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Ms Mersina Robinson  
Project Manager Scheme Review  
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### **Shire of Busselton Local Settlement Planning Strategy, Report 1 - Profile**

Dear Ms Robinson

The Urban Development Institute of Australia (UDIA WA) is pleased to provide the following comments on the draft *Shire of Busselton Local Settlement Planning Strategy, Report 1 – Profile* (the report) and we appreciate you extending the comment period to accommodate our feedback.

#### **General Comments**

UDIA is disappointed with the quality of the report. The analysis lacks depth and in our view is not sufficiently rigorous to support evidence-based decision making the LSPS requires. The data utilised are out of date, offer a limited range of sources and are not consistently referenced.

The demographic analysis provided in the report simply describes the Shire as it was in 2006 and provides no clear understanding of the future population, its age structure or household type broken down by customised small areas. This level of analysis is imperative if the LSPS is to provide certainty in informing the housing, transport and infrastructure strategies that form part of it.

The report should include detailed demographic forecasts by small area which will underpin the Shire's ability to understand different population outcomes across the LGA; identify local needs and priorities, and importantly to provide the evidence required to access funding for infrastructure.

The development industry also needs certainty if it is to provide sufficient, affordable, well located and diverse housing choices to the community. The ability to do so is predicated on a clear understanding of the future population and housing needs. There are products available that do provide local governments with detailed population forecasts and we would recommend that the revised report be based on modelling that delivers accurate and relevant population forecasts for small areas.

## Specific Comments

- The maps determining the areas for future development potential and identifying suitable or other possible townsites for future expansion lack clarity and need to be redrafted;
- The methodology used to determine Labour Force Projections (Table 10.3) based on the 2006 labourforce participation rate is simplistic and makes no allowance for changes in the structure of the population;
- Similarly, the methodology utilised to determine future dwelling requirements (Table 10.5) is based on current occupation patterns. The analysis should include housing consumption patterns based on how households and dwelling stock are changing, who is living in what type of dwelling and how the age structure is changing. This will allow the Shire to respond to these shifts so that new dwellings will meet the new demands;
- There is a lack of innovation in the documentation with respect to addressing how Dunsborough can expand in relation to higher density, road layout, identifying future development areas and being consistent with the Leeuwin-Naturaliste Ridge SPP;
- The LSPS appears to address existing approvals only (Table 10.8) and does not consider any future approvals in the Shire resulting in a no change scenario;
- The LSPS focuses on Busselton and Dunsborough as the key settlements and there is a lack of consideration of other possible locations. UDIA questions why Jarrahwood is identified as a townsite for future growth in preference to other townsites such as Wonnerup;
- For the LSPS to provide an effective planning framework it is incumbent on the Shire to resolve the inconsistencies that exist between Statement of Planning Policy 6.1 Leeuwin-Naturaliste Ridge Policy, the South West Framework and the Shire's Town Planning Scheme No. 20.
- The Dunsborough Structure Plan (1990) should be updated to make it a more strategic document that will take Dunsborough forward and accommodate growth in a way that is acceptable to the community;
- The LSPS should have the flexibility to respond to variations in population growth rates over the life of the strategy and extend to new settlements should demand dictate. The LSPS should also acknowledge that not all newcomers to the Shire will necessarily want to live in Busselton or Dunsborough and better outcomes will be achieved if a diversity of development and housing options is available to attract newcomers to the Shire;
- The LSPS process will benefit from input from developers who may have alternative development options that currently sit outside planning policy;
- The Shire should consider performance based development for areas outside the designated growth areas to manage growth that enhances the high environmental and landscape values of the Shire and meets stringent environmental, social and economic conditions for approval. If a development does not meet the required standard, it is not approved. UDIA is working closely with the Department of Planning on developing sustainability criteria for the rezoning of future urban land in Perth and Peel and this work could be adapted to the LSPS.

UDIA has serious reservations about the value of this report to the Shire and we caution against it being used to inform the review of the Shire's Town Planning Scheme No.20. While it provides a comprehensive overview of the demographic profile of the Shire in 2006 the methodology is limited in the value it provides to the Shire to inform the LSPS. The report promotes business-as-usual, it will not allow the Shire to move forward, to innovate or to create opportunities for newcomers.

We trust the Shire will give due consideration to the comments when reviewing the draft report.

Yours sincerely

A handwritten signature in black ink, appearing to read "Debra Goostrey". The signature is stylized with a large initial 'D' and a trailing flourish.

Debra Goostrey  
Chief Executive Officer