

MINUTES ATTACHMENT.

Ordinary Council Meeting

31 July 2018

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Our Ref:

3 July 2018

Planning Reform Team
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Dear Sir/Madam,

CITY OF SOUTH PERTH SUBMISSION – MODERNISING WESTERN AUSTRALIA’S PLANNING SYSTEM,
GREEN PAPER

The City of South Perth welcomes the opportunity to comment on the abovementioned discussion paper. The City is generally supportive of the reform principles and the five key reform proposals. Notwithstanding, high level comments on key issues and implications arising from the Green Paper recommendations and detailed comments on individual review proposals are provided below. Comments on further, meaningful engagement have also been provided in order to assist with the further development and implementation of the review proposals. **The below submission has been endorsed by the Council of the City of South Perth at its Ordinary Meeting held on 31 July 2018.**

1. Comments on key issues and implications arising from the Green Paper

The scope of the review proposals is broad and addresses multiple facets of the planning process and framework. To implement these changes will require significant resourcing at both the state and local government level and it is questionable as to whether both sectors have the capacity within current resources to deliver the changes in a timely and efficient manner. It is recognised that there is a need for capacity building within the current system. This should be approached holistically and a key consideration of the reform. Reform proposals should also be prioritised as short, medium and long term to provide a realistic framework for delivery. This will assist both sectors in ensuring there is adequate capacity within the available resources to deliver the reform proposals.

Further, the Western Australian planning system has been undergoing reform since 2009 and whilst some of the changes have been implemented, most notably the introduction of the Planning and Development (Local Planning Schemes) Regulations, 2015, it is evident that there is frustration across all sectors with a perceived lack of progress on meaningful reform. It is therefore vital that a commitment to meaningful and holistic review is demonstrated through progressing final recommendations through to implementation. This will require commitment and leadership from the state.

As the reform proposals cover a broad spectrum of issues, and some are longer term proposals, there is a risk that the reform process may lose momentum leading to frustration about a perceived lack of progress. The above prioritisation will assist with this, but it is also recommended to identify a series of ‘quick wins’ that can be implemented relatively quickly. This will help to build momentum and good will amongst both the planning profession and wider community as a certain amount of change and commitment to progressing with the reform will be visible. Some suggestions for quick wins are:

- Developing an interactive, legible and user friendly online planning portal for local

planning schemes,

- Providing that DAP meetings are held at regular times, and
- Preparation of a framework to allow parties with a sufficient interest in a matter to be heard during SAT mediation of DAP matters.

There are also significant changes proposed to the content and format of the local planning framework. Preparing the regulatory documents and guidance required to implement this change will be resource intensive at the state level. This also has the potential to create uncertainty for local governments who are currently undertaking comprehensive reviews of their planning framework, as is required of many local governments by the Planning and Development (Local Planning Schemes) Regulations, 2015. It is important to ensure that these can still progress in an efficient manner without any risk of them being put on hold at state level because of potential changes to the content and format of the planning framework, and state resources being directed and diverted to the preparatory work on these documents. There needs to be sufficient capacity at the state level to deal with both 'business as usual' matters, and the implementation of the recommended changes to the format and content of the local planning framework.

The difficulty in addressing regional, state and national issues at the local level, such as growth and settlement management, also needs to be given due consideration. A locally-led approach is beneficial and necessary. Notwithstanding, many of the challenges faced by local governments today stem from the tension between advancing state objectives, such as infill, and local interests, which are often not supportive of such objectives. Engagement done correctly and from the outset can assist with this, however is unlikely to fully resolve these competing interests. On issues of regional, state and national importance, such as responsible urban growth management and infill, there is a case for state government leadership to be more firmly demonstrated. This may include playing a greater role in educating the wider community about state policy on growth management, what informs it and the need for such policies (such as the need for responsible growth management and infill in appropriate locations). Argument and debate about the principles of such objectives at the local level could then be avoided, ensuring that time and energy at the local level is focussed on shaping growth in a locally responsive manner.

