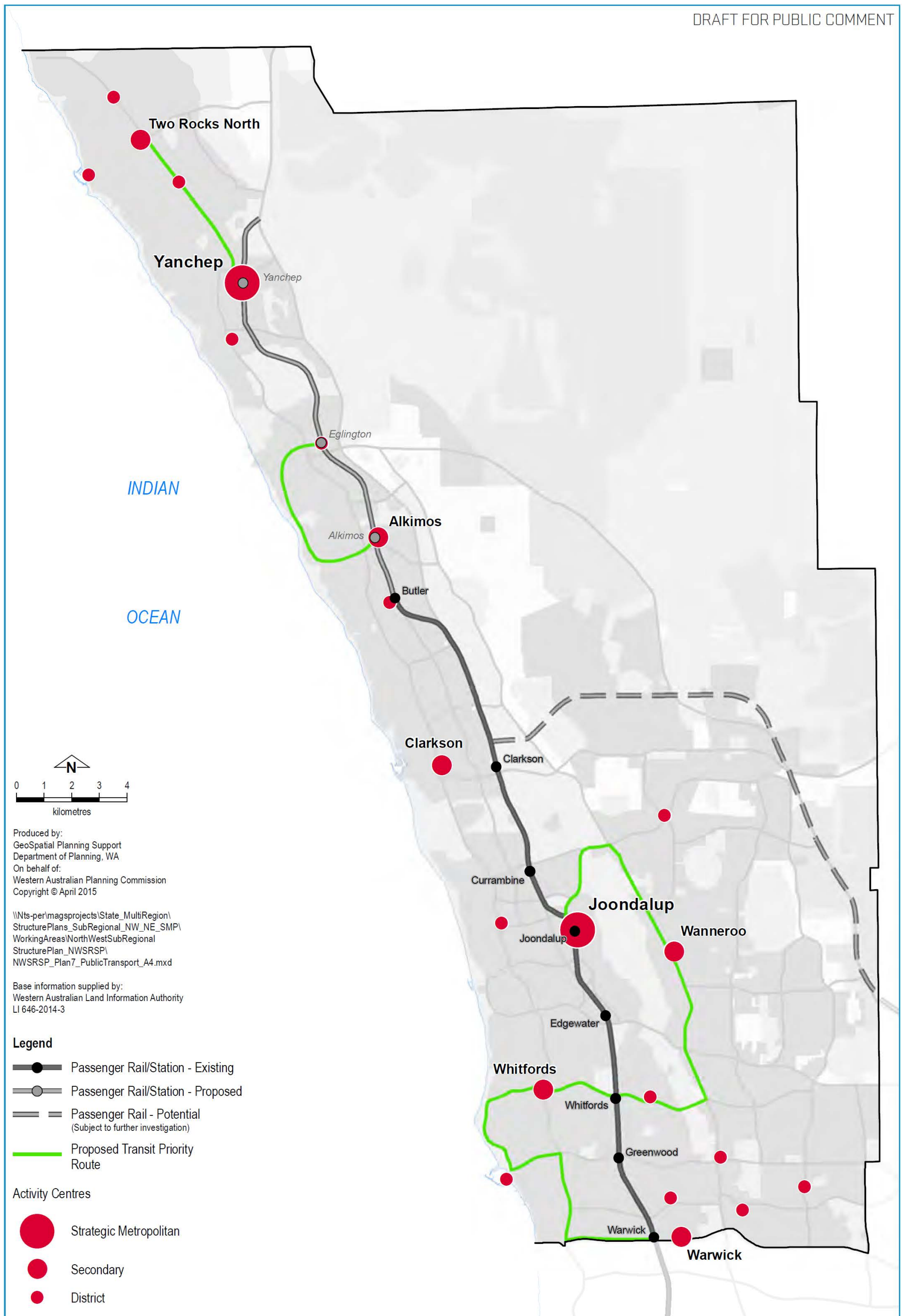


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## **Draft Perth and Peel@3.5million and draft North-West Sub-regional Planning Framework - City of Joondalup Submission**

### **Introduction**

The City of Joondalup (the City) is supportive of the development of a long-term strategy to guide future planning within the Perth and Peel region. The principles and challenges outlined in the draft Perth and Peel at P3.5 million (PP3.5) are generally considered sound and the objectives broadly supported. Furthermore, the draft frameworks will provide some utility in regard to confirmed expansion and consolidation areas.

