



**INTERIM SUBMISSION TO THE
WESTERN AUSTRALIA PLANNING COMMISSION**

DRAFT STATE PLANNING STRATEGY

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INTRODUCTION

The Western Australian Local Government Association (WALGA) is the united voice of Local Government in Western Australia. The Association is an independent, membership-based group representing and supporting the work and interests of all 140 Local Governments in Western Australia.

The Association provides an essential voice for 1,249 elected members and approximately 14,500 Local Government employees as well as over 2 million constituents of Local Governments in Western Australia. The Association also provides professional advice and offers services that provide financial benefits to the Local Governments and the communities they serve.

The comments contained in this submission have not yet been considered or endorsed by WALGA's State Council, as such, please be advised that this is an interim submission and that the Association reserves the right to modify or withdraw the comments as directed by State Council.

COMMENT AND RECOMMENDATIONS

During the public comment period for the draft State Planning Strategy (SPS), the Association sought comment from the Local Government sector to inform a representative submission to the Western Australia Planning Commission.

This submission reflects the main issues and concerns raised by the Association and Local Government in relation to the draft Strategy.

GENERAL COMMENTS AND RECOMMENDATIONS

The Association welcomes the release of the draft State Planning Strategy and the intention of achieving a 'sustained prosperity' for Western Australia. It is clear that considerable effort has gone into the development of the Strategy which is comprehensive in examining a range of issues associated with the State's development. The document provides a good snapshot of the current issues and challenges faced by Western Australia. Notwithstanding this, the Association is concerned that in its current form, the Strategy is unclear as to how its aim for 'sustained prosperity' will be achieved. Furthermore, without specific targets, measuring the success of the SPS will be difficult. The Association's concerns and recommendations in relation to these concerns are set out below.

Strategy Structure

The structure of the Strategy is confusing. It includes a vision, principles, strategic goals and ten strategic directions, each of which is further divided into an objective, overview, key facts, approach and challenges. There are considerable overlaps between each of the Strategy's sections which do not necessarily flow on from broad objectives and into more detailed, outcome focused goals. It is also not clear which, if any, of the strategic directions are a priority or not. It is also unusual that the document's vision follows its principles, although the Strategy's structure as shown by Figure 1, suggests otherwise.

It was notable that the Development Assessment Forum (DAF), Good Strategic Planning Guide, 2001, suggested that the 1997 State Planning Strategy contained "*too many recommendations and actions. There is a need to focus more clearly on those aspects that require specific attention, rather than merely recording on-going programmes*". In contrast to the DAF guidance, the draft SPS has introduced a greater level of complexity to the structure of the document that did not previously exist. As such, the focus and priorities of the draft SPS are more obscure. Further, the current SPS was supported by discussion papers to

justify the preparation of the strategy and provide a basis for the approach of the Strategy. It would have been beneficial to provide a similar analysis of the issues/topics to assist in the understanding of the newly drafted SPS.

Recommendation:

1. The Association recommends that the structure of the Strategy be improved so that the Strategy's priorities and objectives, together with the mechanisms for delivering these objectives are clear.
2. A section or details be added, explaining 'how to use the document' to enable all agencies using the document to clearly understand how to apply the SPS given their role in the planning process.

Clarity and Implementation

The Association is concerned that the draft State Planning Strategy fails to provide a clear definition of the land use priorities for the State. The SPS should set out a clear long-term or overall aim for the State and a plan of action designed to achieve this aim. In contrast, although the SPS is very good at analysing the issues and challenges facing the State, it does not provide a strategy for overcoming these challenges. With this regard, the lack of guidance offered by the Strategy is such that it fails to fully satisfy the requirements of the Planning and Development Act; which is;

“to prepare and keep under review (i) a planning strategy for the State as a basis for coordinating and promoting land use planning, transport planning and land development in a sustainable manner, and for the guidance of public authorities and local governments on those matters.”

It is particularly important to note that the purpose of the Strategy is to provide guidance to public authorities and Local Government. However without clearly defined strategic targets, it is difficult to contend how subordinate policy documents, such as regional and local planning schemes will be guided by the Strategy. On this basis, it is also difficult to understand how the compliance of emerging sub-strategies will be tested against the intentions of the SPS. Furthermore, whilst the Strategy seeks to move beyond land-use planning, it is not clear what the land use planning responses to these issues are.

The manner in which the 'strategic directions' are intended to be addressed are set in the series of 'approach tables'. The 'aspirations' within these tables are generally broad statements that whilst well intended, do not provide a strategic direction for coordination of land use planning for the guidance of public authorities.

