

CITY OF JOONDALUP'S SUBMISSION
LIVEABLE NEIGHBOURHOODS DRAFT EDITION 3

The following comments are made with particular reference to stated objectives (O) or requirements (R) and are referred to where applicable using these headings.

Element 1 – Community Design

O7

This objective emphasises environmental protection and also refers to ensuring design of neighbourhoods takes into account areas of cultural significance. It is considered that cultural significance is sufficiently different in its components from environmental significance to warrant being set out as a separate objective, inclusive of heritage significance.

O8, O9 & O10

These objectives have been added and relate to sustainability, including better water management and the natural environment protection, and enhancement of public transport system linkages in the urban structure, and a focus on activity centres rather than towns. These objectives support the objectives of the Network City: Community Planning Strategy for Perth and Peel Regions (NC) released by the WAPC which is being advertised for public comment at present. The new objectives provide further consistency in direction for urban design and planning in urban areas and are therefore supported by the City.

R3 – Neighbourhood and town structure

The proposal to describe the walkable catchment (“ped-shed”) for lots in relation to the average number of dwellings per hectare rather than in relation to the R Codes density does not change the intention yet is more accurate because the density under the R Codes may not reflect the true dwelling density since this is only a maximum density. The City therefore supports this change.

R4 – Neighbourhood and town structure

The addition of “ sites are identified, and facilitated by design, for a wide range of business and employment opportunities” is fully supported because it emphasizes the importance of sustainability in neighbourhood and town structure designs.

R12 – Street network and lot layout

It is considered that a street network limiting the extent of lots fronting culs-de-sacs to 15% may not be an equitable requirement and the basis for it is not understood. Lots in culs-de-sacs widen significantly from the front boundary to enable dwellings to be constructed with a front setback in accordance with the Residential Design Codes (R Codes) and it is this setback that is effectively the frontage for the purposes of subdivision assessment. Should the intent be to limit the overall extent of culs-de-

sacs with the intent of providing a more transparent road network however, the result may be a more connected community which the City would support.

R14 & R15 – Mix of uses and employment

It is noted that the provision has been added requiring land to be allocated in District Structure Plans to provide jobs for around 60% of the new population of that area (0.8 jobs per household, based on total employment of 1.3 jobs per household), and sufficient non-residential land needs to be provided. Whilst the City does not seek to comment on the percentage allocation without further research, it generally supports the requirements because they are consistent with the objectives of NC.

The use of the term “efficient urbanism” is jargon that is not readily understood and should be explained in plain terms.

R19 – Density and mix of housing types

“Gated communities” do not facilitate wider community connection and can create problems associated with their impacts on streetscapes, safety, equity and affordability. The City acknowledges that certain types of residential development such as aged care complexes would gain some benefit from a “gated” arrangement, however, on the whole the City does not support these arrangements and is therefore supportive of R19.

R23 – Community safety, social capital and health

This new requirement is supported as it emphasizes the importance of safety and passive surveillance with regard to the urban design of neighbourhoods.

Element 2 – Movement Network

The City generally concurs with the amended indicative cross-sections of roads and road reserves showing the arrangement of services, lighting, planting, footpaths/cycle/dual use paths and vehicular traffic for various types of roads. Concern is raised however that the proposed pavement width of 7.2 metres shown in Figure 11 for Neighbourhood Connector roads may be inadequate and suggests that the provision of car parking embayments may be a better option.

R30 & R31- Footpaths

The provision of paths on both sides of streets is encouraged by the City. The proposed alignment of paths immediately adjacent to property boundaries is generally supported, however it is noted that this arrangement ‘splits’ the verge which may make it difficult to locate services, lighting and adequate tree planting in the verge to the best advantage of users of the paths.

R54 - Stopping site distances

The City has no objection to the reduction in corner truncations, provided that there is adequate sight distance for safe vehicular and pedestrian movements. It is suggested, however, that truncations be provided in conjunction with road narrowing at laneway/access street intersections rather than as an alternative traffic calming technique.

R57 – Intersections

Whilst the City supports the principle behind reducing kerb radii to 9 metres at neighbourhood connector/access street intersections to slow traffic and reduce pedestrian crossing distances, it needs to be acknowledged that ‘tightening’ intersections inevitably results in an increase in damage to kerbs and paths in these locations, particularly during building construction stages of development of a subdivision, which is a cost that would be borne by the developer and/or the local authority over time.

