

3 March 2021

Design WA team
Department of Planning, Lands and Heritage
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Via email: designwa@dplh.wa.gov.au

To whom it may concern,

Draft State Planning Policy 4.2 - Activity centres

Thank you for the opportunity to provide feedback in relation to the above *Draft State Planning Policy 4.2 - Activity centres*. The Urban Development Institute of Australia WA (UDIA WA) is the peak body representing the property 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 9.3% of Western Australia's Gross State Product, contributing \$28.2 billion annually to the Western Australian economy and \$267.6 billion nationally. As well as helping to create sustainable and liveable communities, the industry employs a total of 205,100 Western Australians and 2.035 million Australians across the country.

General Comment

UDIA WA welcomes the release of the draft State Planning Policy (SPP) 4.2 Activity Centres and its supporting Implementation Guidelines. It is vital that the SPP remains consistent with the wider planning policy framework, particularly SPP7.1 Neighbourhood Design/Liveable Neighbourhoods and SPP7.2 Precinct Design.

Through the Government's 'Our Priorities' agenda, the METRONET program and the Perth and Peel @3.5m Sub-regional Framework's urban infill targets, the State has set out a clear agenda to focus development and increase density within activity centres. As such, UDIA fully supports the policy outcomes that the SPP seeks to achieve, specifically, ensuring the primacy of activity centres in the planning hierarchy together with ensuring that our centres are designed well to maximise density and diversity of housing and improve land efficiency. To support the delivery of the Policy's desired development outcomes, UDIA suggests the following amendments to the draft SPP.

Policy Triggers/Implementation

UDIA wishes to reaffirm the advice contained in our submission responding to the draft SPP7.2 and express our concerns regarding the policy's implementation and in particular the thresholds which trigger the application of the policy's requirements. The draft SPP's requirement for a precinct

structure plan to be adopted and endorsed by the WAPC prior to major development being approved in secondary, district and specialised activity centres will create uncertainty and cause significant delay, jeopardising investment and jobs in the very centres that the policy seeks to encourage development. Although the policy states that *‘major development may be considered in the absence of an endorsed precinct structure plan where exceptional circumstances are fully evidenced and justified’*; the floor space thresholds used to define major development are modest and the policy identifies a total of 104 strategic, secondary and district centres in the Metropolitan region and a further 9 in Greater Bunbury. As such, whilst creating uncertainty for industry, the requirement for precinct structure plans to be endorsed by the WAPC will have significant resource implications for both the State and local government.

Recommendation:

- The threshold definitions of major development are revised to better support and encourage development in activity centres.

Implementation and Maintenance of Precinct Structure Plans.

Although the Policy does not preclude the private landowners from preparing precinct structure plans, the policy requirements clearly assume that local government will be responsible for preparing such plans. As such, the Institute queries how the WAPC will ensure local government compliance with the Policy and make sure that the sector proactively seeks to prepare and adopt precinct plans. Similarly, the draft Policy is not supported by an implementation plan, and no funding or resource appears to be allocated to local governments or landowners to support the preparation of such plans. Local government compliance is a significant concern given the highly fragmented nature of land ownership within most activity centres. As such, the co-ordination and resourcing needed to satisfy the draft SPP’s policy requirements between multiple landowners, mean landowner/developer led precinct plans are unlikely to come forward.

UDIA also notes that whilst both the draft SPP4.2 and SPP7.2 focus on the establishment of Precinct Plans for Activity Centres, they offer little guidance or advice regarding how these plans should be reviewed or how long they remain valid for. To achieve the policy’s objectives and encourage and maximise development opportunities in activity centres, it is critical that precinct structure plans remain contemporary. To support this, an efficient review process is required that enables minor amendments or amendments that support desirable development outcomes to be undertaken quickly and efficiently.

Recommendation

- That the WAPC engage with all stakeholders including the development industry, to prepare Implementation Plan for SPP4.2 Activity Centres and SPP7.2 Precinct Design.
- That the WAPC establish appropriate procedures for ensuring compliance with the policy including an efficient review and amendment process for Precinct Plans.

Density Targets

The current (2010) SPP has minimum and desirable density targets, whilst the draft Policy only contains a target density (Appendix 1) which, effectively represents a minimum/baseline density rather than an actual desired density target. Given the Government's infill agenda and to support the SPP 'Policy Outcome' of ensuring the *'density and diversity of housing in and around activity centres is maximised'* UDIA suggests that the density targets should be redefined as minimum density targets as per the existing SPP. Whilst this may be considered a relatively minor and trivial amendment, language and terminology used is becoming increasingly important to enable all community members to understand more accurately the planning policy framework and its development objectives. This amendment would be more consistent with district centres such as Scarborough and Canning Bridge which have capacity for and have successfully delivered density beyond the SPP's baseline. Similarly, UDIA queries whether the density targets in local and neighbourhood centres align with current best practice and ensure land is used efficiently.

Recommendation

- That the density targets are redefined as minimum density target, or alternatively are revised upwards to more accurately reflect the SPP's objectives and governments infill aspirations.

In closing, whilst UDIA is supportive of the policy and intent, we wish to reiterate that the lack of precinct structure plan should not prevent, delay, jeopardise or add undue uncertainty to development in activity centres. Should the Department require any assistance or further information regarding this submission UDIA WA would be delighted to assist, and invite you to please contact Christopher Green, Director Policy and Research, at cgreen@udiawa.com.au or 9215 3400.

Yours sincerely



Tanya Steinbeck
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