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30th September 2008

Mr. Michael Schramm
Director South West Planning
Department for Planning and Infrastructure
6th Floor, 61 Victoria Street
BUNBURY WA 6230

By email: bunbury@dpi.wa.gov.au

Dear Mike

Re: SOUTH WEST FRAMEWORK

The Urban Development Institute of Australia (UDIA WA) is pleased to provide feedback to the Department for Planning and Infrastructure on the draft South West Framework. UDIA is the peak body representing the property development industry in Western Australia with a membership drawn from the land development, planning, engineering, environmental and urban design professions. Comments have been provided by members who have interests in the South West and from UDIA's own analysis of assumptions made in the document.

UDIA would like to express general support for the Framework which is designed to guide policy and decision making in the SW region. We would like to draw your attention to the following.

Settlement Strategy

There appears to be a disjunct between areas zoned for urban development in the Greater Bunbury Region Scheme and the Settlement Strategy. The omission of Vasse New Town, which is designed to accommodate 5,000 residents and 1,500 jobs, as an urban centre with high growth potential is a serious oversight and throws into question the rigour of the Settlement Strategy. Similarly, Binningup is shown as having 'low growth' potential which does not reflect the local planning scheme or its urban zoning in the GBRS. UDIA members have extensive landholdings in the area which are targeted for development and therefore contradict the outcomes detailed in the Settlement Strategy.

UDIA members are concerned that the South West Framework has been developed without consultation with the development industry. We recommend that the Settlement Strategy be reviewed to better account for developer intentions and the growth potential of designated settlements and to better reflect zonings of the GBRS.

Population Growth

In light of the above, UDIA has reservations about the anticipated population growth for centres detailed in the Settlement Strategy. The population and growth trends appear to be based on

historical patterns rather than on a forward-looking analysis reflecting what is already happening on the ground (for example, Vasse New Town).

It is well documented that the South West region is one of the fastest growing regions in Australia with data indicating 3.3% pa growth between June 2004 and June 2005 (ABS 3218.0 – Regional Population Growth, Australia), double the state average. Forecast growth of 4% Average Annual Growth Rate to 2021 will result in:

- 35,000 new jobs
- 80,000 people
- 22,500 new dwellings (1,700 per year)

(Source: South West Development Commission)

If the SW Framework is to usefully guide policy and decision making in the South West it must be rigorous and fully account for the growth potential of the region. UDIA recommends the population and growth trends be reviewed. It would be useful to develop different growth scenarios so that a range of possibilities is considered. This reduces risk and allows and plans to be adjusted according to prevailing conditions.

Broader consultation

UDIA suggests that the value of the Framework will be strengthened by broad engagement with industry so that it fully captures the growth potential of the region. Our members have expressed concern that the taskforce that has put together the Framework has involved only State and Local Government Agencies with no consultation with the development industry. There is a broad range of players whose activities are responsible for regional growth and it is our view that the Framework would benefit from input from these players. Industry is keen to form a dialogue with the relevant agencies, particularly DPI and DEC, to better manage the challenge of future growth.

I trust you will give these comments due consideration when reviewing the SW Framework.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Debra Goostrey', with a stylized flourish at the end.

Debra Goostrey
Chief Executive Officer