Element 3 – Lot Layout

O12 and R3 – Density and diversity

This new objective and requirement addressing personal and property safety in terms of rear lane access is fully supported since there are many laneways within the City and City Centre. The additional wording provided regarding laneway block lengths clarifies the intent that passive surveillance is desirable to laneways.

R8 – Lot size and shape

The proposal is to amend R8 in LN2 stating that the WAPC may agree to vary the minimum lot size by up to 10% to permit as much as a 15% variation, provided that the average lot size for the specified R Code is maintained and having regard for a number of factors, including an approved Detailed Area Plan (DAP). It is not apparent why this change is proposed. The City is concerned that a further reduction in lot sizes will make it very difficult to comply with other provisions of the R Codes and will result in a necessary increase in development applications addressing the Performance Criteria of the R Codes. The City is therefore concerned about the built form and streetscape outcomes that could result on lots of 374m², 170m² and 136m² that could be approved in R20, R40 and R60 areas respectively that make up the majority of the City’s residential land.

R10 & R11 – Lot size and shape

Greater clarity regarding the shape of lots and the importance of regularity in lot shape provided by these requirements is of significant benefit to local authorities in the assessment of subdivision applications.

R16 - Neighbourhood centres

The addition of R16 in recognition of the need to set aside land for small retail and related uses within neighbourhood centres, with appropriate road reserve widths to

facilitate on-street parking, is supported as these centres are focus of many for communities.

R36 - Detailed Area Plans (DAP's) for small lots and special site conditions

Some requirements of LN2 have been reworded or omitted in LN3 to provide greater consistency with the R Codes which offer greater flexibility in residential design by enabling an applicant to address Performance criteria. This is a positive step towards removing some conflicting directions within these two documents and may encourage increased use of LN3 in submissions for development approval.

R37 - Detailed Area Plans (DAP's) for small lots and special site conditions

The use of rear lanes for vehicular access to properties is acknowledged by this new requirement and are well illustrated. A number of criteria are set out that are aimed at ensuring that these lanes provide adequate personal and property safety. Given that there are many areas of the City, including the Joondalup City Centre, where rear lanes are in place, the direction offered in this requirement will be beneficial in the assessment of Structure Plan and subdivision applications.

Element 4 – Public Parkland

R2 –Public parkland

The addition of R2 which stipulates a minimum district park size of 3.0 hectares for passive and active recreation is supported, however the City considers that this area may be inadequate in some circumstances, in particular when native vegetation is required to be maintained or the public open space (POS) is used for drainage purposes. A more flexible approach to a minimum POS area is preferred to enable local authorities to determine the need for such spaces based on site-specific circumstances and proximity to similar areas.

R4 & R5 - Amount of POS

Whilst LN3 elaborates on the 2% reduction in the area of POS that may be approved by the WAPC as 'restricted use', there is concern that these 'restricted use' areas may be reduced further under a management plan, and that buildings such as community facilities and schools may be permitted in these areas, thereby reducing their viability for the retention of natural features such as native vegetation and bushland.

R8 - Foreshore reserves

The proposed 'guideline width' of 100m for coastal foreshores widths is considered to be a minimum requirements, one that is also considered on a case-by-case basis with significant input from local authorities.

R13 - Local parks

Small parks that are intended by this requirement are considered to be limited in their ability to provide recreational opportunities, rather, they appear to be excessively wide pedestrian accessways.

R20 - Integrating stormwater and public parkland

The City has concerns about the use of POS areas for urban water management and the impacts of drainage on native vegetation and in this regard does not support drainage into bushland areas.

The City has ongoing concerns about useability of POS being measured in terms of 1:10 year storm events. Since this appears to no longer be the major criteria for determining useability, rather the extent of permanent inundation is to be used, this is seen as a positive direction in ensuring that these public spaces are primarily capable of being used for their intended purpose.

R32 & 33 – Cash-in-lieu and transfers

The improved guidelines regarding ‘credits’/allowances for drainage in POS provided by this requirement is appreciated.

R34 & R35 – Development of POS

Development of POS area/s by the subdivider to a minimum standard, including such features as lighting, is supported as a means of ensuring good quality POS. However, the proposal for subdividers to manage these POS for 2 summers only is considered to be inadequate in duration since the City’s currently requires their management for 3 summers under agreements

In addition, the City is concerned that the intention is for the WAPC administers management requirements which are currently the City’s role.