However, this submission addresses a number of areas that are believed to require further consideration in PP3.5 to enable the development of a more visionary and implementable strategy, particularly for the North-West Sub-Region (NWSR).

The key areas that the City believes require further consideration are:

1. The Need for a Bold Vision and Plan for the North-West Sub-Region
2. Increase Employment Self-Sufficiency in the North-West Sub-Region
3. Focus on growing the Joondalup Activity Centre (JAC)
4. Sub-Regional Tourism Development
5. Improve Sub-Regional Transport Connections
6. Other key recommendations required to address a rapidly growing and changing population

### **The Need for a Bold Vision and Plan for the North-West Sub-Region**

There is some concern that PP3.5 appears to be established on a layering of existing plans and previously developed strategies. While it is acknowledged that regard to current approved plans and strategies is required, this is an opportunity to look beyond the current planning horizon and take a truly visionary approach to the long-term future growth of the Perth and Peel regions.

This includes implementing a plan that adequately positions the sub-regions for the future and responds to disruptive industries and generational changes, while considering the role of each sub-region in the broader Perth and Peel Regions and how they are positioned to respond to national and global changes.

This is particularly important for the NWSR, which is one of the fastest growing residential locations in Australia and is projected to account for more than 75% of the Perth and Peel Regions' growth. This has significant implications on the future planning of the City of Joondalup, with increasing pressure on our regional transport networks, existing infrastructure and natural assets. This is evidenced by the recently released *Infrastructure Australia Audit Report* (2015), which outlines that three of the six worst congested road corridors in Australia by 2031 will be in the NWSR, Mitchell Freeway, Marmion Avenue and Wanneroo Road.

It is therefore evident that we cannot persist with current policies and trajectories. Fortunately, the NWSR has multiple strengths and opportunities, from which it can leverage future benefits in terms of economic, social and environmental sustainability, that the NWSR framework needs to capture.

### **Increase Employment Self Sufficiency**

Increasing the employment self-sufficiency of the NWSB is the key to relieving the challenges outlined above, particularly in regards to congestion. PP3.5 understands that greater self-sufficiency is created through the promotion of decentralised employment centres and its recommended increase in the self-sufficiency target, from the current level of 49%, for the NWSR is fully supported by the City. However, a greater self-sufficiency

target can, and needs to be achieved, by the NWSR than outlined in the framework. Intrinsic to this, is the role of the JAC and its demonstrated ability to provide strategic employment opportunities for the sub-region.

The NWSR framework proposes for the JAC to have a total of 20,181 jobs by 2050, which is only an increase of around 3,000 jobs from current levels (2015). However, as outlined above, the JAC is likely to grow much more rapidly than this projection. Since 2008 it is estimated that employment in the city centre has grown from 13,994 to over 17,000, an average of more than 400 jobs per year.

The City's own commercial needs assessment and employment forecasts also show significantly higher commercial development and employment occurring in the JAC by 2050 and it is estimated that the JAC will likely accommodate a total of 45,000 employees by 2050. While this figure is more than double the estimate set by PP3.5, this intensity is achievable in the timeframe based on historical development rates and will ensure that land is used efficiently in the NWSR.

The NWSR is proposed to have the highest population growth of any sub-region and will continue to have a highly professional labour force. The Framework acknowledges the need to provide jobs that match its labour force. However, it is also recommended that the NWSR framework highlights the long term nature of employment generation activities and focuses on the future labour force and the need to accommodate potential future industries. As such, importance should also be placed on positioning the NWSR to accommodate "jobs of the future" in the achievement of further local economic sustainability. This could be by:

- Elevating the classification of Joondalup in the activity centre hierarchy or by including a Specialised Centre at Joondalup's knowledge precinct, alongside the existing Strategic Metropolitan Centre which covers Joondalup's CBD.
- Promoting tourism in the NWSR by committing to the Ocean Reef Marina Redevelopment and connecting the Joondalup Activity Centre and train station to the coast.
- Improving the transport connections in the NWSR, particularly those linking the population to the JAC.

