

11 October 2010

Sub-regional Strategy Public Submission
Western Australian Planning Commission
469 Wellington Street
PERTH WA 6000

By email to: corporate@planning.wa.gov.au

Dear Sir/Madam

SUBMISSION ON THE OUTER METROPOLITAN AND PEEL SUB-REGIONAL STRATEGY

Thank you for providing the opportunity to provide comment on the above document. We trust that the comments provided will be of assistance in establishing a strategic direction and priority actions for improving the Outer Metropolitan regions.

General Comments

The Shire of Serpentine Jarrahdale is supportive of the work done by the Department of Planning and the Western Australian Planning Commission to establish an overall framework for development of the Metropolitan region of Perth and Peel. The Shire also wishes to commend the WAPC for commissioning the Outer Metropolitan and Peel Sub-regional Strategy and for working with the local councils to provide the best outcomes for future planning.

The Shire is a hyper growth area and is very concerned that the demand for growth will outpace the provision of infrastructure, facilities and services. The Shire is involved in a number of initiatives that are attempting to address these issues and the statements and concerns regarding the Outer Metropolitan Sub-regional strategy should be read in this context.

The Shire however still seeks to work closely with the State to ensure that mutually beneficial outcomes can be achieved with development approvals, residential land release and the protection of agricultural and rural lands.

Positive aspects

The Shire is appreciative of a number of aspects in the Sub-regional strategy and thanks the Commission for its acceptance of these aspects. These include:

Overall density of 15 dwellings per hectare

The Shire is supportive of the principles that are espoused in the document and supports the initiative to increase densities in the urban areas to allow for better utilisation of infrastructure.

Principles for further development areas

We are pleased to note that the Commission has not precluded all new developments from being considered for development. The Shire has been involved in discussions with yourselves and the

proponents of the Oakford Rural Village for a number of years and although the sub-regional strategy does not indicate Oakford as a development area we are pleased to note that Oakford will be able to progress if it follows the principles espoused on page 36 section of the document. The Shire is also aware and will be an active partner in the revision of the Sub-regional structure plan that will look at the full-build out scenario for the foreseeable future.

Land release categories

The Shire is supportive of the imposition of planning categories for development staging. This will create certainty and will allow for proper planning in the areas where development is to be supported. It also allows for sufficient flexibility in areas where some uncertainty exists and sends a clear signal as to where development will not be supported. This also allows for coordination of infrastructure and clarifies where the infrastructure is required or not as the case may be.

Cardup Industrial Area

We are pleased that the proposed Cardup Industrial Area has been included in the document. The Shire is in need of employment opportunities for the expected 70 000 residents in Byford and more specifically Mundijong and the provision of employment areas close to these developments is very important.

East West Infrastructure

The Shire appreciates the strengthening of the east-west infrastructure that has been included in the strategy. Much has in the past been made of the access to the north into Perth for employment and other services but a significant number of people will be employed in the west near the coast in the industrial areas of Kwinana and Rockingham and will utilise the infrastructure that has been provided near the coast. Strengthening the linkages to these areas is also important .

Passenger rail to Byford and Mundijong

The Shire is pleased that the text on page 85 paragraph 10.7.3 indicates that the passenger rail to Byford and Mundijong has been given some prominence and appreciates this crucial component of the public transport network. We would however appreciate it if figure 79 could be adjusted to also indicate this.

Clarity required

Density Targets

The Western Australian Planning Commission is commended for seeking a growth target for a 50 percent increase in the current average residential density of 10 dwellings per gross urban zoned hectare to achieve 15 dwellings per gross urban zoned hectare of land in new development areas.

Whilst this principle is supported, there is a lack of clarity as to how this requirement will be enforced and encouraged to ensure that business as usual does not continue, particularly within Greenfields development.

It is recommended that clarification within the documentation be provided on the following:

1. Expected density provision within new developments: It has been mentioned by representatives at the Department of Planning that to achieve a 50% increase in the current average residential density new development will be required to achieve 17 dwellings per hectare to ensure a 15 dwelling per hectare average. If this is the case should new development be expected to achieve 17 dwellings per hectare as per the high

growth scenario? (Current Actions promote 15 dwellings per hectare as per Liveable Neighbourhoods) Or is it anticipated that as a result of infill development areas, the number of dwellings per hectare within existing areas will increase and therefore the 15 dwelling per hectare average should be achieved. Clarification is sought in this regard.

