



Directions 2031
City of Joondalup Submission

Summary

Generally, the principles outlined in Directions 2031 are supported, in particular the designation of Joondalup City Centre as a Primary Centre is appropriate and fully supported. However, a clear commitment by the State Government is needed to ensure at that government priorities are aligned across agencies to enable the delivery of the aspirations of Directions 2031.

Designation as Primary Centre

From its inception, the primary intention for Joondalup has been to provide a true city centre that services the entire northwest corridor. This intention has remained unaltered through the various incarnations of metropolitan planning. As the regional centre serving the largest population of a sub-regional corridor, the Joondalup city centre must remain at the highest level in the hierarchy in order to achieve its intention of a commercial, civic, cultural and recreational hub for the region. The designation of Joondalup City Centre as a Primary Centre is considered critical to this intention and should remain the sole Primary Centre for the northwest corridor, and is appropriate and fully supported for the following reasons:

- Joondalup is centrally located within the northwest corridor.
- 30 years of long term strategic planning of the northwest corridor, with Joondalup as the Primary Centre, has successfully underpinned the creation of communities and investment in infrastructure, and full advantage needs to be taken of this long term and consistent approach.
- Major facilities such as the Joondalup Health Campus, ECU Campus, TAFE campus are unlikely to be replicated in any other centre in the northern corridor.
- Joondalup has a well developed public transport system, including a CAT bus, which will allow the city centre to develop and mature.

Alignment of State Government Policy and Expenditure

As stated, the designation of Joondalup City Centre as a Primary Centre is considered appropriate, and is fully supported. However, it will be critical that the State Government make a strong commitment to support the Joondalup City Centre by infrastructure and employment generation. This will require a whole of government approach to the commitments made within Directions 2031. While it is acknowledged that Directions 2031 may not be the place to outline specific initiatives, it is expected that the sub-regional plan should clearly articulate how the government will be supporting Joondalup as a Primary Centre.

This alignment should include consideration of Joondalup as part of the State Government office accommodation strategy, the spatial distribution of regional cultural facilities, and the provision of housing diversity.

Furthermore, public transport is a key area for policy alignment and infrastructure decisions. Local Government has little direct control over public transport, and therefore the Public Transport Authority programmes need to be fully aligned and committed to the aspirations of Directions 2031. The PTA programme to build additional car bays at rail stations is an example of the need to address current demand issues while also helping to deliver the

more effective use of land by delivering on the principles of Transit Orientated Development and good urban design outcomes.

This document also provides the opportunity to discuss granting air rights over the rail line in the Joondalup City Centre as a way to support further development within the City Centre. It is recommended that the State Government identify how this can be achieved from both a legal and physical perspective, with an appropriate policy framework applied consistently across the metropolitan areas.

Housing Targets

The need to improve on existing housing infill trends is acknowledged and supported, however the more realistic target of 47% (as opposed to Network City's 60%) is considered appropriate. It is anticipated that further detail will be contained within the Growth Management Strategy for the Northwest Corridor due to be released by the WAPC later this year.

Directions 2031 states that the preferred growth model is that of the 'Connected City'. While this growth model is supported, the document does not sufficiently demonstrate, through statutory or policy measures, how this is to be achieved. An emphasis from the Department of Planning to work in partnership with local government to achieving a common vision and way forward is welcomed and is considered essential.

The potential for increased residential density in areas adjoining transport hubs, such as railway stations, is identified, however this will need to be more fully addressed in the growth Management Strategy and future regional structure plan.

While the targets in Directions 2031 for infill development have been reduced somewhat, there will be an inevitable increase in demand on local infrastructure, which will need to be considered by all levels of government to ensure that infill is implemented in a sustainable manner.

Overall, it is considered that as an aspiration, a target of 47% infill by 2031 is appropriate. How this is translated into reality will need to be carefully considered as part of the City's review of District Planning Scheme No 2.

Implementation

There are 44 key actions outlined to implement Directions 2031. There is a danger that Directions 2031 will be seen as a plan to prepare more plans. The actions to implement Directions 2031 must be made clearer and more targeted in their approach. Those actions should then be highlighted within the document, rather than 'buried' within the text as is currently the case.

This approach would also be in line with the WAPC and Government aim of reforming the planning system.