Recommendations relating to the provision of greater guidance by the state government on local planning instruments also need to be carefully considered and managed to minimise the risk of introducing further layers and rigidity to the already complex process. Adding more layers and rigidity to the process would be counterproductive to the overarching objectives of the reform, particularly legibility and efficiency.

2. Detailed Comments on Individual Review Proposals

The following comments on specific review proposals are provided for the purpose of providing guidance on the further development and refinement of these proposals.

A Strategically-Led System

Review Proposal 1.1.3

Provide in the LPS Regulations that a complex scheme amendment must be informed by, and respond to, a review of the local planning strategy.

Whilst the intent of this proposal is supported as one of the reasons a complex scheme amendment can be classified as complex is due to inconsistency with a Local Planning Strategy, this proposal has the potential to add another layer to an already complex and lengthy process.

Further, inconsistency with a Local Planning Strategy is not the sole reason that an amendment can be considered complex. For example there are circumstances where an amendment may be

considered complex due to the built form outcomes of the amendment being different in scale to that of the established character (Regulation 34), and built form is not a matter that is dealt with by a Local Planning Strategy. However, the built form being proposed may be consistent with the zoning and/or infill strategy contained in the Strategy. It is therefore suggested that:

- This should only apply where one of the reasons for the amendment being complex is due to inconsistency with a Local Planning Strategy; and
- The most efficient method of undertaking both processes concurrently is employed.

The definition of a complex amendment is also so broad that it encompasses even relatively modest changes. Update of the Local Planning Strategy would only be necessary if the definition of Complex Scheme Amendment was modified (and/or interpreted) to be of much more substantial scale. This in itself has merit and reflects the understood intent of the complex classification. If the definition of a Complex Amendment is not modified, it would be preferable to recommend that the review proposal be amended to read “If an amendment to the local planning scheme creates a conflict with the local planning strategy, it must be accompanied by an amendment to the local planning strategy.”

Review Proposals 1.3.1 and 1.3.2

1.3.1 Provide that every local planning strategy include a local housing strategy, except for low growth and regional local governments, which only require basic local planning scheme requirements.

1.3.2 The DPLH to provide guidance for local government in the Local Planning Manual on how to prepare a Local Housing Strategy, including methodology for local housing analysis.

In developing and implementing review proposals relating to local planning strategies it is important to consider and understand their intent and role in the overall planning framework. Local planning strategies should provide a coordinating framework addressing key themes of housing, employment, centres and integrated transport but be structured to enable more detailed strategies focussing on key priority areas to fit into this overarching framework. This enables a more staged, targeted and ultimately effective approach to strategic planning.

The Local Planning Manual currently sets guidance for what should be covered in a Local Planning Strategy and includes reference to a population and housing section. This section of a Local Planning Strategy incorporates what would be included in a local housing strategy. As this is already covered in the guidance document the proposal should therefore relate to enforcement of this requirement (ensuring that the population and housing sections of all local planning strategies incorporate strategies relating to housing and infill).

In response to review proposal 1.3.2, guidance from the state government would be useful to establish a consistent approach that is readily accepted by the DPLH as the basis for each local governments allocation of housing types in the locality, which is appropriate for each local government and supported by the community. This methodology would need to be robust enough to account for the differences in planning for greenfields and infill areas. It is also critical that a strategically-led planning system incorporates short - (5 to 10 years), medium-(10 to 15 years) and long-term (30 years and beyond) planning. The analysis should be based on the latest ABS census data and population projections, and updated and reviewed every five years to align with the release of census data. This will ensure the analysis accurately reflects the current projections and needs of the locality, allowing growth to be responsibly planned for and managed.

Ensuring the methodology considers short, medium and long-term planning is critically important for a number of reasons;

- To ensure sufficient capacity is provided for in the long-term in infill environments, where fragmented landownership limits capacity for redevelopment and increases the risk of underdevelopment;
- To align long-term strategic planning with long-term infrastructure commitments and needs

- (public transport, schools and the like). Plans considering short-term planning horizons (i.e. 5 years) are insufficient for proper infrastructure planning in infill settings; and
- To recognise that places evolve over time to respond to changing demographic profiles, technology, social trends and market conditions.

