

21 April 2016

Draft *Perth and Peel Green Growth Plan for 3.5 million*
Department of the Premier and Cabinet
Locked Bag 3001
WEST PERTH WA 6872

Dear Sir/Madam,

Draft Perth and Peel Green Growth Plan for 3.5 million submission

As you may know, the Committee for Perth, as the leading think tank on Perth's liveability aims to lead debate, advise and be a catalyst for positive change in all areas affecting the growth and development of Perth. We do this by taking an evidence based and solutions focused approach to examining and advocating for action to reshape, reform and revitalise the Perth and Peel region.

This submission has been prepared by the Committee for Perth with assistance from members of our Reshaping Working Group. It has been informed by a presentation to the Committee's Reshaping Working Group from the Department of Premier and Cabinet and attended by the Hon. Albert Jacob MLA, Minister for Environment and Heritage. We thank the Minister and the Department for the opportunity to meet and discuss the plan.

The draft *Perth and Peel Green Growth Plan for 3.5 million* proposes essential conservation strategies that the Committee believes will work to enhance the environmental values contained within the Perth and Peel region. We congratulate the Department of the Premier and Cabinet and all those involved for producing a comprehensive plan that delivers essential environmental and conservation outcomes whilst accommodating for future development requirements.

Attached is our detailed feedback in response to the draft *Perth and Peel Green Growth Plan for 3.5 million*. Should you require any additional information or clarification of the issues identified, please do not hesitate to contact me.

Yours sincerely,



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Comments - draft *Perth and Peel Green Growth Plan for 3.5 million*

The comments provided below are in response to specific concerns or provide feedback in regard to certain sections of the draft *Perth and Peel Green Growth Plan for 3.5 million* (Green Growth Plan).

General comments relating to multiple sections of Green Growth Plan

Overall the Committee for Perth agrees with and supports the Green Growth Plan and its associated Action Plans. As the region's population continues to grow there is a need to ensure that both conservation outcomes and development needs are accommodated in a way that will ensure the region remains highly liveable, prosperous and contains unique environmental values.

However our strong preference would be for the Green Growth Plan, the draft Perth and Peel@3.5million documents and the yet to be released Transport Strategy/Plan to be integrated into a single strategy and supported by an integrated suite of documents in order to holistically guide the future growth of the Perth and Peel region.

Our concern is that by producing separate strategies for land use; transport; and environmental protection there is potential for increased complexity, conflict and inconsistency between the strategies and objectives promoted within the strategic land use, environmental and transport plans.

The implementation of these plans should be directed by an overarching framework to guide decisions made by the Western Australian Planning Commission, the Government and others on the future growth and development of Perth and Peel. Setting accountable performance measures and criteria for major investment decisions is critical to achieve the necessary balance between outer suburban development and urban consolidation and infill.

In addition, it is imperative that the final Green Growth Plan is at least consistent with the final Perth and Peel @3.5million Strategy and future Transport Strategy and that the process for finalisation and future updates to these documents is integrated and occurs in unison.

The Committee notes outcomes of specific importance identified within the Green Growth Plan are:-

- a more efficient and sustainable urban form;
- reduced fragmentation of environmental values;
- additional 170,000ha of new parks and reserves;
- establishment of the Peel Regional Park;
- resolution of tenure, ownership and management of Bush Forever sites;
- protection of threatened species, wetlands and ecological communities;
- ensuring the long-term health of the Peel-Harvey and Swan Canning estuaries; and
- reducing delays from environmental approvals and related costs.

Each of these objectives are supported in principle.

Section 3.1.1 Urban

The Committee for Perth agrees that identifying areas suitable for future urban growth and simplifying processes for the protection of areas of environmental value are important to enable a more efficient and sustainable future for the Perth and Peel region.

However we are concerned that the Urban and Industrial Class of Action is focused on enabling greenfield urban expansion under a 'business as usual' growth scenario and therefore lacks a balanced approach with limited attention given to strategies and actions to improve and ensure the delivery of targets for urban infill and reduced land consumption.