Economic and Employment Strategy

A Perth and Peel Economic and Employment Strategy is to be prepared as an implementation task of Directions 2031. It is considered that this will be key to making the transition from the aspirations of Directions 2031 into real strategies to increase employment in the sub-regions. The work, if it is to be successful, will require a sub-regional approach to investment and employment and a strong collaboration between state and local government.

Activity Centres for Perth and Peel
Draft State Planning Policy
City of Joondalup Submission

Summary

It is considered that the principles and policy aims of the Activity Centres Policy is sound. That is, the attempt to evolve centres from retail shopping centres, to those that provide a range of community activities, employment, retail and residential components is supported.

Of concern, however, is how the draft Activity Centres Policy and in particular the 'mixed use threshold', will be implemented and managed.

Mixed Use Thresholds

A simplistic view of the new Policy is that it has merely removed the shopping floorspace caps on shopping centres. However, in reality, the removal of caps has been replaced with a 'mixed use threshold' that requires the provision of a 1 for 1 shopping ratio of floorspace to commercial floorspace if any expansion (above a certain sqm threshold) is to occur.

While the mixed use threshold is proposed as a way to ensure that activity centres provide a more diverse range of uses, it is unclear how this can be successfully implemented. Centre plans may be adopted as the blueprint for development of the centre, however, there would appear to be no mechanism to ensure that all the uses proposed are actually developed. This could lead to the retail floorspace being developed well ahead of other uses.

It is recommended that the processes to ensure the appropriate development of activity centres occurs in an appropriate manner (including staging) be considered to ensure that the policy aims of the draft strategy can be appropriately implemented. It is also recommended that the '1 for 1' ratio above 15,000sqm floorspace be thoroughly tested within the marketplace, as there is a concern that the objectives of draft policy cannot be achieved at that ratio.

Centre Plans

The draft policy states that Centre Plans should be prepared by local government for endorsement by the WAPC before approving major developments in activity centres.

Pressure is likely to be exerted by shopping centre owners for centre plans to be prepared sooner rather than later. This is particularly the case for Whitfords Shopping Centre. However, there is a possibility that the preparation of centre plans may not occur within the timeframes required by developers. This could lead to development applications being lodged ahead of centre plans, with a likely outcome that deemed refusals will then be the subject of State Administration Tribunal review, taking the planning control away from local government. How these ambitions are reconciled with resourcing and realistic timeframes will need to be carefully considered.

The draft Activity Centres Policy indicates that local governments will continue to be required to prepare Local Commercial Strategies. These will be used as the basis for preparing and amending local planning schemes, and for preparing and assessing centre plans. There will need to be a clear alignment with any adopted Activity Centres Policy and Local Commercial Strategies to ensure the integrity and consistency of the hierarchy is maintained.

There is a concern how Centres Plans will be treated in the Model Scheme Text. Specifically, there needs to be greater clarity regarding the Centre Plan approval process and the process for approving Structure Plans produced by landowners. This clarity needs to ensure that a scenario of a landowner producing a Structure Plan cannot be treated or viewed as a Centre Plan. Such an outcome would be unsatisfactory given that the proposed changes to the Structure Plan process has the potential to circumvent Council consideration of the best possible planning outcome for a centre.

Economic Impact Assessments

The draft Policy states that there will be an expanded role for economic impact assessments as a decision making tool for the assessment of rezoning and development proposals involving major retail uses. It appears these assessments would be prepared by the proponent as part of a development application, however must be prepared in a manner that allows the analysis to be readily verified by the responsible authority. This is considered to be appropriate.

Housing targets within Activity Centres

The policy of ensuring appropriate R Codes over activity centres is supported. However, the Housing Target table (page 9) indicates that the desirable R Code for the Joondalup City Centre is approximately R90. This is considered somewhat arbitrary, with density of residential development more likely to vary across the city centre from medium density to high density. The variety ensures that a diversity of housing types is provided to meet community needs. What is therefore needed is that the desirable target is not construed as a maximum density target.

Centre Plans and Assessment Checklist

While the draft centre framework covers important aspects of centre design, it is considered that the Centre Plans, as proposed, will be overly complex documents. As the preparation of these documents is the responsibility of local government, the required and available resources to prepare these plans will be an issue.

It is recommended that the Centre Plan framework and assessment checklist be reviewed in order to simplify the document, as well as recognise the constraints that will inevitably occur when dealing with existing centres.

Topographic error

Although listed as a District town centre in Table 1 on Page 3, Woodvale has been left off the diagram on Page 4 of the draft document.