Currently there is an expectation that the dwelling targets provided in Perth and Peel @ 3.5 million is what a Local Planning Strategy should plan to accommodate. This is problematic as these are arbitrary figures that are not based on any detailed analysis of likely population and dwelling growth having regard to the latest census data, and other state policy guidance on the extent and level of density expected in certain areas (activity centres, station precincts, urban corridors and the like). This is leading to a disconnect between what the local communities expectation is and what the evidence is saying local governments need to plan for (an important consideration of any local planning strategy).

To align these dwelling targets with such considerations would be a significant undertaking for the DPLH and is more the role of the local government. It is therefore suggested that a further review proposal should consider removing the targets specified in the Perth and Peel @ 3.5 million suite of documents. These documents should instead set a model for delivering infill and allow local governments to determine the required dwellings based on this guidance and the latest ABS data. In addition to the guidance provided in the spatial plan about where dwelling growth should be located, this may also include providing guidance on expected levels of density in these areas and/or the factors that should inform density in Centres.

Housing distribution and growth is a key element of the local planning strategy and needs to be underpinned by a clear methodology of how the local government has arrived at their conclusions and proposals to ensure transparency for the community. While State Government may set dwelling targets for each local government, it should be left up to the local government to determine in consultation with their community where additional dwellings should be located and how density targets are being achieved. This should occur within the State's strategic framework of activity centres, urban corridors and station precincts. The type and proportion of additional dwellings being provided should be based on a housing needs assessment carried out by the local government as a one size fits all approach doesn't work.

A Legible Planning System

Review Proposal 2.4.1.

Require that a local planning scheme be published with the inclusion of the Local Planning Strategy (in the form of a local strategic statement) and Local Planning Policies in a document to be called a "Comprehensive Local Planning Scheme."

The recommendation that local planning strategies, schemes and local planning policies be grouped into a comprehensive local planning scheme is supported in principle but requires resolution of the details and resourcing implications of implementation. In many instances comprehensive review will be necessary to achieve a workable outcome and meaningful improvement, and the clarification on document roles and templates recommended in the paper will be vital.

This document should also include the integration of the deemed provisions. It is not clear if this comprehensive document would comprise the entire local planning strategy or merely one statement/vision of the strategy. Reference to the word 'scheme' requires further clarification, as to how it would work and what the implications of it would be. Agree that the planning objectives from the Local Planning Strategy should be included in the Local Planning Scheme to establish a clear link between the Local Planning Strategy and Local Planning Scheme.

Whilst the improvement in the alignment and 'line of sight' of these documents is supported, it is critical that their statutory roles and functions remain unchanged. For example the role of local planning policies providing guidance on the application of discretion is vital to ensuring an appropriate balance between certainty and flexibility, and ultimately achieving good planning outcomes for the locality. A bigger issue for complexity is repetition of scheme provisions in planning policies. This creates unnecessary duplication and confusion as to the statutory weight of repeated provisions.

Formally including the whole Local Planning Strategy and the Local Planning Policies in one document, blur the role of each document and could create confusion. The current process for the preparation and amendment of Local Planning Policies, with approval resting with the local government, provides for a streamlined quicker process than that for the amendment of a Local Planning Scheme and therefore enables local government to respond more quickly to address issues. To introduce a requirement for Local Planning Policies to be approved by the State Government appears contrary to the reform principle of efficiency.

Review Proposal 2.4.3

Local governments currently undertaking, or about to embark on, a substantive review of their planning frameworks delay preparation of local planning strategies and local planning schemes (and related omnibus amendments) until guidance on the format and content of local planning frameworks is available.