### **Focus on the Growth of the Joondalup Activity Centre**

There are currently ten designated Strategic Metropolitan Centres in the Perth Metropolitan and Peel Regions and attaining the designation of Primary Centre has become an aspirational target for most of them. In seeking to elevate their position within the activity centre hierarchy, there is already strong competition between centres for investment and large-scale infrastructure projects. This competition will not deliver an equitable distribution of jobs, services and amenity for the regions in the future. To address this, as well as strategically address sub-regional and regional balance of competition, it is recommended that Primary Centres or 'emerging Primary Centres' be designated within PP3.5 and this designation be applied to the JAC. Alternatively, if the JAC is to remain as a Strategic Metropolitan Centre (SMC), then Joondalup's knowledge precinct should also be designated as a Specialised Centre alongside this. This would allow for strategic alignment and focusing of investment and development within the sub-region.

However, regardless of its designation, Joondalup will continue to strengthen as an activity centre through its growing strategic employment and leverage of its unique assembly of regionally significant uses. It is therefore recommended that greater commentary be provided in the NWSR Framework around the JAC's potential and capability to continue to support the region in a primary role into the future.

Joondalup is currently the largest and most established centre in the NWSR. With the provision of existing infrastructure, a major rail transport hub and significant land development and redevelopment opportunities to attract investment and strategic employment, it will continue to grow as the major commercial, civic and cultural focus of the sub-region. As such, it is recommended that the assumptions around employment and the development potential of JAC, as outlined by PP3.5, account for this continued growth, as well as outline specific initiatives and actions to help deliver the employment targets required within the JAC by 2050.

In reference to development within the JAC, the NWSR framework identifies that *"there is little incentive or viability in redeveloping sites in the short-to-medium term."* However, it is considered that the JAC can accommodate a greater number of jobs, floor space and infill development than outlined by the NWSR Framework, as outlined below:

- Preliminary land capacity analysis of the JAC has found that there is approximately 60 ha of vacant land suitable for high intensity infill development. This figure comprises 13.8% of the JAC's total 434 ha area and does not include the significant redevelopment opportunity of areas such as the Winton Road service industrial area or Joondalup Gate.
- The NWSR framework proposes for the JAC to have a total of 20,181 jobs by 2050, which is only an increase of around 3,000 jobs from current levels (2015). However, since 2008 it is estimated that employment in the city centre has grown from 13,994 to over 17,000, an average of more than 400 jobs per year. The JAC will likely accommodate a total of 45,000 employees by 2050.
- The JAC (434 ha) is comparable to the Perth CBD (483 ha) in terms of total area and features an average growth of 25,000m<sup>2</sup> floor space (including commercial, industrial and public purpose survey uses) per annum.

It is also recommended that the NWSR framework highlights the long term nature of employment generation activities and focuses on the future labour force and the need to accommodate potential future industries. The NWSR is proposed to have the highest population growth of any sub-region and will continue to have a highly professional labour force. As such, importance should also be placed on positioning Joondalup to accommodate "jobs of the future" in the achievement of further local economic sustainability.

### **Focus on Sub-Regional Tourism Opportunities**

The NWSR framework identifies that the need to increase employment self-sufficiency and self-containment is a strategic priority for the sub-region. As part of this, it identifies that 'Metropolitan Attractors' (e.g. Hilary's Boat Harbour) can assist by providing localised employment opportunities. This is fully supported by the City and it is recommended that the NWSR framework expands on this by providing more detailed proposals on the potential of the tourism industry as a major employment generator within the sub-region.

As part of this, it is imperative that the NWSR Framework identifies the Ocean Reef Marina as a future tourist centre and key employment node, in accordance with the City's *Local Planning Strategy*. The City holds a vision for the Ocean Reef Marina site as a world class recreational, residential and tourism development that encapsulates high levels of environmental sustainability, community amenity and delivers economic growth and social benefit to the residents of the City of Joondalup and the broader region. The City has signed an Ocean Reef Marina Memorandum of Understanding with the State Government, which is a formal agreement that acknowledges a strategic alliance and the shared commitment of the City and State Government as joint landowners of the site in bringing the Ocean Reef Marina project to fruition.

