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Industrial Land Strategy 2009: Perth and Peel
Department of Planning
469 Wellington Street
Perth WA 6000

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

Dear Sir/Madam

INDUSTRIAL LAND STRATEGY 2009 PERTH AND PEEL

The Urban Development Institute of Australia (UDIA WA) would like to thank you for the opportunity to comment on the State Government's draft *Industrial Land Strategy 2009 Perth and Peel (ILS)*. UDIA supports the initiatives of the ILS as delivering industrial land to the market is a difficult process and requires a coordinated strategy to ensure relevant infrastructure and services are available to support industrial development and the Western Australian economy.

The key issues for UDIA are:

- Role of employment
- Impact of proposed extension of industrial areas on potential residential development
- Service infrastructure
- Concurrent scheme amendments
- Technical reporting
- The role of LandCorp
- Consolidation of the approvals process

Role for Employment

We support the assessment criteria used to identify possible industrial land parcels, and would encourage the inclusion of an additional criterion that acknowledges the reciprocal relationship between the residential population/workforce and the industrial area. The criteria should not only examine the proximity of a potential workforce to a potential industrial site, but should also examine the benefits of employment generation created by an industrial area on the surrounding current and future residential areas. A case in point is the proposed priority industrial site at Bullsbrook South whose development will advance future residential development in the north east corridor supported by major transport infrastructure.

Impact of proposed extension of industrial areas on potential residential development

The corollary to the above is the impact of proposed industrial areas on adjacent land that is zoned urban. The ILS must not reduce the residential development potential of urban zoned land through the application of buffers or other planning controls. The proposed priority industrial site at North Baldivis (page 45) will potentially reduce the development potential of the urban land to the north of the proposed site which is located in Perth's burgeoning south west growth corridor. Similarly, the proposed Greenlands Road priority site in the Shire of Murray will have a detrimental impact on the future urban development potential of West Pinjarra. The Peel region and the Shire of Murray in particular are under intense development pressure with increasing rates of population and household growth projected for the coming decades. UDIA supports the Shire of Murray's submission on the ILS which proposes a westward extension of the West Pinjarra Light Industrial Area and a mixed business industrial corridor north and south of Greenlands Road. This will provide sufficient industrial land to meet future demand and at the same time maximise the residential development potential of West Pinjarra, designated future urban. For more detail on the Shire of Murray's proposal, please refer to the Shire's submission on the ILS.

The latest Australian Bureau of Statistics data (3218.0 – Regional Population Growth, Australia, 2008-09) indicate a population of 3.8 million for Perth and Peel by 2050 which highlights the imperative for residential zoned land to be developed to its maximum potential. Further planning and investigations of proposed industrial sites must assess the impact of industrial land use on future residential development in adjacent areas in order that opportunities for residential development are not irrevocably impacted by industrial activity.

Service Infrastructure

There appears to be a lack of commitment from service providers to include servicing of the priority areas within the short term infrastructure planning process. Successful implementation of this strategy requires a government commitment to service delivery. To require private developers to pre fund infrastructure is likely to be prohibitive to development of the land in the short term. Government, in conjunction with service providers needs to take ownership of service infrastructure provision and, where appropriate, recover costs through development contribution schemes or similar once the land is serviced. This could be reinforced by an improved role of the Infrastructure Co-ordination Committee.

Concurrent Scheme Amendments

In order to facilitate development of each of the priority sites identified in the ILS, amendments are required to both the Metropolitan Region Scheme (or Peel Region Scheme in the case of Greenlands Road) and the relevant Local Planning Scheme. The *Planning and Development Act 2005* does not allow for concurrent MRS/LPS amendments unless the proposal relates to land zoned Urban (section 126). If the Government is committed to implementing this strategy and prioritising the development of particular sites, then the rezoning process should be streamlined to allow concurrent MRS/LPS amendments to zone land for industrial purposes.

Technical Reporting

The amendment and structure planning processes for each of the priority sites will require a significant amount of supporting technical reports and justification to ensure that the site constraints have been appropriately addressed. While the need for the technical reporting is

understood, it is important that the level of technical input is matched to the appropriate stage in the planning process. Unnecessary and costly delays often occur in the land development

process due to approval agencies and referral agencies requiring specific and detailed information in the early stages of the planning process, where such issues can be and should be addressed at a later stage. To overcome this issue, the level of reporting should be matched to the correct stage of the planning process through a state wide strategy or policy in a similar manner to the WAPC's Better Urban Water Management document.

The role of LandCorp

UDIA supports LandCorp acting as a facilitator to industrial land development by being the State Government instrument that coordinates the infrastructure provision of the major service agencies. The mechanics of this role should be included as part of the implementation of the ILS.

UDIA does not support the proposal for LandCorp to trial a delivery model to facilitate estate development where there is fragmented ownership (Table 6: Recommendation and actions for the industrial land strategy). It is untenable that landowners should relinquish their development opportunity to LandCorp without understanding the terms under which this would occur. More detail is needed on the scope of LandCorp's role; under what circumstances would resumption be proposed; the role of landowners in the development.

Proposed Consolidation of the Approvals Processes

The ILS suggests an improved and coordinated approach to fast track planning and environmental approvals for industrial land development. This is a laudable objective and theoretically would have the support of the development industry if the government could demonstrate that this is achievable. The ILS requires greater clarity on how a consolidated approvals process for industrial development is to be achieved.

Conclusion

UDIA is supportive of the ILS but there is a need for greater clarity around the issues highlighted in this response. The ILS must be mindful of the impact of industrial development on potential residential development and not advance the former to the detriment of the latter, particularly given the significant growth projections for Perth and Peel. The role of LandCorp also needs to be clarified as it is unlikely that the development industry will accept government intervention by an agency where it is widely accepted that the private sector performs more than adequately in project management, design and procurement of approvals processes.

We trust you will give due consideration to this submission.

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