

Our Ref: 12.1.64

21 December 2005

Mr Jeremy Dawkins  
Chairman  
Western Australian Planning Commission  
Albert Facey House  
469-489 Wellington St  
PERTH WA 6000

Dear Jeremy

## **STATEMENT OF PLANNING POLICY NO 2.6 STATE COASTAL PLANNING POLICY**

The Urban Development Institute of Australia (UDIA) is the peak body representing the property industry in Western Australia. It is in this regard that we offer our response to the WAPC Planning Policy No 2.6 Coastal Planning Policy.

In principle, UDIA supports the preparation of an over arching state government policy for coastal development. UDIA believes that a clear policy approach in regard to what can be built along the Western Australian coastline would assist in overcoming the current uncertainty and community concern about coastal development in the state.

UDIA also understands that the government and the wider community do not want Perth's coastline to become over developed. However we believe that high quality planning policies and regulations can ensure that demand for coastal housing and commercial development can be achieved while ensuring that the natural and built form characteristics of the coast that are valued by the community can be retained.

### **Despite community concerns about high rise development there is continued strong demand for coastal development in WA**

The population in Western Australia is rapidly growing due to increased migration from interstate and overseas. As the population increases it is evident that coastal locations remain the highest demand areas in Perth and Western Australia as a whole, with some 70% of new lots in Perth being created in coastal suburbs.

This demand has created Perth's distinctive development pattern, with the coastal development corridors now stretching as far north as Yanchep and south to Mandurah.

In relation to this development pattern, it is evident that there is conflict between community desire to live in coastal locations and the government agenda to limit future urban sprawl both along the coast and throughout urbanised Western Australia. Community desire to live near the coast also conflicts with community and government concern regarding higher density development in coastal areas.

This conflict was highlighted through the recent Coastal Planning Strategy Community Survey which confirmed the importance of the coast to Perth residents as a place to live, socialise and relax. The survey also demonstrated the need to ensure balance is achieved between appropriate development to meet demand and the protection of the natural environment.

In particular the survey demonstrated that the majority of the Perth community does accept and support the need for new coastal development in appropriate locations, and this includes some medium and high density styles. It also showed that the Perth community recognises the need for the improvement of particular coastal nodes such as Coojee and Leighton.

Further to these views about improving development along the coast, the survey also found that the majority of respondents were concerned about higher-rise development on the coast. We accept that this is a genuine concern and reflects the detrimental impact that higher density development can have if it is not of an appropriate scale and design for its location.

However we believe that higher density development can be appropriate if cited in an appropriate location and being of a scale and design that does not adversely impact on the local environment.

Examples of appropriate higher density development are evident in Perth and, in this regard there are some recent high density developments which have occurred in coastal locations with the support of the local community such as in Rockingham and Mandurah.

### **Higher density development is a key aspect of achieving urban consolidation**

Urban consolidation is a key objective of state government policies such as Network City and the recently released Urban Growth and Settlement SPP. These policies endorse infill and high density development in order to minimise urban sprawl and plan for a more sustainable future.

As previously outlined, with the majority of West Australians wanting to live near the coast, coastal locations are key areas in which urban consolidation will need to be delivered if the goals of Network City and the Urban Growth and Settlement SPP are to be achieved.

In relation to these policies (in particular Network City), there are important opportunities for transit oriented developments to be created near the coast where people, local residents and local authorities can benefit from reduced car use and parking requirements at busy beaches. It may be suitable in such situations for some development to be higher than 5 or possibly 8 storeys in order to maximise the potential of the area.

**UDIA believes that the best results for the coast will be achieved through the development of flexible guidelines rather than a blanket height restriction**

There is a need for comprehensive guidelines to be developed which can guide coastal development and ensure that any new development is appropriate for its locational context. These guidelines should include but not be limited to the appropriate scale of development for different location types.