In addition to Ocean Reef Marina, the sub-region possesses a number of regional attractors including Hillarys Boat Harbour, broader Sunset Coast, Yellagonga Regional Park and Yanchep National Park. These are major attractors for the sub-region and key drivers of the local economy.

### **Improve Sub-Regional Transport Connections**

Historically, development within the NWSR has been Perth-centric, evidenced by the concentration of north-south linkages. However, it is now necessary to strengthen the connections to the main activity centres in the sub-region. As such, the City supports the NWSR framework's aims to improve the integration of land uses and employment with the movement network and to improve movement network challenges such as congestion and increased demand for public transport.

In supporting these aims, the City considers the following transport connections to be of the highest priority:

#### *JAC to Wanneroo Secondary Centre and Neerabup*

A 'proposed transit priority route' is included in the Framework connecting the JAC and the Wanneroo Secondary Centre by-2025. Currently peak hour congestion levels from Joondalup Drive to Wanneroo Road are extremely high. This is projected to worsen in the future, therefore linking Wanneroo Secondary Centre and the East Wanneroo growth area to JAC is considered essential. The connection should also extend north east to the future Neerabup and south Pinjar industrial areas (post-2025).



#### JAC to Wangara and future east Wanneroo

The Framework proposes an upgrade to the Ocean Reef Road – Gnangara Road corridor, to designate it as a Primary Distributor Road classification by-2025. High levels of congestion along this corridor means that the City is supportive of an increase in classification.

To support this increased classification, this corridor must include a transit priority public transport route linking the rapidly growing Wangara industrial area and East Wanneroo residential area to JAC and Edgewater Train Station by-2025. The Principle Shared Path network, usually associated with north - south cycle (Mitchell Freeway) traffic should also be included for major regional roads such as Ocean Reef Road and Gnangara Road. This initiative would provide commuters with an alternative transport mode to the private car.

#### JAC to the Coastline and Ocean Reef Marina

It is essential that a high quality transit priority public transport route connect JAC to the coastline and the future Ocean Reef Marina by-2025. The Ocean Reef Marina is to be developed as a tourism node and key employment generator. This link will improve JAC's relationship with the coast and help to strengthen the east-west movement network. It will also make a strong contribution to employment self-sufficiency through generating localised employment opportunities.

#### JAC to Burns Beach Coastal Node

The bus service to the Burns Beach area needs to be extended in line with the Burns Beach Structure Plan by-2025. If this cannot be achieved, an interim service is to be provided whereby the existing service deviates through the estate. The long-term objective is to provide a transit priority route that efficiently connects Burns Beach with the Currumbine Train Station post-2025.

#### JAC to Whitfords Secondary Centre

A 'proposed transit priority route' is included in the Framework connecting the Whitfords Train Station to Whitfords Secondary Centre and Hillarys Boat Harbour by-2025. Whitfords Avenue currently experiences high levels of congestion. It is considered essential to connect the City's second largest centre to the northern suburbs railway line and Hillarys Boat Harbour by-2025.

### **Additional Recommendations to Address a Rapidly Growing and Changing Population**

Further to the key recommendations above, the City will also be making a number of other key recommendations in its detailed analysis below to address the challenges of a rapidly growing and changing population. These include recommendations relating to Joondalup Health Campus as a full tertiary hospital, further consideration of sustainable infrastructure and changing demographics in PP3.5 and the need for a more detailed whole-of-government implementation strategy.

### **Summary**

The submission recommends that a much greater focus be placed on Joondalup, particularly JAC, over the next 35 years, through investment in commercial development, such as State Government offices and the Ocean Reef Marina; community services to accommodate the growing population and changing demographic; and transport infrastructure to better connect the population of the sub-region to what is the primary centre north of Perth.

In that regard please find below the City's detailed analysis and recommendations.

