

12 December 2017

Draft Leeuwin Naturaliste Sub-regional Planning Strategy
Regional Planning Policy
Department of Planning, Lands and Heritage
Locked Bag 2506
PERTH WA 6001

Via email: leeuwin.naturaliste@planning.wa.gov.au

To whom it may concern

DRAFT LEEUWIN NATURALISTE SUB-REGIONAL PLANNING STRATEGY

Thank you for the opportunity to provide feedback on the Draft Leeuwin Naturaliste Sub-regional Planning Strategy. The Urban Development Institute of Australia (UDIA) WA is the peak body representing the urban development industry in Western Australia. UDIA is a membership organisation with members drawn from the development, planning, valuation, engineering, environmental, market research and urban design professions. Our membership also includes a number of key State Government agencies and Local Government Authorities from across the state. Nationally, UDIA represents the interests of thousands of members, including all of the major land and built-form development companies, and consultancy firms.

UDIA welcomes the WA Planning Commission's efforts to provide an overarching sub-regional strategy outlining the development priorities for the Leeuwin-Naturaliste sub-region. Whilst the Strategy is comprehensive and examines a wide variety of issues, we consider it is currently unnecessarily long and cumbersome, with over one hundred policy positions and actions.

As such it is difficult to readily identify the key long-term land use planning priorities for the sub-region. The absence of a 'plan period' also adds to this short-coming and although the Strategy lists infrastructure considerations, it fails to provide an actual infrastructure plan or identify priorities. It is important that these issues are addressed to ensure that the Strategy can be clearly understood and remains relevant to all stakeholders.

The Institute is deeply concerned by the Strategy's failure to provide accurate population forecasts, land supply calculations and projections of employment growth and employment land needs. These are fundamental considerations that will need to be resolved prior to finalising the Strategy.

Due to the absence of data, the Institute is concerned that the supply of residential land identified is insufficient to meet the sub-region's needs. This is likely to result in increased housing affordability pressures, which as the Strategy identifies, is already an issue facing the sub-region.

Similarly, UDIA queries whether of the supply of employment and industrial land is adequate for sub-regional needs. Without an evidence base to confirm land supply needs, it is worrying that the Strategy

seeks to restrict a variety of development forms such as rural residential whilst also removing 'Development Investigation Area M5' to the east of Margaret River. Unless robust land supply evidence can be provided, all development proposals should be judged on their individual merits.

In addition, the Strategy promotes urban infill whilst failing to provide actual evidence or references for its claim that *'studies that have demonstrated it is significantly more cost effective for the Government to deliver, upgrade and maintain infrastructure within adjoining urban areas rather than provide new services for greenfield areas'*.

There are a number of inconsistencies and contradictions within the document and between the Strategy and other planning documents. For example, page 30 of the Strategy states that approximately 220ha of land surrounding the Busselton-Margaret River Airport has been identified as future industrial land whereas Map Sheet 2 shows in excess of 1,000ha. The draft Strategy should be carefully reviewed to remove these inconsistencies.

Finally, as previously stated, the unwieldy nature of the Strategy is demonstrated by its setting out of over one-hundred policy positions across four themes. Many of these positions conflict one another and it is difficult to identify what the priorities are. As well as rationalising these positions and actions, UDIA seeks clarity on the following policy positions:

7.1.1 c)	The need to review existing approved structure plans and what constitutes 'contemporary innovation and design principles'?
7.1.1.2 d)	How will the WAPC ensure new development takes into account the total lifecycle cost, cost of living, and impact on social, economic and environmental factors?
7.1.2.1	How the statement that <i>'the WAPC's support for strategies plans and developments that adopt a primary position for no further clearing of vegetation should not be interpreted to mean the WAPC is against clearing of native vegetation, nor has a strong preference for any development to occur on cleared land'</i> will be interpreted.
7.1.2.3 d)	The necessity to retain all mature vegetation in proposed greenfield development areas only and whether the same restriction will apply to infill areas
7.1.3.3	What are the appropriate measures in the Strategy to deal with the cumulative impacts of development on the environment, agricultural productivity, tourism attractions and other employment generators

UDIA trusts that these comments will assist in the finalisation of the Strategy. Should the Department require any further information regarding these comments, please contact Chris Green, Director of Policy and Research at cgreen@udiawa.com.au or 9215 3400.

Yours sincerely

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