The Green Growth Plan states that future growth will be focused on infill development (47%) within the existing 70,420 ha of urban zoned land, development of the 22,720 ha of undeveloped land zoned urban (36%) and development of 11,000 ha of urban expansion land in peri-urban areas on the fringes of the Perth and Peel geographical area (17%). This means that the urban footprint of Perth and Peel will increase by approximately 48%.

However it is clear that this level of greenfield urban expansion will not be necessary if the targets for urban infill and urban consolidation identified within Directions 2031 and the draft Perth and Peel@3.5million strategy are achieved.

The 2015 Urban Growth Monitor states that 'if Directions 2031 and Beyond targets for infill and dwelling density are achieved, the rate of land consumption would be roughly halved and existing stocks of land zoned for urban development could theoretically last for approximately 62 years' and 'accommodate a population of 3.8 million people' (p.54). It also indicates that current land consumption in Perth and Peel is approximately 920 hectares per annum (p. 54).

It is therefore evident that in assigning 33,720 hectares of land for future urban expansion the Green Growth Plan is providing for a business as usual growth scenario over the coming 35 year period rather than focusing on the delivery of Directions 2031 and Perth and Peel@3.5million infill and urban consolidation targets.

The Committee for Perth believes that all parts of State Government should be committed to and working towards the delivery of the targets identified within Directions 2031 and the draft Perth and Peel@3.5million strategies. We also believe that there could be potential to limit the environmental impacts of urban growth by taking action to reduce the region's future urban footprint.

In this regard, it is our view that the Green Growth Plan and related Perth and Peel @3.5million strategy should aim to strengthen the delivery of infill targets by limiting greenfield urban expansion to areas that are currently zoned for urban development i.e. not identifying additional areas for greenfield expansion.

Section 3.4 Infrastructure

Detailed planning for future infrastructure requirements in the Perth and Peel region is essential to delivering the aspirations of government. Therefore infrastructure must be integrated with planning for land use and environmental protection.

The Committee for Perth is concerned that much of the future infrastructure proposed within the Green Growth Plan in Figure 3 – 4 is not supported by substantial evidence based analysis and as a result may not be the most appropriate approach to provide for the future infrastructure needs of Perth residents.

It is therefore important that the DPC considers how the Green Growth Plan will be revised to remain up to date and consistent with current land use and infrastructure trends and analyses, strategies and projects. This should involve input from key government departments, local authorities and stakeholders to ensure that this is achieved.

The Committee for Perth strongly supports a fully integrated approach to planning for Perth and Peel and to achieve this we support planning for land use, infrastructure and environmental protection being undertaken in an integrated and coordinated manner.

Section 2.1.2 Key commitments – Protecting Carnaby’s Cockatoo

The Committee supports the proposed protection of Carnaby’s cockatoo however we query whether an overemphasis has been applied to the importance of protecting the Carnaby’s cockatoo in comparison to other species.

There are a number of species endemic to South West Western Australia that will be impacted by the Green Growth Plan, and we believe that these should be considered of equal value by the State. The specific referral to the cockatoo on 17 separate occasions far outranks any other species within the Green Growth Plan mentioned in Tables 4 – 3, 4 – 4 and 4 – 5.

The Committee therefore requests that a review is undertaken to ensure that the level of emphasis given to all species with habitat within the boundary of the Green Growth Plan is appropriate.

Summary

1. The Committee for Perth supports the Green Growth plan in principle and commends the Government on the work to date.
2. The Green Growth Plan needs to be fully integrated with land use and transport plans for Perth and Peel@ 3.5 million people. This should be supported by an overarching implementation framework that sets performance measures and criteria for major investment decisions to balance outer suburban development and urban consolidation.
3. The Green Growth Plan should aim to strengthen the delivery of infill targets by limiting greenfield urban expansion to areas that are currently zoned for urban development.
4. The Committee requests that a review is undertaken to ensure that the level of emphasis given to all species with habitat contained within the boundary of the Green Growth Plan is appropriate.