The 'measurements' set out in the 'approach tables' are in the main, not planning focused, as such the relevance of these measurements is not clear, as is the responsibility the implementation and performance monitoring of these measurements. Furthermore, the 'measurements' do not outline specific indicators and targets that cannot be accurately monitored. This should be addressed.

Although governance is listed as one of the six principles of the SPS, no governance framework is outlined by the document or any reference to how the SPS will be funded. It is therefore difficult to understand how the SPS might be implemented. This is critical given the fact that the SPS has moved beyond land use planning and its implementation is reliant on multiple agencies.

For there to be a clear understanding of intended implementation, the State Planning Strategy should identify the responsibility, mechanism and timing details for each of 'aspiration'.

Recommendation

3. The land use planning and associated responses to the issues and challenges identified by the SPS are clearly set out in a governance/implementation framework. This framework should include a detailed outline of how and when these responses will be implemented and who this responsibility shall reside with.

Population Growth

The Strategy offers little guidance and advice concerning the State's population growth, despite the fact that this will have considerable implications for the management of development within WA. The Strategy does not set out clear targets for the State's population growth, or the areas and regions within which this growth should occur. For example, whilst the Strategy predicts that the Perth and Peel regions will be the focus for majority of the State's population growth, it is not clear if this growth is an intended aspiration or simply a forecast.

As the population of WA and its regions grow, issues such as providing employment opportunities, transport, waste management, together with land availability and affordability will become increasingly critical. The Association recommends that in accordance with the requirements of the Planning and Development Act, the Strategy offers guidance for public authorities in addressing these issues.

Recommendation

4. The Association strongly recommends that the Strategy identifies population growth targets for each of the State's regions, together with strategies for the managing population growth and associated issues such as employment, transport, waste, land availability and infrastructure.

Consultation

There has been no consultation undertaken in the formulation of the SPS with the community or the Local Government sector, the latter of which is responsible for a large part of the implementation of the Strategy through their local planning schemes and planning policies. The 'Executive Summary' document attached to the SPS states that "*Public Comment is the final phase in the content development of the State Planning Strategy*". The fact that the community's aspirations and vision for Western Australia were not been captured at the outset in the development of the SPS is concerning. It is notable that by comparison, Local Government is required to consult the community prior to the development of goals and priorities for Strategic Community Plans.

Recommendation

5. That the SPS is amended in accordance with the feedback received during this consultation period and a further consultation held prior to the final release of the Strategy.
6. All future revisions to the SPS include appropriate public consultation at the outset of the revision process to ensure that the aims and visions for the Strategy properly represent those of the Western Australian community.

Infrastructure Provision

The document breaks infrastructure provision down into movement, water, energy, waste and telecommunications; however there is no indication of infrastructure priorities, even in a general sense. Uncertainty surrounding State Government funded infrastructure provision has been a common impediment for the Local Government sector as well as others; yet the draft State Planning Strategy does nothing to address this issue.

Recommendation

7. That the SPS sets out the regional infrastructure priorities and identifies responsible agencies

SPECIFIC COMMENTS AND RECOMMENDATIONS

Western Australia 1850-2050

It is not clear whether the data and charts shown in the sections regarding 'water sources' and 'climate and environment' relate to the whole of Western Australia or certain a region(s). It is also not clear whether the 'water sources' information relates to water supply, demand or potential sources. Likewise, it is not clear whether the information regarding 'energy' relates to supply, demand, or output/exportation. It is also interesting that the historical timeline includes 1990 political appointments but does not include a reference to the 2005 Planning and Development Act or the Metropolitan Redevelopment Authority Act 2011. In the context of the SPS these are important milestones.

Recommendation:

8. That the SPS clarifies the information set out by the charts and figures shown in the section Western Australia 1820-2050.
9. The type error is corrected to 'Trans-Australian Railway'.
10. That the historical timeline references the 2005 Planning and Development Act and the Metropolitan Redevelopment Authority Act 2011.

The State Planning Strategy in context

It is stated that the SPS *"links to and builds upon other strategic planning positions put in place by the WAPC"*. This is misleading. The SPS should not build upon these other strategies, rather as the leading strategic planning document for the State; the other documents should be informed by the SPS.

Recommendation:

11. That the SPS clarifies its relationship with other planning documents.

Drivers of Change

Recommendation:

12. The type error contained in the first paragraph is amended to 'GDP'.

Figure 5 Projected Population Growth

Figure 5 sets out a series of population projects based on assumptions of high growth, current trends and low growth. However, the Association is concerned that the SPS does not provide clear guidance as to which, if any, of the population growth projections the Strategy is pursuing. This is a critically important issue. Population projections should underpin the strategic planning response set out by the SPS.