This is not endorsed as guidance on the format and content of local planning frameworks is likely to be some time away with the White Paper still required to be prepared. The City of South Perth is progressing with the preparation of its Local Planning Strategy, with Council shortly to sign off on commencing the community engagement. To delay this would not align with community expectations for delivery of the strategy and potentially waste significant resources which have already been invested in this process. The City would be happy to work with the DPLH and be a new test case for a new model Local Planning Strategy, or suggest that the new state planning framework can be applied at the next review or through an omnibus amendment. This proposal could have a significant negative impact on the ability of local government to progress towards their infill targets

Review Proposal 2.4.5

The DPLH to provide guidance in the Local Planning Manual on the appropriate use of each planning instrument.

Additional guidance is supported as the complexity of each of these documents produced under various planning instruments should be related to the level of complexity of the site or circumstance. i.e. different issues need to be considered for urban infill areas than within greenfield sites. A one size fits all approach does not work. Above all, in any additional guidance there needs to be an emphasis on differentiating how these instruments may differ between infill and greenfield applications.

Review Proposal 2.6.1

The LPS Regulations be amended to provide that local planning policies are to be prepared in a manner and form approved by the WAPC.

The City does not support the need for WAPC approval of local planning policies as it:

- Unnecessarily reduces the powers of local government and is therefore contrary to subsidiarity principle of leaving powers and responsibilities to the lowest level of government practicable;
- Creates a more complex process which is contrary to reform efficiency. The current process for the preparation and amendment of local planning policies, with approval resting with the local government, provides for a streamlined and quicker process, compared to that associated with a Local Planning Scheme which requires State Government approval. This enables local government to respond more quickly to address current issues; and

- Is likely to create significant resource implications for State Government which has historically experienced lengthy delays in the efficient processing of local planning documents such as local planning strategies and local planning schemes and associated amendments.

Review Proposal 2.7.3

Provide in the LPS Regulations that there are deemed provisions which set out standardized zones, land uses and land use permissibility which:

- Group like-land uses into themes for which common development standards can be prepared*
- Identify low risk land use proposals by including suitable parameters for which a streamlined planning process apply*
- Are mandatory for local government to adopt within their municipalities through the next scheme or omnibus amendment*

Standardised zones and land uses are supported, and currently included in the Model Provisions. Notwithstanding, caution should be exercised in providing standardised land use permissibility's for certain zones as what is appropriate in a particular zone in one locality may not be appropriate in another. For example different activity centres and commercial areas have different functions and needs. Therefore different uses will be appropriate in different centres and commercial zones.

Review Proposal 2.8.1

Provide in the LPS Regulations that there can be a location within the model provisions for mandatory development requirements.

It is agreed that there are circumstances where the local community and developer wants certainty over development outcomes, especially in transition areas between higher and lower density development or between heritage and higher density development or similar. Clarification is required that these development standards represent hard and fast limitations which cannot be varied by the decision maker.

In addition to the ability to include mandatory provisions, there should also be some limits imposed on the extent of variation of key planning provisions such as building height as well as guidance provided on the proper application of discretion. Significant variation of key planning provisions undermines the planning provisions and does not aid in building community trust in the planning process and the decision makers.

A Transparent Planning System

Review Proposal 3.2.1

The DPLH should develop a Community Engagement Charter for all aspects of the planning system that includes principles with regard to:

- Planning authorities having a duty to engage with the community in a manner that allows residents to contribute to the making or amending of a strategic plan; and*
- In the making or amending of a strategic plan, the community, as soon as possible, be given information as to what is proposed and any documents that the planning authority intends to examine.*

Stakeholder engagement from the outset of the strategic planning process is vital and the development of a charter will assist with providing guidance on this. However, it should be noted that many local governments already undertake extensive stakeholder engagement in line with the IAP2 framework. These processes also need to incorporate an education component to inform stakeholders of the need to responsibly plan for and manage growth, and the state instruments that govern and inform planning at the local level. This will assist stakeholders in understanding the 'non-negotiables' of planning for growth, such as the requirement for infill. The charter should

also provide guidance on undertaking meaningful and representative engagement to ensure a broad cross section of stakeholder views is captured, and in planning for strategic matters balance the needs of the existing and future community.

This also needs to apply to WAPC/DPLH strategies and community engagement needs to be real, not tokenistic such that the community's faith in the planning system is restored.

