



A Co-operative venture of the municipalities of:  
Cockburn, East Fremantle, Fremantle, Kwinana, Melville & Rockingham

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Hon. Rita Saffioti  
Minister for Transport: Planning; Lands  
Gordon Stephenson House  
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PERTH, WA 6000  
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Dear Minister Saffioti,

**SOUTH WEST GROUP SUBMISSION: GREEN PAPER – PROPOSALS FOR MODERNISING THE PLANNING SYSTEM**

Thank you for the opportunity to provide a submission on the *Green Paper – proposals for modernising the planning system* document.

The South West Group is a voluntary regional organisation of Councils established in 1983 and comprising six Member Councils in the South West Metropolitan Region: City of Cockburn, Town of East Fremantle, City of Fremantle, City of Kwinana, City of Melville and City of Rockingham.

The South West Group recognises that the intent of the Green Paper is to begin a process of creating a more strategic and streamlined planning system that is more open and accountable, and it commends the Minister and the State Government on the review and the consultative process that it will follow. In broad terms, the South West Group supports the undertaking of the review, its objectives and the five overarching key reforms.

The comment in the Green Paper that “... *some development requires more than a dozen documents, including scheme, plans, strategies, regulations, policies and codes that need to be read, understood and cross-referenced. Some documents are out-dated, while others have been in draft form for a long time. Some documents are poorly written without clear guidance. There is overlap and inconsistency between documents with no clear indication of precedence*” clearly indicates that the review is badly needed and well timed.

The South West Group Member Councils are expected to make individual submissions, therefore, the South West Group’s submission focuses on “Key Reform 5: Planning for consolidated and connected smart growth”. It also provides constructive general commentary on development of the White Paper. As requested, the main response is provided in accordance with the template provided by the Department.

It is recognised that details of how the reforms will be implemented are to be included in the White Paper. Among other things, the White Paper should address:

1. Governance structure to provide role clarity and accountability: who is responsible for implementing each reform recommendation; when it will be

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implemented; and assessment and reporting of the success or otherwise of each recommendation.

2. Resource allocation: to ensure that the recommended approach is sufficiently resourced. This may include programs to build capacity.
3. Priorities and sequencing of the reform recommendations.
4. Timeframes: noting that Member Councils have raised concerns whether the suite of reforms can realistically be worked through in a reasonable timeframe, especially considering that a number will require legislative changes.
5. Relationships with related legislation: for example, it should clearly explain the relationship with the *Strategic Community Plan* document required under the *Local Government Act 1995*.

5.0	PLANNING FOR CONSOLIDATED AND CONNECTED SMART GROWTH	SOUTH WEST GROUP COMMENTARY
5.1	Planning for Targeted Urban Infill	
5.1.	That the State Government develops clear arrangements for the planning and delivery of the key urban infill locations of activity centres, urban corridors and station precincts, including prioritising of areas which require State and local government collaboration.	<p>The planning system intended to deliver urban infill has become overly complicated, and it could be argued that it has hindered achievement of infill housing targets. Naturally, any approach to infill needs to recognise the unique characteristics of each Local Government area and protect its local character. It is recommended that the development of clear planning arrangements in urban infill sites should be guided by overarching set of principles that connect to the State’s intended strategic outcomes and the ‘bigger picture’. This should help set clear expectations around community engagement and protection of local character.</p> <p>It is crucial that the planning system acknowledge and accommodate the diversity of Local Government areas in Western Australia. The Green Paper concentrates on improvements on high growth areas and local governments with a large range of planning functions. Such LGAs are in the minority in Western Australia and therefore the planning system should account for 139 LGAs in the State, of greatly diverse size, character and development pressures.</p> <p>The South West Group encourages the State to review strong models of revitalisation strategies already implemented at the Local Government level. There are strong examples within the South West metropolitan region (e.g. City of Cockburn) that have balanced sustainable development principles with local community expectations in a mature and sophisticated manner.</p>
5.2	Updating Growth Management Policies	
5.2.	A new Consolidated and Connected Smart Growth State Planning Policy that builds on	There is a clear and recognised need to simplify the State Planning Policy framework into one consolidated document that users can understand without the need for costly technical advice.