2. Strategy 4, Action 4.1: Promote Liveable Neighbourhoods policy standard densities of 15 dwellings per gross urban zoned hectare: In relation to the above action, Liveable Neighbourhoods requires that in most new urban areas, urban densities of at least 15 dwellings per urban hectare, and an average of 22 dwellings per site hectare should be provided. Reference to the requirement of an average of 22 dwellings per site hectare should be made within the Strategy as an alternative method of determining whether target densities are met. As some areas may have areas of environmental significance or may require large areas to be set aside for community purposes or drainage which may result in difficulties in achieving a gross area target. Consideration should also be given as to whether this Action should reference a higher dwelling requirement in order to achieve the high growth scenario target.
3. Structure Plan requirements: Whilst there are requirements for Schemes and Strategies to provide for greater density, there is no action in regard to the need for Structure Plans to demonstrate compliance with density requirements. It is recommended that an additional action be included to state: *Local Structure Plans to demonstrate compliance with the Liveable Neighbourhoods requirement that most new urban areas achieve urban densities of at least 15 dwellings per urban hectare, and an average of 22 dwellings per site hectare.* Consideration should also be given as to whether this recommended Action should reference a higher dwelling requirement in order to achieve the high growth scenario target.
4. Greater incentives for higher density: The action to provide further incentives for single bedroom and aged or dependent person dwellings and other forms of ancillary accommodation is supported. It is recommended that incentives should also be considered for construction of high density housing.

Proposed amendments

The Shire does have some concerns regarding the document and would propose the following changes:

Coordination of Infrastructure

The Shire is concerned that the required levels of infrastructure coordination that will be required to provide the infrastructure such as roads and passenger rail for Mundijong and Byford is not addressed adequately through the document. The provision of infrastructure to hyper-growth councils has long been an issue faced by the outer metropolitan Councils who are all vying for the next portion of infrastructure to be installed. New and innovative approaches to infrastructure provision such as water re-use initiatives in the outer councils also need to be mentioned and actioned within the document.

Population projections and dwelling allocation (page 78 paragraph 10.1)

The fourth paragraph under this heading is a general statement for the whole of the south-eastern region and does not seem to be relevant for Serpentine Jarrahdale at this stage in its development. We are also concerned about the average household size that has been used as decreasing this from 2.75 to 2.21 has significant impacts on the provision of facilities such as schools. In the case of Mundijong for example the District Structure Plan provides for eight schools in line with the original figures and with the new figures ten are required.

Although the Shire is thus supportive of the need to limit dwelling allocations and lower population projections the current allocations are not considered to be realistic. Using the current development applications as a guide it can be seen that the development of Byford at current rates will be above the allocation implied by the document. If Mundijong is also brought into the equation then the projections fall short of even our conservative expectations.

It needs to be mentioned that both Byford and Mundijong have been zoned for urban development. Significant planning activities have been undertaken which will result in near full build-out by 2031 in Byford and formal submission of Local Structure Plans for Mundijong are imminent.

It is clear that the metropolitan modelling that the Department has undertaken probably works for the majority of the regions in the metropolitan area but cannot be used for the Serpentine Jarrahdale area without due consideration of the processes underway in Byford and Mundijong. The blanket allocation of population and dwellings to the various area does not accurately reflect the reality on the ground.

The Shire cannot accept the population figures and dwelling allocations presented in the document and it is quite clear that additional modelling will be required for the Serpentine Jarrahdale area. The Shire is currently working with id.forecast to revisit the current growth figures as indications are that even the current figures are conservative.

Description of Shire of Serpentine Jarrahdale (Page 77 paragraph 9.8)

The comment *'The shire is largely rural with mainly low density residential urban development throughout the area. Byford and Mundijong are the two district centres in the area'* is not a very accurate reflection of the current development being experienced within the Shire and anticipated future growth.

The Shire is experiencing rapid growth and it is recommended that comments be reflective of this through the following wording: *Whilst the Shire has historically been predominantly rural, the Shire is experiencing significant urban growth within Byford. A large urban cell also exists within Mundijong Whitby which will provide for medium to long term growth to accommodate for a population of 30,000 – 40,000 people.*

Development in Mundijong and Byford (Page 80 paragraph 10.4)

The Shire is currently evaluating more than ten Local Structure Plans in Byford that cover most of the area that has been zoned for development. It is expected that Byford will be more or less fully developed in twenty years time as all the necessary development initiatives are nearing finalisation.

