirement will be beneficial to all parties as it will facilitate the more efficient processing of scheme amendments, and allow EPA officers to focus on proposals that are inconsistent with the Green Growth Plan.

1.4 Part 3.2 - Industrial Development

Figure 3 – 2 (pg. 27) identifies the whole of Osborne Park as industrial. This conflicts with the City's and WAPC's significantly advanced local and region planning scheme amendments to facilitate the use of the Herdsman-Glendalough structure plan area for the purpose of a transit oriented development (i.e. moving away from industrial uses). Specifically, the City has recently concluded advertising of Amendment No. 39 to Local Planning Scheme No. 3 to rezone the area from Industry to Development, and the WAPC has recently concluded advertising of Major Amendment 1291/41 to the Metropolitan Region Scheme to rezone the Herdsman Glendalough area from Industrial to Urban, Urban-Deferred and Central City Area.

The concern is that the identification of some parts of Osborne Park for industrial use will compromise the implementation of this project, and requests that the area identified on Figure 3 – 2 be amended to only include those areas of Osborne Park that are not affected by proposed Amendment No. 39 to the City's Local Planning Scheme No. 3 and proposed Major Amendment 1291/41 to the Metropolitan Region Scheme. These modifications should also be addressed in Action Plan A where applicable.

It is also requested that Figure 3 – 2 be reviewed to ensure that no land within the Stirling City Centre, which includes some properties in Osborne Park, is included in the area identified as the Osborne Park industrial area. This land is zoned Central City Area under the Metropolitan Region Scheme, and under the City's Local Planning Scheme No. 3 is zoned Development. The Stirling City Centre has an adopted structure plan in place which will facilitate the redevelopment of properties in the City Centre away from industrial land uses to uses more appropriate for this activity centre. The inclusion of these properties in the Osborne Park industrial area in Figure 3 – 2 and associated Action Plan A is therefore incorrect and should be rectified.

1.5 Part 3.4 - Infrastructure

There is no discussion in the Green Growth Plan, nor any other publicly available strategic document of the State government or its agencies, about what level of transport and service utility infrastructure is required to serve a population of 3.5 million. Without a clear plan to show what infrastructure is required and how it will be delivered, it will be difficult for the urban consolidation required by Directions 2031 or Perth and Peel @3.5 million to be implemented.

Detailed planning for urban consolidation around several major activity centres within the City of Stirling has recently been completed. However, without significant State Government funding for critical transport, water, sewerage and electricity infrastructure, limited amounts of urban consolidation can occur.

It is therefore recommended that the adoption of the Green Growth Plan is delayed until an integrated infrastructure plan is prepared and incorporated into all relevant State strategic planning documents. In the absence of this occurring, Part 3.4 and associated Action Plan C is unreliable, may not be able to be implemented, or the consequences of implementation may not be fully understood.

Public transport infrastructure such as light rail has been shown to stimulate private sector investment in activity centres and along corridors. Whilst the City's own integrated transport research has indicated strong support for the implementation of light rail to Mirrabooka, the implementation of light rail on Scarborough Beach Road is the preferred option. The City of Stirling has a long-formed Policy position that light rail should be provided between Stirling and Glendalough Train Stations via Scarborough Beach Road in order to support the Scarborough Beach Road Activity Corridor project, which will yield a total population of 63,745 with 33,550 dwellings, 82,040 jobs and 1,640,800m² of commercial floor space. This position has also historically been reflected at the State level in the Department of Transport's draft Public Transport Plan 2031, although this appears to not have been progressed since 2011. It is also noted that strategic planning framework is in place to readily facilitate the implementation of light rail along Scarborough Beach Road. The concern is that Figure 3 – 4 fails to identify the provision of light rail along Scarborough Beach Road between Stirling and Glendalough train stations. The City recommends that Figure 3 – 4, and the associated details within Action Plan C, be amended to identify the provision of light rail along Scarborough Beach Road to connect Stirling and Glendalough train stations.

There is a significant gap in infrastructure planning in that it fails to identify what social infrastructure is necessary to support a population of 3.5 million. Investment in schools, hospitals, police stations, and other social infrastructure will be essential as the population grows, and such infrastructure should be identified in not only the green Growth Plan, but also the strategic planning documents of the WAPC.

Further comments on the specific provisions of Action Plan C – Infrastructure are made later in this submission.