	the State Government's METRONET policy and establishes contemporary smart growth principles and practices.	<p>Based on feedback from developers, there is a perception that the planning system has become overly complex leading to increased costs that ultimately have a negative effect on affordability for the end user (e.g. home buyers and businesses).</p> <p>Logically, infrastructure delivery should be coordinated in accordance with the State's strategic planning framework including alignment to activity centre development, urban corridors and transit oriented developments. This process may include mandating local government involvement in determining the priority of precincts and that this be through an open and transparent process involving Infrastructure WA.</p>
5.3	Planning for Land Use and Infrastructure Coordination	
5.3.	The WAPC to assist with land use and infrastructure coordination for the delivery of priority precincts through a renewed Committee.	<p>Improved coordination of strategic planning with infrastructure coordination and delivery is of vital importance. The State Government should be in a position to not only 'provide advice' on forward planning of State infrastructure – but to provide certainty of what, where and when enabling infrastructure will be delivered in order to support the strategic aspirations of the State.</p> <p>This has been managed poorly in Western Australia, unfortunately the Infrastructure Coordinating Committee (ICC) appears to have been largely ineffective in performing the functions expected of it by external stakeholders. A thorough review of the ICC should be undertaken as part of this process to ensure clarity and certainty around the decision-making process for infrastructure delivery - it is recognised that Infrastructure WA could partly fill this void.</p> <p>Improved coordination and communication around infrastructure delivery would provide certainty to the community and the development community. It could form part of a coordinated investment attraction strategy that facilitates achievement of the State's strategic goals.</p> <p>Ideally, coordination of infrastructure delivery to deliver the State's strategic outcomes should include commitments developed in partnership with industry and the community that makes it harder to be unwound by State Governments.</p>
5.4	Coordinating State Infrastructure with Regional Rezonings	
5.4.	Provide in the Metropolitan Region Scheme an "Industrial Deferred Zone".	No specific comment from the South West Group – refer to submissions from Member Councils
5.4.	The WAPC to ensure that any requirements for State infrastructure are in place in the lifting of Urban Deferment or Industrial Deferment, and that the draft	No specific comment from the South West Group – refer to submissions from Member Councils

	Guidelines for Lifting of Urban Deferment 2017 be amended accordingly.	
5.5	Coordination of Infrastructure for Land Development	
5.5.	Provision be made for advice on the forward planning of State infrastructure, including utility providers to assist local governments in the preparation of Local Planning Strategies and structure plans.	<p>The information / data held by various State Departments and utility providers should be more readily shared with Local Governments. The South West Group (and Member Councils) has had requests of this nature refused on multiple occasions. Consequently, community facility delivery and development outcomes have not been as strong as they could have been.</p> <p>Furthermore, it should be acknowledged that where Local Governments are undertaking to open up a new urban infill housing precinct, it is in alignment with State Government's strategic aspirations and should be supported. Infrastructure providers should recognise this and support from the providers should be forthcoming and/or prioritised where possible.</p>
5.6	Coordination of Land Use and Transport for Corridor Development	
5.6.	The MRS be updated to include "Urban Corridor" as a category of Reserved Roads based on Perth and Peel @ 3.5 Million, with the Department of Transport being made responsible for coordinating a whole of transport portfolio response to planning proposals along the corridor.	<p>This statement is interpreted to mean that the responsibility for the transport planning of these corridors be managed solely by the Department of Transport rather than a combination of agencies. Based on that understanding and with the effective resourcing of Department of Transport, the South West Group support this recommendation.</p> <p>Historically, agency priorities have been misaligned due to the competing interest of Main Roads WA and its requirement to ensure greatest efficiency for the road network, and that interest having apparent primacy over all other factors related to the sustainable development of our state and its activity centres. This situation is untenable if our State is to grow in the sustainable manner that we desire.</p> <p>The experience of South West Group Member Councils, invested in the development of economically and culturally sustainable activity centres, has been in direct conflict with the stated aims of Main Roads WA. This has led to poor outcomes from an urban design and amenity perspective, negatively affecting community perceptions of higher density areas and the experience of living in urban centres.</p> <p>Support for this recommendation is made on the assumption that Department of Transport takes into consideration the wider strategic ambitions of the State and Local Governments to create more liveable and walkable Cities in Western Australia.</p>
5.6.	A review be undertaken of regional road reservations in place to accommodate road	Any proposal to widen road reservations through urban corridors must take into consideration an understanding of how the corridor interacts with activity centres along its route so as not to interfere

	widening within the Metropolitan Region Scheme for designated Urban Corridors.	in the orderly planning of them, and to not limit opportunities for future development.  Therefore, it is important that road reservations are maintained at sufficient width to accommodate any future rapid transit systems and/or infrastructure that facilitates activity centre and activity corridor activation.
5.7	Liveable Neighbourhoods	
5.7.	Liveable Neighbourhoods be elevated to a state planning policy and maintained and refined as a best-practice approach to new greenfield development at regional, district and local level, rather including it into a single Neighbourhood part of Design WA.	The South West Group partly supports the proposal to give consideration to elevating Liveable Neighbourhoods to a State Planning Policy as long as the document is reviewed and updated in a consultative manner as part of this overarching process.  However, that consideration may determine that the document is no longer required and/or adds little value to the revised planning system. It should be recognised that elevating the document in status may be contrary to the aim of consolidating all SPPs into a single, simplified high level policy document.

If you require any additional information from the South West Group, please do not hesitate to contact me.

Yours sincerely,

[sent by e-mail]

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