The text accompanying Figure 5 states that WA's population is expected to at least reach 3.5million. However the low growth projection set out by Figure 5 appears to show a figure much less than 3.5million.

Recommendation:

13. That the SPS clarifies which, if any, of the population growth forecasts the Strategy is pursuing.
14. That the SPS clarifies what the State's population minimum growth forecast is expected to be.

Climate Change

The Strategy notes that climate change will result in the change in the location and productivity of arable land and water availability. However the impacts of climate change will not only be restricted to arable land, it will have an impact upon all land. It may affect all agricultural land and agricultural activities and lead to implications for associated industries and communities.

Given that agricultural resources form a key element of the SPS's aim of 'sustained prosperity', the effects of changing environmental conditions raises a number of pertinent questions including; have the new/changing agricultural areas been identified and if so, does this land need to be appropriately protected through the planning process? How will the impact of agricultural industry changes on communities and infrastructure be managed by the planning system; and finally, how will other industries and communities vulnerable to climate change be managed? This SPS does not provide clarity on these issues.

Recommendation:

15. That the Strategy clarifies the planning response to the change in the location and productivity of all agricultural land.
16. That the Strategy clarifies how the planning process will assist communities and industries vulnerable to effects of climate change.

Figure 11 Climate Change Scenarios

Figure 11 shows that the impact of 'medium emissions' on winter rainfall is greater than the scenario for 'high emissions' in the year 2030. The Association seeks clarification that this is correct.

Recommendation:

17. That the SPS clarifies the impact of emissions on winter rainfall for the year 2030.

The Principles

The SPS notes that it is "*imperative that the devolution of planning and development powers are effective and appropriate to achieving 'on the ground' and timely decisions' "*". This statement is given without context and is confusing. Recent amendments to the planning approval process and the adoption of Development Assessment Panels, has resulted in the centralisation of development powers, not the devolution of these powers.

Recommendation:

18. That the SPS clarifies the statement "*devolution of planning and development powers*" and how and when these powers will be devolved.

The Vision

A diverse State:

The SPS states that *“in 2050, the diversity of Western Australia’s natural resources and unique landscapes, ecosystems, peoples, enterprises and cultural landscapes will be celebrated, protected and recognised”*. The Association questions why this cannot be achieved before 2050.

Recommendation:

19. That the SPS’s vision for WA’s natural resources is clarified.

Planning for sustained prosperity

It is stated that by 2050 WA will have a diverse range of vibrant local communities that are resilient, active multicultural and respectful to difference. Nevertheless, this vision and the Strategy as a whole, fails to promote the development of safe or secure communities that are not unduly at risk from the threat of natural hazards such as flooding or bushfires. The threat posed by natural hazards is already a significant challenge for the State, which with climate change is likely to further increase. However, responding to these issues through land use planning is widely considered to be the most cost-effect mitigation approach.

Recommendation:

20. That the statement is expanded to promote the development of secure communities that are appropriately protected from natural hazards.

Prosperity for future generations

The Strategy proclaims that WA *“will be shaped by globalisation, population growth, technology and access to water and energy”*. Whilst these factors will certainly play a role in the shaping the State, other factors such as the environment and community values and attitudes will play an equally important, if not greater role.

The Strategy states that the document will be used by the Western Australian community to help shape and understand the long term vision for the State. This approach is flawed. The case should be that the Strategy is informed by and responds to the community’s vision for the State, rather than the community being informed of a vision for the State by the document.

Recommendation:

21. The Strategy recognises the full range of factors that will affect the growth of WA.
22. That the SPS clarifies the relationship between the document and the Western Australian community and how the State will evolve with time.

Strategic Goals

Conservation

There is a danger that without proper controls, the streamlining of the project approval decision process, as discussed by the Strategy, may jeopardise the ‘conservation’ strategic goal.

Recommendation:

23. That it is made clear how streamlining the project approval decision process will operate and how/why this does not conflict with the protection of the environment.

The Spatial Dimensions

Figure 14

The Strategy fails to explain what the 'economic activity areas' and 'infrastructure bands' shown by Figure 14 are. Furthermore, even though it is not clear what these 'infrastructure bands' are, it is evident that there are a series of gaps between their spatial connectivity. Notable gaps include the triangle between Port Headland, Karratha and Newman, and Leonora through Kalgoorlie to Esperance. It is also questioned why the South West, given its high level of economic output, is not seen as 'economic activity area', particularly the area around Manjimup which is identified as a 'Supertown'.

Figure 14 also identifies a series of 'regional centres' and 'sub-regional centres' but fails explain the significance of these designations and set out a strategy managing their development.