Review Proposals 3.3.2 and 3.6.4

3.3.2 Provide in the LPS Regulations that reasons for decisions are to be provided on planning proposals;

3.6.4 Amend the DAP Practice Notes to require reasons for decisions to be given in all decisions made by a DAP, including where the DAP adopts the responsible authority's recommendation contained within the RAR.

The recommendation that reasons for planning decisions are to be published, both local government and DAP, is supported in principle but would unlikely result in significant improvements to transparency as reasons for decisions that are currently published under existing legislation tend to be so generic as to add little value. A coherent system of planning and a well written report on a proposal addressing that system is likely to be far more valuable in communicating reasons for decisions.

With respect to proposal 3.6.4, this is supported provided that the DAP is responsible for drafting and providing the reasons for the decisions on the determination notice. The provision of reasons for decisions should be generally limited to decisions of refusal or where a decision is not consistent with the recommendation of an RAR.

Review Proposal 3.5.1

Provide in regulations mandatory reporting by local government on planning matters.

The proposal for mandatory reporting by local government is supported; however, the further development of this proposal needs to be given careful consideration so as not to place onerous requirements on already overburdened local government resources. Further in order to improve transparency across the whole system it is also suggested that this proposal be extended to include state government. It is suggested that the reporting for local government should relate to the following:

- An up to date strategic framework (LPS and other associated strategies);
- Age and consistency of the Scheme with the model provisions and state policy. It is noted that while some schemes may be older, they may have been regularly updated through amendments and relatively consistent with the model provisions and state policy;
- Amount of decisions made under delegation;
- Amount of decisions made within statutory timeframes.

The State government reporting should at the very least consider the age and relevance of state strategies and policies, and processing timeframes. *Mandatory reporting by State Government on key planning matters should be introduced concurrently with mandatory reporting by local governments, and not left until the unknown second stage as suggested by the Green Paper.*

Review Proposal 3.6.1

Provide for DAP meetings to be held at regular times and outside of business hours.

This will mean that community members are available to attend or provide comment. The process needs to remain flexible to ensure local government has sufficient time to undertake assessment.

Review Proposal 3.6.2

Provide for the recording of each meeting of a DAP and made available on the DAP website of the DPLH.

This is supported as it provides for transparency which is good governance, resources to be provided to the local government to assist in this process.

Review Proposal 3.6.3

Provide clarification in DAP Practice Notes:

- i. If new information is submitted to the DAP after an RAR, the DAP should consider whether a decision should be deferred pending further RAR advice*
- ii. As to when it may be appropriate to defer a decision such as when issues raised which require further detailed technical consideration by responsible authorities.*

This is supported however further clarification should be provided to ensure sufficient time is made available for the local government to undertake a detailed assessment. The local government should be provided with the same opportunity as the applicant in “stopping the clock” where they require further information and details to enable them to provide a detailed assessment of the application.

These recommendations do not address the issue raised in the Green Paper with respect to DAP’s resolving substantive issues by way of conditions which are ambiguous. It is recommended that guidance be incorporated into the DAP Practice Notes on the appropriate use of conditions to address this.

Further with respect to DAP’s and improving transparency of the DAP process the following should also be considered as part of the reform process:

- Removal of the opt-in mechanism for DAP’s;
- Providing more time for the public to read agendas and make deputations; and
- Further clarity around the proposed Chief Presiding Member’s powers, which could present a conflict of interest as a self-regulating body.

Review Proposal 3.6.6

Provide that where a DAP has been invited to reconsider its decision following a SAT mediation, new specialist members be drawn from the available pool of members.

The recommendation that new specialist members consider matters relating to reconsideration of a proposal through the State Administrative Tribunal process is not supported. Whilst the intent of this recommendation is understood it would appear to be unfairly targeting specialist members as the local government members are proposed to remain the same. For this recommendation to be meaningful all members, including local government representatives should be changed. It would also be inconsistent with local government processes for SAT reconsiderations, as the membership of the decision maker (in most instances the Council) does not change through the process. Further, alternate members would be unlikely to have as detailed an understanding of the matter as original members adding to the workload of the alternate members, and potentially the responsible authority as more supporting information would be required. It also has the potential to compromise the quality of decision making. This would be contrary to the key principles of improving efficiency and also another fundamental principle of good planning, sound decision making.