1.6 Part 4.2 - Overview of the Conservation Program

Clause 4.2.2 acknowledges the importance of preventing “*other species, ecological communities and biodiversity values from becoming threatened*”. In the context of the urban tree canopy, the Conservation Program is reliant in an improvement in habitat connectivity and ecological links across the landscape. Clause 4.2.2 acknowledges the importance of “*replanting projects (e.g. urban forest project) to increase the occurrence of plant species able to be used by cockatoos for feeding and roosting and to increase tree canopy cover across developed areas*”, however it does not recognise or address the significant loss of trees that is occurring in the metropolitan area as a result of infill development.

The protection of the urban tree canopy is considered a critical part of achieving the conservation objectives of the Green Growth Plan. Unfortunately, to date there appears to be limited understanding at the State level of the impact that infill development is having on the urban tree canopy, and the associated environmental implications. This is a significant issue that needs to be addressed in the State Planning Framework, including the Green Growth Plan.

In the City of Stirling's case, the following data reveals the critical rate of urban tree canopy loss throughout the City (i.e. not just areas zoned for urban infill):-

- Existing Tree Canopy Cover is 12.7%;
- If current rate of tree loss is maintained, by 2030 this would result in:
 - equivalent of 58,000 mature trees being removed;
 - average residential canopy cover will drop by half to 5.2%;
 - All suburbs will be below the City's 18% tree canopy cover target;
 - Tree loss was not confined to areas subject to redevelopment, such as the City's Residential R40 zones. Tree loss was also occurring in low density areas where large single dwellings (or additions to single dwellings) were resulting in significant tree loss;
- While the City is planting 7,000 trees per year, there will still be a Net Loss of 20 hectares in canopy cover by 2030;
- The City would need to plant 21,000 trees each year on public land to reach 18% canopy cover by 2030 in order to offset the loss of tree cover as a result of development on private property, however the City of Stirling only has the capacity to plant a maximum of 10,000 trees each year.
- Planting 10,000 new trees each year to offset the loss of mature trees on private property would amount to a cost of \$6 million per year.

It is apparent that many in the community also exhibit a growing awareness and understanding of the impacts of tree loss, as evidence in the outcomes of the City's Local Area Planning project. This concern is supported by the direction Council has set in its Strategic Community Plan 2013-2023 with regard to Sustainability. The rate of tree canopy cover loss in the urban environment lends weight to the argument that action is required at the Local and State government level to address this issue.

The majority of tree canopy loss results from development activity, primarily on, but also adjacent to development sites. The significant erosion of open space provisions in the R-Codes for grouped and multiple dwellings has exacerbated the problem of reduced tree cover, by reducing available space for landscaping. This means it is evident also in low density residential areas, where a trend is emerging for replacement single dwellings, or additions to dwellings, that result in a loss of tree canopy cover.

The Planning and Development Act 2005 does not include removing trees as development and Local Planning Scheme No. 3 does not restrict landowners from removing trees on

private land. The City is endeavouring to implement a draft Tree Management for Development Sites Policy, which will need to be accompanied by a Scheme Amendment that would provide a mechanism by which trees on private land could be retained through a condition of development approval, or alternatively for new trees to be planted to offset the loss of mature trees.

It is imperative the significant tree canopy loss in the metropolitan area be given consideration at the State Government level. The introduction of statutory mechanisms to require the retention of mature trees on private property, or to provide sufficient private open space for new plantings to offset the loss of mature trees, would play a significant role in maintaining urban canopy linkages between conservation areas of regional significance.

2. Action Plan A – Urban and Industrial Development

Please refer comments above regarding Part 3.2 (Industrial Development) of the Strategic Conservation Plan. It is requested that the City's comments in relation to the extent of the Osborne Park industrial area also be taken into account when reviewing Action Plan A.

3. Action Plan C - Infrastructure

Comments on the principles of the Infrastructure components of the Green Growth Plan have been made earlier as they relate to Part 3.4 (Infrastructure) of the Strategic Conservation Plan. The key points already made are:-

- a) There is a requirement for improved public transport to enable urban consolidation in activity centres and activity corridors however the State government has no long term public transport plan. In the absence of the finalisation of such a plan, the inclusion of Infrastructure components within the Green Growth Plan is premature; and
- b) Notwithstanding, light rail between Stirling and Glendalough train stations via Scarborough Beach Road should be included as per the Department of Transport's draft Public Transport Plan 2031.

The City's primary observation of Action Plan C is that it does not represent a coordinated approach to infrastructure provision. To the contrary, for such a high amount of detail to be provided in the absence of a coordinated strategy suggests that Action Plan C is no more than a list of already planned projects by the various infrastructure agencies.