Recommendation:

24. That the SPS clarifies what 'economic activity areas' and 'infrastructure bands' are and sets out the strategic land use planning response for these areas.
25. That the inconsistencies shown by Figure 14, in the location of 'economic activity areas' and 'infrastructure bands' are corrected and made consistent with SPS definition of these areas.
26. The SPS provides details of the strategic land use planning response concerning the management of the State's regional and sub-regional centres.

Central sector

The Strategy states that the Gascoyne Revitalisation Plan is a five year project; however the Department of Regional Development and Lands claim that this is a six year project.

Recommendation:

27. That period for which the Gascoyne Revitalisation Plan will operate is made clear.

South West sector

The Strategy states that the South West sector will be home to least three-quarters of the State's overall population. However, it is stated on page 12 that Perth is expected to be become the home of 75% of the State's population. Should the latter be true; then the population of the whole of South West sector which includes Bunbury, Mandurah, Albany as well as Perth Metropolitan Region will have a much larger percentage of the State population than is stated. Furthermore, the Strategy is not clear if these population projections are desirable outcomes or not.

The Lower Great Southern Strategy is omitted from the list in the regional strategies and Figure 17 South West Sector, incorrectly shows the location of Mandurah as being within the Perth Metropolitan Region.

Recommendation:

28. That desired population targets for the South West sector and all other regions are given together accurate population forecasts.
29. That the Lower Great Southern Strategy is included in the list in the regional strategies.
30. The regional boundaries shown in Figure 17 are corrected.

Shaping WA to 2050 and beyond

The Strategy proclaims that the strategic directions for the State have been identified in accordance with research and collaboration across the State. No reference or explanation of this research is given to this research other than a long list of reference documents at the end of the Strategy.

Recommendation:

31. The SPS provides a clear justification of the reasoning for the State's strategic directions.
32. The type error in Table 1, Overview "*State's sustained prosperity*" be amended.

Economic Development

The Strategy states that "*global competitiveness in the future will be largely defined in terms of competition for talent*" and that "*innovation will drive productivity growth*". However, it is not clear how these statements translate into actions and outcomes set out within the approach table and who will take responsibility for meeting such challenges.

Table 2, a Strategic Approach to Economic Development, seeks to encourage industrial and economic clusters, however fails to identify specific sectors and industries that are encouraged to cluster.

It is noted that references to entrepreneurial activity, start-up enterprises and micro-home-based activity are very limited within the SPS. Given the strong opportunities these activities provide in growing new businesses, such aspirations should be supported by the SPS as mechanisms for generating new wealth within the State.

There is no reference within the SPS concerning the growing trend of remote working/telecommuting and the consideration of supporting activities that reduce the need to travel for work related purposes. The emergence of this trend should be captured by the Strategy. Similarly, the SPS contains limited reference to opportunities for growth within the digital economy.

Recommendation:

33. The SPS provides a strategy for using innovation to drive productivity growth.
34. The Strategy identifies specific employment sectors which are encouraged to form economic activity clusters.
35. The Strategy provides guidance concerning the creation of new start up enterprises and micro-home based economic activities.
36. The SPS offers guidance concerning remote working / teleworking.
37. The SPS sets out guidance concerning the growth of the State's digital economy.

Education, training and knowledge transfer

It is not clear how this section relates to the requirements of the Planning and Development Act which states the purpose of the strategy is to provide the basis for "*co-ordinating and promoting land use planning and land development in a sustainable manner*".

The items discussed within this section are far removed from 'planning'. As such, it is not clear how these issues relate to planning, what the planning response is to these issues and how the response will achieve the aspirations set out in Table 3. In addition, as the measurements set out in Table 3 are not 'planning' performance measurements, it is not clear who will undertake this monitoring.

The Aspiration to ‘increase innovation enterprise and a net gain in creative capital’ would be better placed within the ‘Economic Development’ objective given its greater synergy with business creation and growth.

Recommendation:

38. The relationship between ‘education, training and knowledge transfer’ and planning should be clearly explained.
39. The planning system response in seeking to achieve the ‘education, training and knowledge transfer’ aspirations should be identified.
40. The process and delivery responsibility together with the responsibility measuring the performance is explained.
41. That references to ‘creativity and innovation’ set out in table 3 are relocated within the ‘Economic Development’ section of the SPS.

Tourism

Figure 19, Planning for tourism does not provide reference to some of the Great Southern Region’s primary tourist attractions which include beaches and the Stirling and Porongurup Ranges.

The SPS does not reference the *State Government Strategy for Tourism in Western Australia 2020*, which outlines a goal of doubling the value of tourism to \$12 billion a year by 2020. The alignment between the Strategy and other key documents such as this should be incorporated within the ‘Approach’ tables.

