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Mathew Selby
East Wanneroo District Structure Plan Feedback
Department of Planning, Lands and Heritage
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Via email: ewdsp@dplh.wa.gov.au

Dear Mathew

Draft East Wanneroo District Structure Plan

Thank you for the opportunity to provide feedback regarding the *Draft East Wanneroo District Structure Plan*. The Urban Development Institute of Australia (UDIA) WA is the peak body representing the development industry in Western Australia. UDIA is a membership organisation with members drawn from the residential, commercial and industrial property development sectors. UDIA members include both private and public sector organisations. Our industry represents approximately 10.1% of Western Australia's Gross State Product, contributing \$27.8 billion annually to the Western Australian economy and \$270.5 billion nationally. As well as helping to create sustainable and liveable communities, the industry employs a total of 205,100 Western Australians and 2.023 million Australians across the country.

As Perth continues to grow, it is essential that there is a sufficient supply of land for development purposes, to help ensure that housing remains affordable and the competitiveness of our economy is maintained. Therefore, given its unprecedented large scale, the successful implementation of the East Wanneroo District Structure Plan (EWDSP) is critical not only to the future prosperity of Perth's North-West corridor, but also the wider Metropolitan Region.

It is clear that unlocking of development of the scale of the EWDSP presents significant challenges. Therefore, UDIA congratulates the WA Planning Commission and Department of Planning, Lands and Heritage for the preparation and release of this comprehensive district level Structure Plan, which sets out an ambitious vision for East Wanneroo. We believe that the EWDSP appropriately seeks to protect and enhance the area's significant environmental, cultural and landscape values whilst also providing for the future needs of the community. Nevertheless, despite being supportive of the draft Structure Plan, UDIA has a number of strategic concerns which we respectfully request be addressed prior to its adoption.

Infrastructure Provision

Given its large scale, the EWDSP will give rise to significant infrastructure requirements. However, funding details are absent from the EWDSP, which states that a "*Development Contribution Plan for the entirety of the district structure plan area is to be prepared by the City of Wanneroo.*" This, and the absence of any infrastructure funding detail or guidance, raises significant concerns about the successful implementation of the EWDSP.

The Institute is particularly concerned that the burden for funding the required infrastructure will fall entirely upon new home buyers within the East Wanneroo area. Whilst acknowledging that infrastructure details have not been provided, it is important that the establishment of any future Development Contribution Plan (DCP) fully aligns with the provisions of the recently released draft State Planning Policy 3.6 - Infrastructure Contributions (SPP3.6). As such, UDIA strongly recommends that the future application of DCPs be limited to infrastructure entirely contained within the physical extents of each development precinct, in order to fully satisfy the 'need and nexus' and 'certainty' principles of SPP3.6. This will ensure that the development precinct's development timings align with the policy's 10-year time horizon for the delivery of infrastructure and help to guarantee that new home buyers directly benefit from the infrastructure items that they have funded. Furthermore, because of its scale and development timeframes, a single, district-area wide DCP is likely to be overly complicated and unworkable. Instead, the regional scale of the EWDSPP and its potential impact upon the wider State economy means that State and Federal funding should be used to provide for regional infrastructure requirements in East Wanneroo.

Alongside concerns regarding infrastructure funding, the Institute is concerned that the proposed dwelling yields appear to be overly optimistic, which will undermine the plan's objectives and the long-term sustainability of infrastructure within East Wanneroo. The Institute also notes there is very little difference between the gross density targets set out in Table 2.6, despite the different density aspirations, particularly between the density targets for Neighbourhood Centres, Urban Neighbourhoods and Character Areas.

In addition to concerns about the funding of infrastructure, the Institute is also apprehensive that efforts to minimise the impact of infrastructure on development yields, and therefore total development costs, have not been appropriately identified or considered by the EWDSPP. For example, the East Wanneroo Rail Link includes a 70m wide corridor, which is approximately twice the width of the existing rail corridor in Butler. Similarly, arterial road networks, which the EWDSPP states will typically be 35m wide, is almost the same width of the Kwinana Freeway in Como, which at 42m wide, also includes the Mandurah Train line. UDIA notes that Appendix E, East Wanneroo District Rail Alignment report notes that *"a 50m width reserve has been shown on the drawings adjacent to the rail reserve to accommodate a future distributor road"*. This brings the total road and rail transport corridor width to an excessive 130m. The sterilisation and loss of land for development purposes will add significantly to the cost of development and undermine the density targets that the EWDSPP seeks to achieve. Whilst recognising that detailed road and rail alignments may not be appropriate at this stage in the planning process, further detailed studies and local planning instruments should seek to ensure that infrastructure uses land efficiently with surplus infrastructure land returned for development purposes.