Review Proposal 3.6.7

The SAT should consider preparing a framework for allowing parties with a sufficient interest in a matter to make a submission or be heard during SAT mediations.

The proposal to prepare a framework for third parties with a sufficient interest in a matter to make

a submission or be heard during SAT mediation on DAP matters is supported in principle. Notwithstanding the further development of this proposal requires careful consideration so as not to compromise efficiency in the interests of transparency, as both of these overarching principles are fundamental to a sound planning system. How parties with a sufficient interest are determined needs to be given careful consideration and restricted to parties with concerns relating to fundamental planning considerations.

It is also suggested that a further review proposal consider the introduction of third party appeal rights for DAP applications to allow the relevant local government or a submitter who adjoins the development to apply to the State Administrative Tribunal (SAT) for a review of the decision and also to join as a party to any review of a decision not initiated by a third party.

An Efficient Planning System

Review Proposal 4.1.8

The DPLH and WAPC establish a protocol for the engagement of non-public sector expertise in the scoping and development of policies.

This should be addressed through the proposed Community Engagement Charter. It is recommended that local government also be engaged in the scoping and development of policies.

Review Proposals 4.2.6 and 4.2.14

4.2.6 Provide in the LPS Regulations that a local government must advise an applicant within 10 business days of receipt of a development application whether additional information is required.

4.2.14 Provide in the LPS Regulations and R-Codes a fast-track 30-day planning approval process for single house applications that require only minor variations to the R-Codes.

A number of the recommendations aimed at streamlining the planning process would require development to be workable. For example the recommendation to incorporate in the Regulations that a local government must advise an applicant within 10 business days of receipt of an application whether additional information is required needs further clarification. There are two ways to interpret this; further information being required to enable an assessment to be undertaken or further information/justification/modifications being required following a detailed assessment (including all necessary referrals)

If the former is the intent of this recommendation then the reform needs to focus on promoting best practice within local government as incomplete applications should not be accepted and lodged.

The latter is a key part of the assessment process and integral to ensuring transparency and fairness in the process. If the latter is the intent of the recommendation then this would not be workable, as it is not possible to undertake all the necessary tasks associated with a detailed assessment within this timeframe. A more workable timeframe would be 21 days for standard applications and 35 days for complex applications.

Notwithstanding the intent, this requirement does not necessarily need to be mandated in the Regulations. If it is thought must be given to who will monitor and implement it, as well as what happens if the timeframe is not met. It may be an overly resource intensive requirement for very little gain and ultimately counterproductive to the key principle of efficiency. A better approach would be to have best practice notes on the development assessment process developed, in conjunction with local government and WALGA, and then distributed amongst the industry.

In addition, the recommendation to fast-track single house applications with only 'minor'

variations to the R-Codes would only work if the definition of 'minor' can be clearly and unequivocally established and the assessment process (including consideration of neighbour impacts) resolved to address the very issues that lead to a 'performance criteria' approach in the first place. This definition and the resulting assessment process would then need to be mandated across all local governments, as currently there is a significant variation amongst local government in the definition of minor and the process for dealing with applications involving discretion and neighbour submissions (delegated decisions vs. Council decisions).

Review Proposal 4.2.2

A framework for referral of planning applications, to be incorporated in regulations as appropriate.

The provision of further guidance on what planning applications should be referred to and which agencies and what standards will be used by the agencies to assess these is supported. This will provide for greater transparency, certainty and efficiency.

It appears that better regulation is also needed with respect to the various agency standards used to assess planning applications. Provisions need to be set out in relevant regulations to outline the process for the preparation of standards including the need for any community engagement, the need for regular review of these, and the need for these to be made publicly available.