Similarly the Shire cannot agree with the statement on page 80 paragraph 10.4 regarding short term growth in Mundijong. The Shire is currently finalising the Mundijong District Structure Plan and is advancing the development of this zoned area in conjunction with your department and developers. All indications are that formal submissions of Local structure plans in Mundijong are imminent. Therefore it is critical that the growth expectations in Byford and Mundijong are acknowledged and that infrastructure provision is staged in such a way to accommodate this high growth.

The Shire would support the notion that further development in Serpentine should be delayed until significant building activity has taken place in Mundijong.

Description of Byford (Page 81 paragraph 10.4.1):

This section states: *The Byford District Structure Plan has identified growth capacity for a future population, which is anticipated to be sufficient to accommodate demand beyond 2031.*

The Shire has been under pressure from developers and the WAPC to proceed with a District Structure Plan for Mundijong Whitby to provide for future growth. The above statement does not reflect discussions with the WAPC in this regard. It is the Shires understanding that planning for Mundijong Whitby needs to be progressed expeditiously to accommodate further growth as Byford will not be able to support future growth in the medium term. Based on current growth it is anticipated that Byford will accommodate growth within 10 years

Suggested rewording is as follows: *The Byford area has experienced substantial growth and is capable of supporting future growth in the medium term. It is anticipated that the Byford development area will accommodate a population of approximately 38,000.*

Description of Mundijong (Page 81 paragraph 10.4.1):

The town of Mundijong is experiencing significant development pressure. Structure Planning for the area is underway and has identified the capacity to accommodate 30,000 residents over the long term. It is expected that development in Mundijong will follow Byford and is therefore considered a medium to long term growth opportunity for beyond 2031.

The above statement is contradictory. Stating that Mundijong is experiencing significant development pressure though further stating it is not expected to develop until beyond 2031. Whilst offices at the Department of Planning have advised that the intent of this statement refers to development commencing in the medium term though extending beyond 2031. This should be made clearer to prevent misinterpretation of the statement. The District Structure Plan also encourages a population of 40,000 based on advice from the WAPC and should be reflected in the Strategy.

Suggested rewording is as follows: *Mundijong Whitby contains an urban cell with an area of 1420 hectares. The area is expected to experience significant development pressure in the medium to long term. Structure Planning is currently underway to guide future development within the area that is expected to accommodate for a minimum population of 30,000 and potentially up to 40,000 residents.*

Mundijong West Industrial Area (Page 84 paragraph 10.6.3, Page 85 figure 51 and Page 79 figure 45)

The Shire is also most supportive of the Mundijong West Industrial area and is rather concerned that it does not feature prominently on the mapping (page 85 figure 51) even though it is mentioned in page 79 figure 45. On page 84 paragraph 10.6.3 the document states that the draft Industrial Land Strategy (WAPC 2009) identifies West Mundijong as a future industrial site. Figure 45, however, does not depict the area as a '2009 draft industrial land strategy area'. Figure 45 should be amended accordingly.

Planning actions required in the south-east sub region (Page 88 Figure 54)

Actions to include – Prepare Developer Contribution Plans for traditional and community infrastructure to facilitate the equitable provision of infrastructure within the Mundijong-Whitby urban cell.

Freight Rail (Page 86 paragraph 10.7.5):

Greater emphasis should be given to the importance of relocating the freight rail. Suggested wording to be included between the and last paragraphs: *A realignment of the Kwinana-South West freight rail that currently runs through the centre of the Mundijong-Whitby urban cell is critical for the future urban development of Mundijong-Whitby. Failure to relocate the freight rail will result in significant implications including poor accessibility, safety and amenity, and the inability to achieve passenger rail in the future.*

An investigation into the feasibility of relocating the freight railway will be required. A potential alignment for the relocation of the freight rail has been provided for within the draft Mundijong Whitby District Structure Plan and a Business Case has been prepared and provided previously to the Department of Planning and the Department of Transport. Figure 45 should also be amended to depict the possible realignment of freight rail.

Regional alignment with the South East Region

The Shire is still concerned about the current regional alignment with the metropolitan areas of Armadale and Gosnells. Even though in some ways the alignment is sensible, the values and vision of the local authorities are far removed from each other. The Shire is part of the Peel Harvey Catchment and is covered by associated State Planning and environmental legislation and in fact is considering and indeed has a number of strategic regional alliances with Mandurah and the other Peel region councils. The alignment with the South-east region should probably be reconsidered, as the Peel region would probably be more appropriate in terms of the proposed nature and principles of the Shire of Serpentine Jarrahdale.