Similarly, the Institute is also concerned that the proposed sinking of the rail line below ground does not appropriately consider the projected increase of groundwater, which would add further significant costs to the provisions of rail infrastructure.

Recommendations

- That the application of Development Contribution Schemes is limited to the EWDSP's development precincts to ensure the need and nexus principle of SPP3.6 is fully satisfied.
- That State and Federal Government Funding is sought to support the delivery of infrastructure within the EWDSP sub-region.
- That infrastructure corridors use land efficiently and are thoughtfully designed to minimise development costs.

Hydrology and Groundwater Management

The management of East Wanneroo's water resources and the transition from water intensive land use to urbanisation presents significant opportunities and challenges for the EWDSP. Indeed, the development outcomes achieved in East Wanneroo will largely be determined by the response to hydrological and groundwater conditions. Therefore, the Integrated Water Management Framework (IWMF) is a critical document that will underpin the successful implementation of the EWDSP.

UDIA notes that the IWMF proposes the reclassification of the Priority 1 Public Drinking Water Source Protection Area (PDWSA) to a Priority 3* PDWSA to allow for urban development to occur. However, it should be clarified within the IWMF and EWDSP what development activities are restricted from occurring within a P3* area, including the wellhead protection zones. Furthermore, Figure 3 of the IWMF shows wellhead protection zones extending outside the boundary of the PDWSA. UDIA suggests that these should be amended so that the wellhead protection zones are fully contained within the PDWSA as per Water Quality Protection Note 25.

As previously highlighted, effective groundwater management is critical to achieving successful development outcomes for East Wanneroo. Therefore, UDIA is particularly concerned about the accuracy of the groundwater modelling used. The Institute acknowledges that the IWMF states that further groundwater modelling needs to be undertaken to support the District Water Management Strategy beyond the PRAMS model. However, whilst the PRAMS model is a valuable tool for assessing groundwater allocations, it is not generally used for assessing urban development and land-use change. The application of PRAMS for assessing urbanisation outcomes, raises legitimate concerns about the accuracy of the modelling forecasts. Accordingly, UDIA strongly recommends that the proposed modelling exercise be undertaken using a fit-for-purpose, and more refined model that will accurately account for land-use change and outline the potential implications for future development. This modelling exercise should be undertaken at the District Scale and be finalised prior to the development of Local Structure Planning.

Similarly, the Institute is concerned that very little information is provided with respect to the PRAM model, its calibration, scenario and final results. Therefore, it is not possible to undertake a robust technical review of the model's outcomes. UDIA respectfully requests that further information is provided prior to undertaking further modelling work, so this can be interrogated along with the resulting groundwater information.

The IWMF also suggests using the same inputs and parameters used in the PRAMS model, which we consider should be undertaken with caution until the inputs and parameters used are made available. It is vital that all parameters and inputs are adequately calibrated to ensure robust modelling results.

Although the groundwater rise is discussed as increasing 3-4m, Figure 14 indicates groundwater rise up to 4-5m. The *“East Wanneroo integrated groundwater-lake flow modelling: Predictive scenario modelling to support the Gnangara Sustainability Strategy”* (Department of Water, 2009) reported similar modelling cases but yielded water level rises in Lake Marginiup of up to 0.4 m and in Lake Jandabup of up to 0.7m. The groundwater rises presented in the IWMF are substantially different to this previous modelling, again raising legitimate questions in relation to the calibration and parameters used in the PRAMS model.

If the groundwater rise will indeed be up to 4-5 metres in proposed development areas (including town centre precincts), a state-led solution should be included in the EWDSF outlining the proposed control mechanism to deal with this issue as it evolves. It is not appropriate for Precinct Structure Plans to resolve this potential risk, as a regional solution will be required.