## Draft Perth and Peel@3.5million and North-West Sub-Regional Planning Framework – Detailed Analysis

Key Consideration	Recommendation(s)	City of Joondalup Comment / Justification
<b>The need for a bold and visionary plan for the North-West Sub-Region.</b>	<ul style="list-style-type: none"> <li>Implement a plan that adequately positions the NWSR for the future (2050) and responds to disruptive industries and generational change.</li> <li>The Framework considers the role of the NWSR in the broader Perth and Peel region and how it is positioned to respond to national and global changes. This should be reflected in the activity centre hierarchy, movement network, economic development and infrastructure provision.</li> </ul>	<p>The draft Perth and Peel @3.5million (PP3.5) strategy appears to be established on a layering of existing plans and strategies previously developed. While regard needs to be given to current plans and regional initiatives, this is an opportunity to look beyond the current planning horizon and take a truly visionary approach to the long-term future growth of the Perth and Peel regions. As a plan to 2050, there is the opportunity to set the precedence for future planning and strategy development.</p> <p>As part of the above such, the City believes that following needs to be considered in PP3.5:</p> <ul style="list-style-type: none"> <li>Along with the consideration of an ageing population, the implications of the resultant shrinking proportion of the working population.</li> <li>Implications of an ageing population and increases in lifestyle related disease on health and aged care provision (and location).</li> <li>Structural change in the retailing sector as a result of online markets and the implications for retailing in activity centres.</li> <li>Collaborative consumption and sharing culture.</li> <li>Digital access and increased demand on teleworking and “anywhere working” and resultant impacts on infrastructure, servicing peaks and commercial development.</li> <li>Labour off-shoring and the resultant impact on traditional employment models and jobs.</li> <li>Increased spending on experiences as opposed to material consumption and the role that cities play in providing arts, culture and entertainment.</li> <li>Climate change and resource management and implications for design of places, spaces and city development.</li> <li>Sustainable and precinct-based infrastructure.</li> </ul>
<b>Limitations of the modeling and methodology</b>	<ul style="list-style-type: none"> <li>Further information be provided throughout the PP3.5 suite of documents to outline the assumptions and limitations of the modeling and</li> </ul>	<p>In order to achieve the above considerations and adequately capture the potential of the NWSR, the scenarios used by the PP3.5 suite of documents need to accurately reflect what can be achieved by the NWSR in the future.</p> <p>Review of the AEC Group’s Economic Development Study (EDS) has found that the modeling used to inform the scenarios, while valid, does not comprehensively respond to future trends and change. It uses a top down methodology and has not adequately considered new information from local authorities such as building approvals</p>

	methodology used.	<p>data. It is therefore limited by information available, including WAPC land use survey data from 2008, which is now seven years old. From review, the model uses a number of assumptions and historical data. This includes a number of “Pull” coefficients (Table.7) that outline a type of gravity weighting for each activity centre type as well as additional weightings for extra elements such as a hospital, university and light rail station. There is no mention of a heavy rail station such as that in the centre of the JAC.</p> <p>Whilst the model is considered by the City’s Economic Development Team as a valid way of distributing likely future jobs for the whole of Perth and Peel to test the overall plausibility of the employment outcome, there are a number of assumptions made (as with any model), that limit the output to only one scenario. It is therefore recommended that further information is provided throughout the PP3.5 suite of documents to outline the assumptions and limitations of the modeling as shown in the EDS on page 8, as well as some of the methodology such as the “Pull” coefficients.</p>
<b>Increase Employment self sufficiency in the NWSR and focus on ‘jobs of the future’</b>	<ul style="list-style-type: none"> <li>• A greater self-sufficiency target be provided for the Sub-Region.</li> <li>• That the NWSR framework highlights the long term nature of employment generation activities and focuses on the future labour force and the need to accommodate potential future industries.</li> <li>• Emphasise providing the right environments to strategically position activity centres to attract appropriate knowledge workers for future and emerging industries, to facilitate diversified and productive economic growth.</li> </ul>	<p>Increasing the employment self-sufficiency of the NWSB is the key to relieving challenges such as population growth and congestion. PP3.5 understands that greater self-sufficiency is created through the promotion of decentralised employment centres and its recommended increase in the self-sufficiency target for the NWSR, from the current level of 49.2%, is fully supported by the City. However, a greater self-sufficiency target than what is outlined in the NWSR Framework can, and needs to be, achieved by the NWSR. Intrinsic to this, is the role of the JAC and its demonstrated ability to provide strategic employment opportunities for the sub-region.</p> <p>The NWSR Framework acknowledges the need to provide jobs that match its labour force. However, the population and labour force are projected to increase by almost 130% by 2050 (Table 2.1, page 60). Therefore, it is also recommended that the NWSR framework highlights the long term nature of employment generation activities and focuses on the future labour force and the need to accommodate potential future industries.</p> <p>Based on a social trends analysis, the focus needs to be on attracting the future labour force. As part of this, importance should be placed on positioning Joondalup to accommodate “jobs of the future” (CSIRO Megatrends report). Potential future industries for employment include:</p> <ul style="list-style-type: none"> <li>• Health Care;</li> <li>• Fitness and Sport;</li> <li>• Digital;</li> <li>• Education; and</li> <li>• Culture and entertainment – experiential versus consumptive.</li> </ul> <p>The NWSR Framework acknowledges that to improve employment self-sufficiency the NWSR needs to provide jobs that match its labour force. However, there is also a need to respond to the generational shift in jobs and labour. It is recommended that PP3.5 also emphasises providing the right environments to strategically position activity</p>