Urban design impacts are not solely dependant on height and the state government policy should consider all factors equally in making a decision on appropriate coastal development. Characteristics such as form, height, foot print, scale, massing, amenity, external appearance (such as colour) and materials used all combine to influence urban design. UDIA does not believe that considering height out of context with these numerous other factors is appropriate when they can have just as much if not more impact on the surrounding area.

Uniform height restrictions have the potential to produce negative outcomes with development resulting in a ‘wall’ across the coast, limiting the potential for diversity in design and also for views through to the coast.

New South Wales and Victoria both have comprehensive coastal development design guidelines which address many of the planning issues surrounding coastal development, with height being only one factor of consideration. Both state policies provide a guide for local authorities to assist them in making final approval decisions. Particularly in NSW the premise of place-based design outcomes is reinforced with the guidelines promoting the consideration of development proposals in the context of the area it is proposed rather than just using a one size fits all approach. The Coastal Design Guidelines for New South Wales concentrate on the importance of quality design rather than just height specific regulations, stating: “Consider the appropriateness of new buildings within the whole streetscape, rather than each building as a stand-alone object”.

UDIA recommends that the Western Australian government consider these aspects of the NSW and Victorian guidelines and look at implementing similar guidelines in Western Australia rather than a one size fits all approach.

## **Higher density development can provide unique opportunities to increase public amenity**

Higher density developments have less surface area on the ground and thereby can create opportunities for more public amenity and public access to facilities and recreation areas in and around the development.

Higher density development can also act as a key catalyst for the renewal of and investment in coastal locations through developer contributions as a ‘trade off’ for allowing additional height.

Higher density development also provides extensive opportunities to incorporate mixed uses such as restaurants and shops that attract locals and tourists, boosting the local economy. These kinds of areas in Western Australia are extremely popular due to the community’s desire to recreate along the coast. This type of development can be particularly appropriate for areas/coastal nodes which are in need of upgrading such as Scarborough.

## **Height limits can have affordability impacts**

There are heights above which multi storey buildings become less cost efficient and therefore potentially less affordable. Occupants of developments above 3 storeys in height generally require the provision of lifts. FESA prescribes the need for a fully sprinklered building where the floor level of the highest apartment at its entrance is any higher than 25m above the ground level at the building’s exit point, thereby limiting a typical unsprinklered residential apartment building to 9 storeys (or 10 storeys if the top floor is a mezzanine with its lower floor entrance at 25m or less).

Therefore, for apartment buildings higher than 3 storeys, the cost of a lift or lifts will need to be borne by the development. Needless to say, the more apartments – and therefore the more storeys this cost can be amortised over, the better. Therefore most developers will want to progress the building to the 9-10 storey model, being the next cost efficient limitation.

For developments over the 25m limit, once again cost efficiencies will dictate that, once building higher than 25m, the sprinklering of the whole building and the likely need to provide additional lifts to cater for the additional number of apartments will mean that most developers will want to make the building comprise as many storeys as possible.

Some may argue that development along the coast is generally on premium property and that affordability is not an issue, however coastal development should not be forced toward servicing only an elitist market when a sensible approach to coastal planning could accommodate the more cost efficient design models as noted above.

## **Conclusion**

UDIA supports the implementation of an overarching guideline for development along the coast that incorporates all of the aspects of urban design including form, height, foot print, scale, massing, amenity, external appearance (such as colour) and materials used.

UDIA believe that an overarching approach such as the state governments in NSW and Victoria have taken will have more of an impact in ensuring appropriate development along the coast than implementing a blanket height restriction. A one size fits all approach does not take into account the uniqueness of different areas along the coast in Western Australia and the positive impact that some higher development may have in certain areas.

Thank you for the opportunity to provide comment on the State Planning Policy 2.6 – State Coastal Planning Policy. UDIA would appreciate the opportunity to work with government to ensure that sustainable forms of development can occur along the coast to the benefit of the community and industry as a whole.

Yours sincerely

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