Element 5 – Urban Water Management

An integrated approach to urban water management proposed regards stormwater as a resource rather than an after-thought and is fully supported as a means of achieving water-sensitive urban design. The objectives of best management practice for this purpose are supported by the City, however it needs to be acknowledged that this is likely to cause an increase in the operational costs to local authorities because the alternatives to drainage sump sites are more difficult and costly to achieve.

Element 6 – UtilitiesR8 & R9 – Services locations

The City strongly supports the principle of requiring verges of sufficient width to accommodate all services and, in particular, verge alignments for street lighting and street trees that are compatible with the location of dual use/cycle and footpaths.

In addition, the use of rear laneways for the location of services where possible without compromising community safety is supported in an endeavour to reduce primary street verge widths and to provide a better interface between the primary street and lots, and more efficient use of land.

R23 – Public lighting

The additional requirement to design lighting with regard to energy efficient practices and technologies is fully supported.

Element 7 – Activity Centres and Employment

The City supports the requirements of LN3 in regard to Activity Centres and Employment as a key element in the delivery of well-structured urban areas and the creation of an effective context for the underlying principles of ‘main street’ centres, home-based businesses, location and design to support public transport, denser residential development in close proximity, and the creation of a unique sense of place and local identity for these centres.

The City therefore supports the principles of “planning for employment/ business” within activity centres as it aims to provide jobs locally rather than to perpetuate the “dormitory suburbs” phenomenon which is especially evident in outer metropolitan suburbs where large greenfield lots are subdivided and developed. Recognition of land uses other than retail/commercial as existing or potential Activity Centres, such as educational institutions, hospitals and industrial estates, is pertinent to achieving the overall objectives of LN3 and is also in line with the City’s perspective on these types of land uses in terms of them being a focus for people activity.

However, good design and sensitivity to the impacts of the integration of commercial and residential land uses, including home-based businesses, will be necessary in evaluating the adequacy of these centres during the Structure Plan stage of development. The City currently experiences noise complaints where commercial land uses are combined with or located near residential land uses, such as in the Joondalup City Centre and the full effect of combining these land uses and setting out the proposed requirements is not always evident.

Element 8 - Schools

O5

The safe design of surrounding street networks to enable safe access and adequate on street parking near schools is fully supported by the City.

O9

The City supports the provision of “schools - in - shops” and “schools - in - homes”, such as occurs in Clarkson, until such time as the appropriate infrastructure is developed for new communities.

O11

The City supports encouragement for urban schools to be located on smaller sites within neighbourhoods in terms of the rationalisation of land, as long as the buildings are appropriate to the age group and accessibility of its pupils.

General Comments

LN3 is a very comprehensive document that is generally supported by the City. It now includes other objectives and requirements that are consistent with the State Government's planning direction. A number of additional diagrams and figures have been included in LN3 which considerably improve understanding, however the use of colour to distinguish certain sections is strongly encouraged to assist the user.

One of the most confusing aspects of LN3 is the fact that there is reference throughout the document to objectives, requirements and key differences from current practice using the terms either Liveable Neighbourhoods or LN as if these are additions within LN3, which is not always the case. For instance, generally the objectives and requirements of LN2 have been adopted or amended and others simply added to these such that considerable checking of both documents is required to determine what is new and therefore seeking comments. The summary of key changes provided does not provide details to assist in this process. It would have been most helpful for the draft LN3 to be presented as a tracked copy, especially in view of the constraints placed on local authorities to respond within the submission period.

As a general comment about POS provision, whilst the City supports the planning and social principles behind arranging public open spaces (POS) within walkable catchments in residential subdivisions, it also has concerns about the overall resultant diminution of large areas of POS in the locality that would service neighbouring residential communities as district or regional open space, as well as provide maximised recreational opportunities. This is particularly evident in outer suburbs of the metropolitan area in areas of greenfield developments, such as the Cities of Joondalup and Wanneroo. It is appreciated that these larger parcels of POS are made available as reserves by the WAPC and local authorities have limited influence to require developers to provide such spaces yet there appears to be a conflict in the objectives of LN3 in providing for the greater community.

LN3 would benefit from addressing some errors and omissions in the document, some of which are noted below:

- five climatic zones are noted in the explanatory text in Element 3, however seven zones are shown on Figure 1 to which the text refers.
- no definition of "target density" is provided, only for "urban density" which is questioned. Where have the percentages of POS, streets and residential lots proposed been derived and do they represent all subdivision outcomes?
- term "social capital" in Element 3 is not defined nor commonly understood and should be explained or avoided.
- term "looped" residential streets in Element 3 is not explained or shown figuratively.