The Shire of Serpentine Jarrahdale Council has previously raised some serious concerns regarding the Outer Metropolitan and Peel Sub-Regional Strategy. These include the average household size and population projections, the short term estimations of growth in Mundijong, the extension of the passenger rail to Byford and Mundijong to accommodate the public transport need, the re-alignment of the freight rail around Mundijong, the prominence of the Mundijong West industrial area visa vie the intermodal transport site, the continued existence of the proposed Southern link road, and the issue of Oakford Rural village still not featuring in the document.

We are however most appreciative of the time the Department of Planning officers have spent discussing the issues with elected members and officers and the commitments made to rectify some of the inconsistencies in the document. We also agree with the overall densities proposed and appreciate that the current thinking of our local authority regarding the urban villages concept has been strengthened in the document. We also appreciate the efforts made to create linkages to the coast and the employment opportunities there and also for the addition of employment areas such as the Cardup industrial site in the document. In summary we would propose the following:

| Section | Current wording | Recommended modification |
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| Strategy 4, Action 4.1 | Promote Liveable Neighbourhoods policy standard densities of 15 dwellings per gross urban zoned hectare. | Insert reference to 'an average of 22 dwellings per site hectare should be provided.' <i>Note: If it is intended that 17 dwellings per hectare should be the target then the action should be modified to refer to an increased number of dwellings.</i> |
| Strategy 4 – proposed new action | N/A | Insert new action: Local Structure Plans to demonstrate compliance with the Liveable Neighbourhoods requirement that most new |

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| | | <p>urban areas achieve urban densities of at least 15 dwellings per urban hectare, and an average of 22 dwellings per site hectare.</p> <p><i>Note: If it is intended that 17 dwellings per hectare should be the target then the action should be modified to refer to an increased number of dwellings.</i></p> <p>Lead Agency: Development Industry</p> <p>Partners: Department of Planning, WAPC, Local Government authorities</p> |
| Strategy 2 – proposed new action | N/A | Insert new action: Identify incentives for the construction of high density housing. |
| 9.8 p77, Shire of Serpentine Jarrahdale | The Shire is largely rural with mainly low density residential urban development throughout the area. Byford and Mundijong are the two district centres in the area. | Reword as follows: Whilst the Shire has historically been predominantly rural, the Shire is experiencing significant urban growth within Byford. A large urban cell also exists within Mundijong Whitby which will provide for medium to long term growth to accommodate for a population of 30,000 – 40,000 residents. |
| Section 10.4.1, p81 Byford | The Byford District Structure Plan has identified growth capacity for a future population, which is anticipated to be sufficient to accommodate demand beyond 2031. | Reword as follows: The Byford area has experienced substantial growth and is capable of supporting future growth in the medium term. It is anticipated that the Byford development area will accommodate a population of approximately 38,000. |
| 10.4.1, p81 Mundijong | The town of Mundijong is experiencing significant development pressure. Structure Planning for the area is underway and has identified the capacity to accommodate 30,000 residents over the long term. It is expected that development in Mundijong will follow Byford and is therefore considered a medium to long term growth opportunity for beyond 2031. | Mundijong Whitby contains an urban cell with an area of 1420 hectares. The area is expected to experience significant development pressure in the medium to long term. Structure Planning is currently underway to guide future development within the area that is expected to accommodate for a population of 30,000 to 40,000 residents. |
| Figure 54 | N/A | Insert action: Prepare Developer Contribution Plans for traditional and community infrastructure to facilitate the equitable provision of infrastructure within the Mundijong-Whitby urban cell. |
| 10.6.3 p84 | N/A | Insert additional wording between and last paragraph: A realignment of the Kwinana-South West freight rail that currently runs |

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| | | through the centre of the Mundijong-Whitby urban cell is critical for the future urban development of Mundijong-Whitby. Failure to relocate the freight rail will result in significant implications including poor accessibility, safety and amenity, and the inability to achieve passenger rail in the future. |
| Figure 45 | N/A | Modify Figure 45 to depict possible realignment of freight rail. Modify Figure 45 to depict West Mundijong as a 2009 draft industrial land strategy area. |

If you would like to discuss any of the matters raised in this submission, please do not hesitate to contact the undersigned on 9526 1111.

Yours faithfully

Deon van der Linde
EXECUTIVE MANAGER STRATEGIC PLANNING