	<ul style="list-style-type: none"> <li>• Section 3.3 (page 22) of the Framework be amended to provide comment on the need to attract “jobs of the future”.</li> <li>• Section 3.3 (page 24) be amended to provide commentary on the unique offering and mix of land uses within the JAC that are suitable to improve employment self-sufficiency.</li> </ul>	<p>centres to attract appropriate knowledge workers for future and emerging industries that will also facilitate diversified and productive economic growth.</p> <p>People are more likely to choose where to live based on a range of factors including amenity, proximity to education, health and employment opportunities. By planning for and attracting more strategic industry types, the NWSR will transition from a reliance on population based employment to attracting a labour force driven by strategic employment opportunities.</p> <p>As part of this, it is recommended that the NWSR framework emphasises the opportunity to leverage off the existing unique offering of Joondalup, which already possesses a number of major institutions which are tailored to providing “jobs of the future” such as Edith Cowan University, West Coast Institute (Education), Joondalup Health Campus (Health Care) and HBF Arena (Fitness and Sport). Focusing on the next stage of Joondalup’s development would encourage and attract larger corporate institutions and government organisations to select activity centres.</p>
<b>Focus on the future growth potential of the JAC and its primacy in the NWSR</b>	<ul style="list-style-type: none"> <li>• Greater commentary around the JAC’s potential and capability to continue to support the region in a primary role into the future.</li> <li>• Recognise that the JAC can accommodate 45,000 employees by 2050.</li> <li>• Strategically address sub-regional and regional balance of competition by designating Primary Centres or ‘emerging Primary Centre’ within PP3.5.</li> <li>• Apply the ‘Primary Centre’ or ‘Emerging Primary Centre’ designation to the</li> </ul>	<p>The NWSR is one of the fastest growing residential locations in Australia and is projected to account for more than 75% of the Perth and Peel regions’ growth. PP3.5 provides a projected population growth from 322,486 (2011) to 740,300 (2050) between 2011 and 2050. This represents a growth rate of 129.6% (3.3% per annum).</p> <p>The JAC is currently the most significant SMC in the NWSR, and is positioning itself to develop into a Primary Centre. It will continue to grow and develop as the principle centre for the NWSR into the future, providing the primary location for commercial, retail, higher-density housing, entertainment, tourism, civic/community, higher education and medical services for the catchment that incorporates the majority of the NWSR.</p> <p>The City recognises the future role of Yanchep as a SMC and the opportunity for Yanchep to provide additional services for the sub-region. However, this is a long-term proposal and will take time to establish (Joondalup was developed 30 years ago), in which time Joondalup will continue to strengthen itself as an activity centre through strategic employment and leverage of its unique assembly of regionally significant uses.</p> <p><b>Growth of the Joondalup Activity Centre</b></p> <p>The NWSR Framework sets out proposals to “strengthen key activity centres and employment nodes to meet the future needs of industry, commerce and the community”.</p> <p>The JAC contains all of the elements required to develop as the preeminent centre for the NWSR. The JAC is entering into its next iteration of development with a strong focus on increasing residential and employment density, diversifying its employment offering and strengthening the physical and functional linkages between its key</p>

JAC.

• If the JAC is to remain as a Strategic Metropolitan Centre, then Joondalup’s knowledge precinct should be designated as a Specialised Centre alongside this to allow for strategic alignment and focusing of investment and development within the sub-region.

knowledge, health, recreational and cultural assets.