Public reporting on the performance of various referral agencies in providing responses on planning applications within the required timeframes may also assist in achieving better compliance. This would also provide greater transparency and enable State Government to better identify where issues lie in the planning process, and where future planning reform should be focussed.

There is also considered to be an opportunity to streamline the planning process when it comes to planning applications requiring WAPC approval. The current process requires an application to be lodged with the local government, who then refers it to the WAPC, who then refers it to agencies for comment. It would be more efficient if such applications were referred to agencies at the beginning of the process by the local government.

Planning for Consolidated and Connected Smart Growth

Review Proposal 5.1.1

That the State Government develops clear arrangements for the planning and delivery of the key urban infill locations of activity centres, urban corridors and station precincts, including prioritising of areas which require State and local government collaboration.

The State Government in partnership with local government should prioritise locations for infill development based on infrastructure availability, land ownership, lot sizes, etc. Not all activity centres and station precincts identified for infill developments should or need to be developed immediately and some may have constraints that need time to overcome, such as infrastructure provision/upgrades. This requires a genuine partnership between local and State government to ensure the community is brought along on the journey. A top down approach as practiced as part of Perth & Peel @ 3.5millin has not been working. This also needs to recognise that a one size fits all approach does not work and local application of the broader strategic concept needs to be made possible.

Review Proposal 5.2.1

A new Consolidated and Connected Smart Growth State Planning Policy that builds on the State Government's METRONET policy and established contemporary smart growth principles and practices.

Whilst the intent of this proposal (Smart Growth State Planning Policy) is understood it is unclear

how this would relate to existing strategies and policies that currently deal with elements related to Smart Growth Principles (Perth and Peel @ 3.5 million and State Planning Policy 4.2 and the like). It is recognised that more clear, consolidated and coherent guidance around this principle is needed, however, more detail around how this might work needs to be considered and worked through. It is also unclear how the Metronet Policy relates to more general policy guidance on this matter, as there are other areas that need to be considered in a Smart Growth Policy aside from those that are associated with Metronet.

Review Proposal 5.6.1

The MRS be updated to include "Urban Corridor" as a category of Reserved Roads based on Perth & Peel @ 3.5million, with the Department of Transport being made responsible for coordinating a whole of transport portfolio response to planning proposals along the corridor.

This should be expanded to include urban and sub-urban zoned land under the MRS spatially identified redevelopment areas and accommodate special transit corridors that can accommodate light rail and rapid bus transit.

Review Proposal 5.6.2

A review be undertaken of regional road reservations in place to accommodate road widenings within the Metropolitan Region Scheme for designated Urban Corridors.

A regular review process for region schemes, similar to that for local government planning schemes, needs to be built into the regulations. A broader review of regional planning schemes is also needed with the processes for planning and development of reserves under the regional planning schemes. This should specifically address the need for rapid transport corridors, as outlined above in 5.6.1.

Review Proposal 5.7.1

Liveable Neighbourhoods be elevated to a state planning policy and maintained and refined as a best-practice approach to the new greenfields development at regional, district and local level, rather including it into a single Neighbourhood part of Design WA.

An equivalent document needs to be prepared to guide infill developments of existing neighbourhoods as high priority, much higher priority than reviewing Liveable Neighbourhoods.

3. Further Meaningful Engagement

It is understood that the intent of the Green Paper is to encourage discussion and meaningful debate, ultimately leading to the development of a White Paper. Further meaningful engagement with all industry sectors and all users of the planning system will be integral to refining and developing the review proposals further. With respect to further meaningful engagement with local government it is suggested that the reform team consider setting up a number of working groups with the assistance of WALGA. Three working groups for local government administration should be set up, one for inner and middle metropolitan local governments, one for outer metropolitan local governments and one for regional local governments. At the very least these working groups should include all directors and planning managers (both strategic and statutory/development assessment). Three similar working groups for elected members should also be set up. It would be up to the Council of each local government to determine which elected members would participate.

The above comments are provided for the purpose of assisting with the further development and implementation of the review proposals. The City looks forward to participating further in the review process.

Yours faithfully,

Elyse Maketic
MANAGER STRATEGIC PLANNING