



13th May 2005

Mr Charles Johnson
Chief Executive Officer
City of Wanneroo
Locked Bag 1
WANNEROO WA 6946
By fax to : 08 9405 5098

Dear Mr Johnson,

SUBMISSION ON CITY OF WANNEROO SMART GROWTH ASSESSMENT TOOL

The Urban Development Institute of Australia (UDIA) is the peak body representing the urban development industry in Western Australia. It is in this capacity that we offer our comments on the proposed City of Wanneroo *Smart Growth Assessment Tool* (SGAT).

The urban development industry is a key contributor to sustainable development practices in Western Australia and UDIA members are increasingly adopting principles of sustainability as part of their corporate philosophy and practices.

UDIA supports the principle of sustainability assessment in Western Australia and believes that this type of assessment could provide a useful guide to promote more economic, social and environmentally sustainable development and building practices in the state. In this regard we congratulate the City of Wanneroo on the preparation of SGAT.

However, we would like to make a number of suggestions which we believe would assist in alleviating industry concerns and in ensuring the smooth implementation of the tool.

Formal Review Period

A number of UDIA members have expressed concern that the implementation of SGAT will be onerous for developers and their consultants. Despite this members have indicated that they would not object to undertaking the assessment if compliance with the tool provided them with some certainty of outcome.

To assist in obtaining increased support for the process we suggest that the City to commit to a formal review and subsequent assessment of the tool prior to implementation on a mandatory basis.

In this regard we make the following suggestions:

- It is requested the City implement SGAT on a voluntary basis for a 1 to 2 year period to provide the opportunity for comprehensive review of any issues associated with implementation from both the proponent's and city's perspective and to identify and correct any identified problems with the tool or the implementation process.
- We recommend that review period focuses on the implementation of the tool at district and local structure plan level in the first instance (prior to reviewing the tool at subdivision level). We believe that this will provide the greatest opportunity for the assessment of a development in a holistic framework as well as for negotiation between the City and the proponent.
- UDIA recommends that the City of Wanneroo uses the review period to demonstrate the benefits of the tool to industry and obtain project examples of how the tool has assisted

industry members in the approval process, particularly in regards to providing greater certainty of outcome.

- It is recommended that the City use the implementation period to demonstrate to industry that internal practices have been modified to allow for the efficient implementation of the tool. This includes changes in practice to allow for the multidisciplinary assessment of proposals and to demonstrate the ability for industry representatives to negotiate with council officers for 'trade offs' between different elements/requirements.
- At the finalisation of the review period the City should undertake an assessment of the effectiveness and efficiency of the tool based on comprehensive feedback from Council, Council staff and all participating industry members.

Work Sheet Recommendations

In addition UDIA makes the following general recommendations in regards to making the assessment worksheet more 'user friendly':

- Increase the explanatory text in the spreadsheet scoresheet (so that it is clear what particular scores or star ratings mean). Include a clear explanation of how a score or number of stars achieved by a development will impact on the approval process.
- Review the worksheet to ensure that it is as simple as possible (the initial reaction of industry members to the tool has been that it is very complex).
- Review the questions to ensure that all of the questions can be applied to all types of development without undue bias to the assessment score. For example, ensure that the scorecard can apply to semi-rural development where this type of development is appropriate as easily as transit oriented or compact forms of development (for example).

Conclusion

In conclusion, UDIA supports the City of Wanneroo's vision to enhance sustainability and make sure new developments complement the cities Smart Growth Strategy.

However we believe that in adding additional layers to the development process there is a need for the City to clearly identify and demonstrate the benefits of the assessment for Council, industry and the community as a whole.

To achieve this we request that the City of Wanneroo commits to a formal review and subsequent assessment of the Smart Growth Assessment Tool prior to implementation on a mandatory basis.

Yours sincerely,



Marion Fulker
EXECUTIVE DIRECTOR