UDIA also notes that the suggested groundwater rise of 4-5m would also inundate existing residential areas and infrastructure which has not been reflected in the EWDSF.

UDIA is also concerned that the IWMF does not discuss groundwater allocations for the irrigation of POS as a result of urbanisation. It is imperative that this is addressed to ensure the future community is provided with appropriate amenity.

UDIA is supportive of the Drainage Management Principles and the infiltration of stormwater for drainage management post-development.

Recommendations

- That the PRAMS modelling inputs and parameters used in the PRAMS model be made fully available.
- The proposed further groundwater modelling exercise(s) be undertaken using a fit-for-purpose, refined model that will accurately account for land-use change and outline the potential implications for future development.
- Consultation is undertaken with the development industry to ensure the accuracy of parameters and inputs used to calibrate groundwater modelling.
- Wellhead protection zones are fully contained within the PDWSA as per Water Quality Protection Note 25
- Further details regarding the irrigation of public open space is provided.

Environment

The EWDSP notes that the proposed rehabilitation strategy, if appropriately implemented, could improve the condition of the Pinjar complex vegetation as well as potentially expand its current extent within foreshore reserve areas. It is noted that typical costs for rehabilitation of natural vegetation systems are significant and are becoming increasingly costly. Whilst the funding arrangements to provide this rehabilitation have not been identified, as the desired outcome provides regional scale benefits, rather than just local benefits (i.e. improvement of the Pinjar vegetation complex on the Swan Coastal Plain which currently has 1,452ha, out of an original 4,892ha, remaining; based on DBCA 2017 statistics), funding this rehabilitation should not be placed entirely on individual land owners.

The EWDSP identifies 'Priority Areas for Further Investigation' and 'High Priority Areas for Further Investigation'. Priority areas are identified to include potential Swan Coastal Plan community type 20a Threatened Ecological Community (TEC) vegetation. The high priority areas are a sub-set which identifies those with higher priority for retention based on composition, size and connectivity. The 'Priority Areas for Further Investigation' are not identified as future open space in the DSP. Therefore, UDIA requests confirmation that this position has been discussed with the EPA / EPA Service branch of DWER to confirm they support the loss of some TEC vegetation to facilitate the outcomes desired by the EWDSP. If this is not supported, UDIA recommends that the priority areas also be identified as potential parklands subject to further investigation, so as not to give landowners an incorrect impression that these areas are not possibly constrained.

In addition, there are also smaller areas of SCP 20a TEC mapped (i.e. less than 3ha in size; see Figure 2 of the Environmental Assessment of Proposed Outcomes report), which are not identified as either priority or high priority areas for further investigation. As with the previous comment, the EPA's position regarding the clearing of these areas has not been established, and as such this may not be able to occur.

Recommendations

- That State and Federal funding is sought to assist the rehabilitation of native vegetation.
- That the EPA's position regarding the clearing of TEC vegetation be explained. Where this is not supported, environmental priority areas be identified as potential parklands.

Other Comments

Vision

The EWDSP is designed around two main centres that are based on rail station locations and a preferred rail alignment. This is strongly supported, however the EWDSP would benefit from additional detail that explains how the plan can be implemented ahead of (or in the absence of) formal commitment to build the rail. It is difficult to see how the District Centre or Neighbourhood Centre would be planned and developed at the densities contemplated without specific public transport support. While Section 6.3.2 comments on the EWRL, the EWDSP has no detail around perhaps a transitional public transport arrangement that might allow a rapid bus service to mirror some of the future rail route.

Landowners want to understand how the EWDSPP contemplated densities and land use mix can be achieved in the absence of known transport options. Similarly, the community facilities contemplated will function best if co-located with public transport.

Staging

The western edge precincts are able to be progressed early, while the remaining majority of the EWDSPP area may take time given the range of servicing, hydrology and other constraints. Precinct areas would be best aligned to coincide with a single stage.

Should the Department require any assistance or further information regarding this matter, the UDIA would be delighted to assist. Should any further information be required in relation to the comments above, please contact Chris Green, Director Policy and Research at cgreen@udiawa.com.au or 9215 3400.

Yours sincerely



Tanya Steinbeck
Chief Executive Officer