As a principle SMC, the JAC should be a focus for the NWSR and the NWSR Framework should seek to promote its continued growth and development. Whilst the NWSR Framework acknowledges Joondalup’s role as a SMC, there needs to be greater commentary around its potential and capability to continue to support the region in a primary role into the future.

**Population Growth/Service Catchment**

It is outlined in SPP 4.2 and the NWSR Framework that SMCs serve populations of up to 300,000 people. The release of the Department of Planning’s *WA Tomorrow* population forecasts provides representation of the best estimates for Western Australia’s population growth. Figure 4 (page 19) of the NWSR Framework outlines the conceptual urban structure and catchments for the Joondalup and Yanchep Activity Centres.

To determine the projected regional catchment for the JAC, current *WA Tomorrow* population forecasts (2015) for Australian Bureau of Statistics (ABS) Statistical Area Level 2’s (SA2’s) have been used. The median forecast or Band C of the forecasts was used and the analysis found that the JAC is projected to service a regional catchment of approximately 384,980 by 2026, which is well above the trade area of a SMC. This does not factor in the projected population increases that are expected in the NWSR post 2026, therefore it is expected that this catchment is likely to grow even further.

The Framework identifies an urban infill dwelling target of 48,591 (housing an estimated 106,900 people) for the NWSR by 2050. The Central Sub-Regional Planning Framework (CSRF) outlines ten principles of Urban Consolidation, which determine the preferred locations for infill development. The principles identify activity centres and station precincts as optimal locations for infill development. Therefore, it is likely that future infill development within the NWSR will occur in activity centres and station precincts located in the region.

Figure 4 (page 19) of the NWSR Framework identifies the potential catchment for the Joondalup SMC. Table 2 identifies the activity centres and station precincts which are located within this conceptual catchment:

*Table 1: Activity Centres and Station Precincts*

Hierarchy Classification	Activity Centres		Station Precincts
Secondary	Clarkson Wanneroo	Warwick Whitfords	Clarkson Currambine
District	Alexander Heights Currambine Girrawheen	Madeley Neerabup Sorrento	Edgewater Greenwood Warwick

Additionally, Plan 2 (page 21) of the NWSR Framework demonstrates that major urban undeveloped and urban expansion areas such as Banksia Grove, Burns Beach, Carramar, East Landsdale, East Wanneroo, Kinross, Iluka and Tamala Park are located within the SMC's catchment, demonstrating that much of the NWSR's anticipated development (excluding the centres of Alkimos, Yanchep and Two Rocks) will also occur within the JAC catchment.

### **Employment**

The City has a goal of achieving 45,000 jobs in the JAC by 2050, which aligns with the 1992 *North West Corridor Structure Plan*. The target of 45,000 jobs represents an increase of approximately 28,000 jobs from the existing employment numbers (approximately 17,000) over 35 years (2015-2050). These figures are much higher than what is anticipated in the NWSR Framework (20,181 total jobs, representing an increase of only 5,998 jobs over a 39 year horizon from 2011-2050).

The City's *Economic Development Strategy* identifies the need to improve employment self-containment and self-sufficiency through "*encouraging, attracting and retaining a creative, talented and skilled workforce*". As such, along with the current quantum of jobs already offered within the JAC, there is significant potential for Joondalup to accommodate greater future employment opportunities.

### **City Centre Size and Available Floorspace**

The JAC (434 ha) is comparable to the Perth CBD (483 ha) in terms of total area. At the time of the 2007/8 WAPC Land Use Survey, the JAC contained 13,994 employees and almost 783,000m<sup>2</sup> of floorspace (including commercial, industrial and public purpose survey uses). This growth to 2008 occurred over the 31 years since the inception of Joondalup in 1977, or an average of 25,000m<sup>2</sup> per annum.

The 2008 floorspace and land area gives an approximate intensity of 1,800m<sup>2</sup> per hectare. In the same 2008 survey, the Perth CBD area as identified above had 86,480 employees and 3,030,000m<sup>2</sup> of commercial floorspace, resulting in an intensity of around 6,270m<sup>2</sup> per hectare.

