



Minister for Transport; Planning; Lands

Our Ref: 72-09655

Hon Albert Jacob JP
Mayor
City of Joondalup
PO Box 21
JOONDALUP WA 6919

Dear Mayor

CITY OF JOONDALUP PROPOSED LOCAL PLANNING SCHEME NO. 3

I write in relation to the draft City of Joondalup Local Planning Scheme No. 3 (LPS 3) and community concern regarding infill development within the City of Joondalup.

The Western Australian Planning Commission (WAPC) recently forwarded LPS 3 to me. As you are aware, the LPS 3 includes residential density codings that were included in the City of Joondalup's existing District Planning Scheme No. 2 (DPS 2) via Amendment 73, in February 2017 (known as 'Housing Opportunity Areas').

I also note that the City has initiated Amendments 88 & 90 to DPS 2 that are currently advertised for public comment and that submissions on these amendments do not close until 23 April 2018. Importantly, if LPS 3 is approved prior to completion of existing Amendments 88 & 90, these amendments will cease to have effect.

It is now unclear whether the City of Joondalup supports the development outcomes facilitated by Amendment 73 and LPS 3 or whether it seeks alternative outcomes through amendments to DPS 2.

At the same time, it is very clear that many members of the community are unhappy with the City of Joondalup's current approach to planning for infill development.

The State Government is committed to the delivery of infill development in order to manage the extent of growth on the outer suburbs of the Perth. Uncontrolled urban sprawl risks locating people in areas with poor access to employment opportunities and services and requires expensive infrastructure to service these areas.

To this end, successive State Governments have set minimum infill targets and provided high-level guidance for the location of infill development. In this respect, in 2010 the infill target for the City was 12,700 (to 2031). The *North West Sub-regional Planning Framework* now identifies the minimum residential infill target for the City as 20,670 (to 2050).

This State Government places priority on locating infill development in areas such as those with access to good public transport, METRONET station precincts and major activity centres. However, local governments are responsible and have authority for establishing more-detailed strategies, in consultation with their communities, which identify the specific location of infill development.

I am greatly concerned that the City is currently advertising amendments to DPS 2 at the same time that LPS 3 is with me for consideration.

As mentioned, there appears to be significant community discontent with the current approach to planning for infill development, developed by the City of Joondalup and approved by the previous State Government, as you would be aware. Representation made to me by local residents indicates that this is, in part, a result of concerns regarding the lack of genuine community consultation.

In light of the above, I urge the City of Joondalup to clarify its community position in relation to LPS 3 and its planning for infill development. I note that it is open to me to refuse LPS 3. The City of Joondalup could then finalise consultation on Amendments 88 & 90 and, in parallel, undertake a consultation process with their local residents about their expectations and aspirations for how infill development is can be provided across the City.

This could be shaped as a strategic review of the City's infill planning, occur in parallel to current statutory processes and include thorough community consultation with all elements of the community. In this respect, examples of good consultation processes could include face-to-face meetings, workshops, surveys and/or mobile information sessions.

Such a review would provide a strategic basis for the City of Joondalup to put forward proposals for consideration by the State Government. Consideration of individual amendments relating to residential density could be ad hoc without such a review.

This could be done in parallel with the review I understand the City is undertaking into its local planning guidelines for multi-dwelling developments. Other Councils have implemented, following extensive community consultation, local planning policies that address the challenges of infill development and get better design outcomes, such as prescribing landscaping, deep soil zones and rear setbacks.

I look forward to your response in relation to my further consideration of the City of Joondalup's LPS 3.

Yours sincerely

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke.

**HON RITA SAFFIOTI MLA
MINISTER FOR PLANNING**

22 MAR 2018

cc: Garry Hunt, Chief Executive Officer, City of Joondalup



Minister for Transport; Planning; Lands

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Hon Albert Jacob JP
Mayor
City of Joondalup
PO Box 21
JOONDALUP WA 6919

Dear Mayor

CITY OF JOONDALUP PROPOSED LOCAL PLANNING SCHEME NO. 3

Following my previous letter of 22 March 2018, I write regarding our subsequent meeting of 5 April 2018 as well as your further letter of 17 April 2018.

As you will recall in our meeting of 5 April, I reiterated my concerns regarding the current request I have to approve LPS 3, while the City of Joondalup is still progressing Amendments 88 & 90 to District Planning Scheme No. 2 (DPS 2).

I welcome your acknowledgement regarding the initiation and timing of Amendments 88 & 90; that new amendments would be required if LPS 3 is approved; and your own view that it would be better that they not be progressed at this time, particularly given that the City's strategic planning framework identifies these areas as Housing Opportunity Areas (HOAs).

I also appreciate your agreement that it is necessary to plan for infill development in the City of Joondalup and at least meet the City's minimum infill targets.

While the five items that you seek clarification on in your letter of 17 April 2018 were all covered in my letter of 22 March 2018 (attached), I can offer the following additional comments.

1. Successive State governments have acknowledged the need to manage the extent of growth on the outer suburbs of Perth. I note your recent acknowledgement that this has been a bipartisan policy. In this respect, this Government remains committed to the minimum 47% infill target that has been supported by successive Governments.
2. State government sets strategic direction through minimum infill targets and by providing guidance through strategic documents, such as the principles set out in *Perth and Peel @3.5 Million*. However, local governments are responsible for the more-detailed identification of areas where infill should be provided.

3. The infill target of 20,670 for the City of Joondalup in the *Perth and Peel @3.5 Million* suite of documents was released in May 2015 and finalised in March 2018. This reflects the bipartisan position in relation to the need for infill development. I note that this 2050 target reflects the need to accommodate population growth between 2031 and 2050, rather than a fundamental shift in planning policy.
4. The City of Joondalup's initiation of ad-hoc amendment proposals has created community expectation that is inconsistent with its own draft LPS3. However, a strategic approach would allow the City of Joondalup to properly assess the relative merits of infill proposals across the City and the way they align with the agreed policy position regarding the provision of infill development.

I do not believe it is wise that the City has two different inconsistent processes running concurrently as this creates confusion and I would like the City to confirm its preference for LPS 3 to proceed. Any refinement of HOAs should be undertaken strategically, while achieving identified infill targets.

5. In line with this Government's commitment to community consultation, it follows that a comprehensive engagement process needs to support the review the City has initiated.

There has been discontent with the City of Joondalup's current approach to planning for infill development. Accordingly, I request that you confirm your preference to proceed with LPS 3 ahead of finalisation of Amendments 88 & 90. This clarification regarding the City's position and allow all parties to move forward with an agreed approach to this matter, as well as other proposals contained in LPS 3.

While I am not pre-empting closer consideration of any proposal, the City should consider a range of options if it seeks to retrospectively limit the construction of multiple dwellings. I am concerned that the possible limitation of multiple dwellings to sites greater than 2,000m² could lead to the haphazard location of multiple dwellings in areas that will be predominately characterised by medium density development. As an example, an approach allowing multiple-dwellings to be built on sites in specific locations (e.g. near train stations), but excluding them from others, may deliver more-cohesive neighbourhood character.

In any event, I encourage consideration of such matters through the planned review of the City's infill planning. A new and thorough community consultation process with residents, including those outside of HOAs, about how infill development can be provided across the City, should support such a review.

Yours sincerely



HON RITA SAFFIOTI MLA
MINISTER FOR PLANNING

08 JUN 2018

cc: Garry Hunt, Chief Executive Officer, City of Joondalup
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