Recommendation:

42. That the box to the south of Esperance in Figure 19 provides reference to ‘beaches’ and the Stirling and Porongurup Ranges.
43. That the SPS is aligned with the State Government Strategy for Tourism in Western Australia, 2020.

Environment

Figure 20 fails to provide explanation as to what ‘natural heritage’ areas are or represent. The shaded areas on the map only partly correspond to the National Heritage Sites listed on the Australian Government website or to the DEC managed National Parks. The Marmion Marine Park and the Shoalwater Island Marine Park are not marked on the map. Nationally recognised Wild River Catchments (Department of Water, 2008) should also be included.

The objective for the environment assumes that the State wants biodiversity to remain at the current level. Instead the objective should include a statement which seeks to improve the current status of biodiversity.

Although the Strategy briefly lists some of the benefits of conserving biodiversity, it does not recognise the other important roles that ecosystem play including, cultural services (spiritual, recreation, knowledge) supporting (habitat provision, primary production, nutrient cycling, oxygen production, soil formation and retention, regulating services (pollination, seed dispersal, climate regulation, water purification). Biodiversity is fundamental to our physical, mental, social, cultural and economic wellbeing and should be recognised by the Strategy.

The document states that it “*seeks to support current development assessment practices so that environmental issues are considered in a timely, integrated and holistic way*”. However, current development assessment practices are widely regarded as being inadequate. In order to achieve positive biodiversity outcomes through land use planning, biodiversity conservation issues need to be integrated through all layers of the planning framework. In

most parts of WA, the availability of data to support assessment of biodiversity values is inadequate. Currently, assessments of vegetation types, threatened flora, fauna and ecological communities are undertaken too late in the planning process and do not allow for adequate consideration of regional and local conservation needs. In addition, the current planning framework does not adequately facilitate retention and maintenance of ecological connectivity in urbanising landscapes.

The environment overview states that WA comprises of “*ten climatic zones from the wet tropical North, inland deserts, a temperate South West and global biodiversity hotspots*”. This sentence is confusing as global biodiversity hotspots are not climatic zones.

The Strategy states that “*Western Australia has a high ecological footprint and high levels of waste generation, which suggests we need to improve*”. Rather than simply suggest, this statement clearly indicates that improvement in the use of the States resources and waste management practices are needed.

The Strategy highlights a series of impacts arising from climate change. This passage should also highlight changes in agricultural patterns as this will also require the State to modify and adapt the way land is managed. The Strategy goes on to say that the State’s development and consumption should be planned in a prudent way. It is not clear what prudent means in this context.

A number of the aspirations set out in Table 5 are ambiguous and do not provide a clear direction. For instances it is not clear what the aspirations ‘special controls for areas affected by climate change’, ‘vulnerable areas are secured and managed’ or ‘WA is a major contributor to a clean energy future’ mean or how land-use planning and associated systems and process should respond to these challenges.

Recommendation:

44. That the Strategy clarifies ‘natural heritage’ areas as shown by Figure 20 and gives recognition to the State’s National and Marine Parks as well as the wild river catchment areas.
45. The objective for biodiversity is amended to seek the improvement of the State’s current biodiversity status, not only conserve it.
46. As the leading strategic planning document for the State, the Strategy should seek enhancements to the existing planning to facilitate adequate biodiversity data collection to support strategic land use planning at the regional and local levels; and seek to facilitate the establishment of ecological linkages through landscapes, including urban areas.
47. That the Strategy is clear in providing details of its landscapes and environmental assets.
48. That the Strategy is unequivocal about the need use the State’s resources more efficiently in the pursuit of ‘sustained prosperity’.
49. That Strategy outlines how changing agricultural patterns resulting from climate change will be managed.
50. That the Strategy clarifies how development and consumption can be ‘prudently’ planned and managed. Alternatively the text should be amended to state that development will be planned ‘in accordance with precautionary principles’ and outline what this means.
51. That the Strategy includes, clear, tangible aspirations such as providing ecological and habitat linkages. The ‘Aspiration’ which states that “*Natural resources such as water, agricultural land, and basic raw materials are conserved for future use and development*” should be expanded to include ecological factors and revised to state ‘conserved for ‘sustainable’ future use’.

Agricultural and Food

In addition to the challenges listed in the 'overview' section, it is also important to note that the State's agricultural and other food supply systems are extremely susceptible to the availability of water.

The Strategy states that demand for food production will increase "*making the protection of existing and potential food production areas essential*". Despite this statement, the Strategy fails to go further and explain how the planning process will respond to this challenge or to recognise this issue within the 'approach' section.