3.1 Clause 3.2.2 – Light Rail and Appendix A, Table 2

The City is supportive of the inclusion of the MAX light rail project in Action Plan C. However, the City is concerned about the inclusion of a requirement for a maintenance depot, described as being located *"on the eastern side of Mirrabooka Avenue across from Polytechnic West Balga site. This site is 7.4 ha and would accommodate all stabling and maintenance facilities until 2031"*.

The area described above is currently reserved under the Metropolitan Region Scheme for the purpose of Parks and Recreation, and is also a Bush Forever Site. The site is also identified as a conservation reserve within the Action Plan H document.

It is clear that there is a conflict between the proposed location of the depot and the existing planning controls on the land which seek to protect it as a conservation reserve. There is also a conflict with the Green Growth Plan itself as Action Plan H conflicts with Action Plan C in relation to the conservation of this land.

The City therefore suggests that clarification is provided in relation to the intended location of the depot site. If the intended site is in fact the one described above, rather than on the western side of Mirrabooka Avenue as City officers have previously been advised, then the

City objects to this location given it does not reflect the purpose of this reserved land and will result in the clearing of protected native vegetation.

3.2 Appendix A, Table 2 – Balcatta Bus Depot

A new bus depot is identified as being located in Balcatta. No further details are provided on its specific location. The planning framework in this area contains a mixture of 'Mixed Business' and 'Industry' zoned land; the land use of Transport Depot is prohibited in the Mixed Business zone, however is Permitted in the Industry zone. It is therefore recommended that the land use permissibility of any potential depot site in Balcatta be considered during preliminary investigations to ensure the land use is in fact permitted.

3.3 Appendix A, Table 2 – Mirrabooka Bus Depot

A new bus depot is also identified as being provided in Mirrabooka. It is noted that an existing bus station is located here, however that does not function as a depot at present. Clarification is therefore requested on the location of the new bus depot, and whether this will affect the use of the existing bus station land.

It is also recommended that preliminary investigations consider the planning framework in Mirrabooka. The City has invested significant funds and resources in the preparation of a planning framework to facilitate the redevelopment of the Mirrabooka town centre. A bus depot in the town centre is therefore not an acceptable planning outcome for the City of Stirling.

3.4 Appendix A, Table 2 – Upgrading of existing Primary Regional Roads

The City notes the upgrading of the following Primary Regional Roads within the City of Stirling, as identified in Appendix A, Table 2:

- Karrinyup Road / Morley Drive
- Marmion Avenue
- Mitchell Freeway
- Reid Highway
- Stephenson Highway
- Wanneroo Road

The City does however reiterate its earlier position that in the absence of an integrated transport plan, the upgrading of primary roads will only facilitate the ongoing use of private vehicles. In order for a sufficient transport modal shift to occur, it is apparent that a change at the State level needs to occur which facilitates the prioritisation of public transport over the provision of new and upgraded roads. Moving 3.5 million people throughout the Perth and Peel area will simply fail to function effectively unless this occurs.

3.5 Appendix A, Table 2 – Conversion of Other Regional Roads to Primary Regional Roads

Table 2 identifies the conversion of a number of Other Regional Roads to Primary Regional Roads, however does not currently include any roads in the City of Stirling. The City requests that consideration be given to redesignating Alexander Drive from Other Regional Road to Primary Regional Road, primarily to reflect the desire of the State Government to accommodate the proposed Perth MAX Light Rail along this route.

3.6 Figure 6: PTA Proposed infrastructure – Central sub-region

Figure 6 identifies a proposed railway from the Perth CBD, parallel to the proposed MAX light rail, and finishing at what appears to be Morley. This railway is not discussed anywhere in Action Plan C, and does not appear to have been identified in any other strategic planning documents to date, including the Department of Transport's draft Department of Transport's draft Public Transport for Perth in 2031 document. In the absence of any information on this proposed railway, the City objects to its inclusion in Figure 6.

4. Action Plan H – Conservation Program

4.1 Appendix 1 Map

The boundaries of the Phase 1 conservation area shown in Appendix 1 appear to include a portion of an oval (i.e. cleared land) associated with John Septimus Roe Anglican School (on Mirrabooka Avenue, north of Reid Highway). The City does not believe there is any purpose in including a part of an oval with this conservation area. It is therefore recommended that the map be reviewed to ensure the boundaries are correct and/or consistent with those shown on Bush Forever Map Sheet No. 41.