The Strategy refers to the monitoring of a number of food supply elements, however fails to explain how this will be undertaken and its implications for planning. Furthermore, food, wines and horticultural stocks are also important export products for Western Australia and should be recognised by the Strategy.

The 'agriculture and food' section does not mention the fact that large areas of agricultural land are being purchased by overseas investment companies with the objective of exporting produce to their home countries. This raises the question of food security for the State, particularly for the long-term, as the State's population grows. In addition, little mention is made of the horticulture industry despite the fact that the industry is an important one to WA accounting for 20% of the national output.

Table 6 refers to the fragmentation of agricultural land as being negative; however this is a dated and flawed concept. The aspiration should be 'to encourage the most effective use of land'. The additional capital resources required to service large landholdings has resulted in the failure of a number of large operations in recent years. In addition, Table 6 refers to 'global competitiveness' however the main content of this element is food production.

Recommendation:

52. That reference is given to the availability of water for maintaining agricultural output.
53. The Strategy sets out the strategic planning mechanism(s) for recognising and protecting existing and future potential agricultural lands.
54. Further details of the food monitoring process are provided and recognition is also afforded to food, wine and horticultural products.
55. Reference is given to impact of the loss of large agricultural holdings to overseas investors and that the Strategy outlines measures for ensuring the State's long-term food security.
56. The strategy provides appropriate recognition to the horticulture industry.
57. The aspiration seeking to avoid fragmentation and encourage consolidation of agricultural land holdings is revised to encourage the most effective and efficient use of land.
58. 'Global competitiveness' in Table 6 is amended to 'food production'.

Physical Infrastructure

Gas is omitted as an element of physical infrastructure.

Figure 23 highlights a number of planned intermodal freight terminals, but does not include reference to the intermodal terminal planned for Kalgoorlie-Boulder. This is despite the fact that this facility is listed in a range of strategic planning documents.

The key facts section states that 11% of entrepreneurs in 14 OECD countries noted that inadequate infrastructure was major impediment. This low percentage does not support the argument put forward that physical infrastructure is an important priority for Western

Australia. Furthermore, given the sheer size of WA and the nature of its settlement patterns comparisons between the State and 14 OECD countries are unreliable. Furthermore, this fact is not referenced and it is somewhat dated.

The reference made to the 2003 Generating Growth: Infrastructure report is dated.

Recommendation:

59. Reference is given to the supply of gas as physical infrastructure.
60. Figure 23 identifies the Kalgoorlie-Boulder intermodal freight terminal.
61. Relevant, accurate and up-to-date facts should be used to describe the issues and challenges concerning the various topics contained in the Strategy.

Movement of people, resources and information

The fourth key fact point refers to the movement of freight throughout 'the city', without clarifying which 'city' this is.

Table 7 A Strategic approach to movement

The relevance of road pricing reform to planning is ambiguous and therefore its inclusion in the State Planning Strategy queried. Nevertheless, the aspiration is to set a price for the use of state roads that is reflective of the social and environmental costs is justified. It is however, unclear whether the intention is to apply road pricing to all roads or not just State governed roads given that over 90% of all roads are managed by Local Government. Furthermore if road pricing is introduced, what alternatives forms of transport will be provided to cater for the modal shift brought about by road pricing?

Table 7 seeks to promote a modal shift, encouraging people to use public transport, walk or cycle as alternative method of transport. However, promotion of a modal shift should not be limited to the movement of people it should also apply to the movement of freight and goods.

Recommendation:

62. The Strategy is clear in its references to geographical locations.
63. The Strategy makes it clear whether the introduction of road pricing would apply to all roads.
64. That the pursuit of a modal shift is not restricted to people movement, where possible the movement of freight and goods should be made by means other than road.

Water

Table 8 A Strategic approach to water planning

It is difficult to understand how the measurements and aspirations set out in Table 8 relate to planning. The table should set out the planning response to ensuring a secure and safe water supply. For instance, this may include encouraging appropriate industries and large users of water to locate close together to maximise the potential and viability of waste water treatment and use opportunities?

Whilst there is a clear intent by the Strategy to ensure that water provision supports economic and population growth, the provision of wastewater treatment infrastructure is not given the same attention. Given the recent constraints placed on land development as a result of the delays to the commissioning wastewater treatment plants, the need to coordinate wastewater treatment services to support economic and population growth should also be addressed.

The SPS appears to promote the use of groundwater for commercial and domestic use, whilst failing to highlight the importance of groundwater to dependent ecosystems.

Recommendation:

65. That the SPS makes clear the planning response to securing the availability of a reliable, adequate and safe water supply.
66. The need to coordinate wastewater treatment services to support economic and population growth should also be articulated and prioritised.
67. That the SPS highlights the importance of groundwater as a resource that is relied upon by dependent ecosystems.

Energy

Figure 25 should refer to the Bunbury to Albany gas pipeline and its route should be referred to by Table 9.

The facts and figures given in the key facts section provide a comparison of the State as a whole against the rest of Australia. However, given the population and settlement disparities between WA and the rest of Australia, 'per capita' figures for energy use would be more useful and provide a better comparison.

Whilst the references to securing reliable clean energy in order to meet the State's growing energy demands are supported, the SPS provides little advice as to how this can be achieved and which agencies are responsible for managing the State's energy issues that are highlighted.

Recommendation:

68. That the Strategy provides reference to the Bunbury to Albany gas pipeline.
69. That the facts and figures given in relation to the amount of energy used by the State are amended to 'per capita' to allow for a more accurate comparison of the State's energy usage.
70. That the SPS highlights the agencies responsible for managing the State's energy issues

Waste

The overview states that "*there is a presumption against siting putrescible landfills on the coastal plain or other environmentally sensitive areas*". These areas should be referenced by Figure 27. A visual representation of these areas will assist decision makers in ensuring all Western Australians have access to the required services and infrastructure. It would also be useful if the Strategy provided definitions for material recovery facilities and resource recovery facilities, as well as a description of the various technology types.

There is a need for immediate action and targets in the State Planning Strategy, in order to achieve an integrated waste management system in the next 10 years. There is a risk that using long term planning objectives, will result in a reduced sense of urgency and delayed action.

The key facts section proclaims that the waste industry will be challenged by future carbon constraints as a result of the Commonwealth Governments carbon pricing mechanism, but does not explain how. Whilst it is accepted that the management of some waste products will be challenged by the carbon pricing mechanism, the viability of other aspects of the industry may increase.

Recommendation:

71. That Figure 27 references the coastal plain and other sensitive areas, unsuitable for putrescible landfills.
72. Definitions of material recovery facilities and resource recovery facilities should be provided.
73. Include immediate targets for action to achieve an integrated waste management system within the next 10 years.
74. That the 'key facts' section provides information based facts only.

Social Infrastructure

It is not clear what is meant by the statement, '*although there are multiple causes for social issues, prevention through collaborative planning and infrastructure delivery is the best way to manage these issues*'. More detail is needed to explain how collaborative planning and infrastructure delivery can resolve social exclusion and obesity.

The 'key facts' section repeats the point that people who live in walkable neighbourhoods are more likely to walk at least 60 minutes per week. This fact goes onto claim that this endorses a shift away from low density suburban developments. The issue of 'density' should be clarified. Low density itself is not the issue; the issue here is often the lack of access to, or the poor quality of open spaces, services and public transport, rather than simply a low housing density.

Recommendation:

75. That the duplicated 'facts' are removed from the social infrastructure section.
76. The key facts should be careful not to include notions as facts.
77. That the type error 'transit.gap' be corrected.

Spaces and places

The State's strategic approach to planning spaces and places will become an increasing issue as population and housing densities increase. Such changes can significantly alter the character of an area. Therefore, it would be useful if the SPS set out greater guidance on the provision of additional facilities and public open spaces in areas affected by increasing housing densities.

The key facts set out in this section concern transport rather than 'spaces and places'.

Recommendation:

78. Incorporate an aspiration within the spaces and places objective to provide additional facilities and public open space areas in locations affected by increased housing density.
79. More appropriate key facts are used within 'spaces and places' strategic direction.

Affordable living

The Premier, in his foreword, declares that the Strategy "*takes a broad integrated view of planning and development in this State, reaching beyond land use planning to place priority on managing population and economic growth*". Nevertheless the section on Affordable Living is largely silent on how mechanisms other than those available through land use planning can be used to increase the availability of affordable homes.

There is a strong case for broad reform to address the fundamental drivers of the housing market, not just planning. Whilst many reform measures should be linked to the orderly

supply of land for development, reforms which allow new homebuyers to more readily enter the market should be encouraged.

In terms of land supply, approaches could include flexibility with the payment of servicing infrastructure charges from developers; incentive based rating arrangements, as well as greater efficiency within the development approvals processes.

Incentives for new homebuyers could include taxation reform (Stamp Duty reforms etc), reduced fees and increased access to credit.

The overview refers to the State's Pilbara Cities program as an initiative that is seeking to reduce the cost of living within the region. Nevertheless the Strategy fails to highlight other initiatives elsewhere within the State, or highlight the lack of such initiatives elsewhere as a priority which should be addressed.

Recommendation:

80. The aspirations set out within the 'Affordable Living Strategic Direction', more than any other, should look to go beyond planning interventions and examine more broadly all the factors affecting housing and land affordability.
81. The Strategy should explain what initiatives and strategies are in place or proposed to increase the supply of affordable housing across the State, not only the Pilbara.

Health and Wellbeing

Members of the community with specific or special needs are not adequately addressed by the draft SPS. The Strategy does not provide direction to accommodating seniors or indeed any other persons with special needs requirements. This is despite all projections suggesting that it the State's age profile is increasing and managing this will be a significant challenge for the State.

Furthermore, the area of alcohol management has not been mentioned and should be captured in the 'Health and Wellbeing' Strategic Direction.

The Strategy states that the built environment has a significant impact upon physical activity and mental health but does not explain how and why this is the case. The objective goes on to declare that opportunities for active and passive recreation should be integrated into new development. However there is no mention of providing adequate open space or the encouragement of active and passive recreation opportunities within the 'approach' set out by Table 14.

Recommendation:

82. The SPS should put in place direct 'aspirations' that bring about positive change in the provision of aged person's accommodation and access to facilities/activities, along with methods of achieving these 'aspirations'.
83. The Strategy sets out the State's strategic planning response to alcohol management.
84. The Strategy clarifies the impact of the built environment upon health and wellbeing and the land-use planning response to this issue.

Land availability

Figure 32 shows a green shaded area around Kununurra that is not included on the key. As such, it is not clear if this area is intended for 'new agri-food industries' or for another use.

Table 15 sets out an aspiration for controlling population growth through pre-defined precincts, but fails to provide further clarity concerning how 'urban growth boundaries and zoning limits' will be implemented or the locations in which these instruments will be applied.

Table 15 refers to the fragmentation of land as negative, which is not always the case. The aspiration should be more appropriately worded so that the aspiration is to encourage the most effective use of agricultural land for food production. Providing agricultural holdings consist of good quality land and water supply then large agricultural holdings are not necessarily needed. The creation of large land holdings increases the amount of capital and resources required for purchasing and servicing the land which is increasing difficult to access. In recent years, many large operators have failed as a result of becoming so large that diseconomies of scale have taken affect.

Recommendation:

85. The green shaded area around Kununurra shown by Figure 32 that is not included on the key is corrected.
86. The SPS provides greater clarity on the implementation of 'urban growth boundaries and zoning limits'.
87. That the 'aspiration' concerning the fragmentation of agricultural land is clarified.

Remote Settlements

The reasoning and use for the declaration of 'remote regions' is not clear. Furthermore, the relationship between remote regions and remote settlements is also not clear. Are remote settlements only defined as settlements within a remote region? Or alternative can a settlement be classed as being remote, even though the region that it is within is not in itself remote?

It is notable that the majority of the measurements included in the approach, Table 16 are not planning focussed. Furthermore, the significance of these measures is not explained. Simply stating the 'number of' is sufficient to explain whether an increase or decrease is sought and evaluate progress. As such, the relevance of the measurements set out in Table 16 is questioned together with the monitoring process.

The paragraph "*Local Governments will need to become increasingly involved in providing services and infrastructure in remote settlements*" fails to recognise the on-going discussions between the Federal, State and Local Government sectors as to how this could occur. The use of 'will' implies that agreements have been reached, which is not the case.

Recommendation:

88. That the Strategy clarifies the rationale for the declaration of remote settlements and remote regions.
89. That the SPS clarifies the planning goals and objectives for remote settlements.
90. That the Strategy clarifies what the performance measurement process will monitor and how this will be achieved.
91. That the statement "*Local Governments will need to become increasingly involved in providing services and infrastructure in remote settlements*" is corrected.

Planning for Security

The paragraphs discussing the State challenges for planning for security are an exact repeat of the challenges listed for remote settlements.

Recommendation:

92. That the Strategy corrects the planning for security, State challenges.

CONCLUSION

In conclusion, whilst welcoming the release of the draft State Planning Strategy, the Association is concerned that;

- The structure of the Strategy is overly complicated and should be simplified.
- State Planning Strategy fails to provide a clear definition of the land use priorities for the State.
- The Strategy does not set out clear targets for the State's population growth, or the areas and regions within which growth should occur.
- Many of the aspirations and targets within the Strategy are not planning focused and the Strategy is not clear how these aspirations can be achieved and who the responsibility for undertaking such actions resides with.

The Association recommends that the comments and recommendations outlined in this submission are considered in the finalisation of the State Planning Strategy. In addition, the Association kindly requests that it and its members be kept informed of the progress made in the preparation of the Strategy and that further consultation is undertaken prior to its adoption.