Whilst it is considered unlikely that this level of intensity will be achieved in Joondalup by 2050 (73 years from inception of Joondalup in 1977), particularly with the proposed growth trajectory of Perth and Peel, the JAC can accommodate 45,000 employees at an intensity of about 3,600m<sup>2</sup> per hectare (assuming an average 34.9m<sup>2</sup> floorspace per employee). This intensity is achievable in the timeframe based on historical development rates and will ensure that land is efficiently used in the sub-region.

In terms of non-residential building approvals in the City of Joondalup since the last WAPC Land Use Survey in 2008, almost \$1.2 billion in building approvals has occurred between 2008 and April 2015 (ABS Building Approvals,

Cat 8731.0). Even if a relatively high figure of \$6,000 per square metre is used, this equates to an additional 200,000m<sup>2</sup> of floorspace approved since 2008. These approvals would include the significant developments at the Joondalup Health Campus, ECU and Lakeside Shopping Centre. An additional 200,000 m<sup>2</sup> over seven years equates to an average of over 28,000m<sup>2</sup> per annum, indicating that the development rate is not slowing.

#### **City of Joondalup Dwelling and Infill Targets**

The City of Joondalup has a greater land capacity or development potential than outlined in the NWSR Framework. There are a number of 'urban undeveloped' sites within the JAC that provide significant infill opportunities. There are also a number of landholdings that offer significant re/development potential. Table 4 provides an overview of the sites suitable for infill development in the JAC.

*Table 2: JAC Infill Development Land Capacity*

Urban Undeveloped Sites	Area (ha)	% of JAC
Edgewater Quarry	16.02	7.3%
DoH Site	9.68	
LandCorp Site (Grand Boulevard)	6.08	
<b>Total</b>	<b>31.78</b>	
Infill Development	Area (ha)	% of JAC
ECU Site	7.90	6.5%
West Coast Institute	5.47	
Lend Lease Car Park	5.07	
Edgewater Station Car Park	2.88	
Old Bunnings Site	2.68	
Basketball Stadium	1.79	
Boas Square Redevelopment	1.42	
Lot 6 Lawley Court	0.75	
Lot 505 Collier Pass	0.3	
<b>Total</b>	<b>28.26</b>	

As demonstrated in Table 4 there are approximately 60 ha of land suitable for infill development currently located in the JAC. This figure comprises 13.8% of the JAC's total 434 ha site.

Table 1.1 (page 58) of the NWSR Framework indicates that the City is to provide a total of 22,632 additional dwellings between 2011 and 2050. Table 1.4 (page 59) proposes that the City has an infill dwelling target of 20,669 between 2011 and 2050. This suggests that of the City's total projected dwelling target (22,632) 1,963 will be greenfield developments, whilst the remaining 20,669 will be provided through urban infill.

An analysis of the JAC's land capacity found that there is currently 31.78 ha of 'urban undeveloped' land suitable for development. By applying the desired residential density target for SMCs as outlined in SPP4.2 (30-45 dwellings p/ha) it was found that approximately 1,430 greenfield dwellings (nearly the entire projected target) could be provided in the JAC alone. It must also be taken into account that these dwelling numbers are minimums, and do not take into account currently approved developments. There are also no height restrictions within the JAC. As such, the density and total number of dwellings are likely to be much higher.

***Primacy in the Sub-Region***

*"Primary centres are critical to achieving long-term sub-regional employment objectives. They should house major institutions and become the preferred location for investment in high order public and employment generating infrastructure outside the central metropolitan sub-region" (Directions 2031, 2010).*

There are currently ten designated Strategic Metropolitan Centres in the Perth Metropolitan and Peel Regions and attaining the designation of Primary Centre has become an aspirational target for most of them. In seeking to elevate their position within the activity centre hierarchy, there is already strong competition between centres for investment and large-scale infrastructure projects. This competition will not deliver an equitable distribution of jobs, services and amenity for the regions in the future. To address this, as well as strategically address sub-regional and regional balance of competition, it is recommended that Primary Centres or 'emerging Primary Centres' be designated within PP3.5. This would allow for strategic alignment and focusing of investment and development within the sub-region.

Joondalup is well-positioned in establishing itself as a future Primary Centre. The JAC's is strategically located in the north-west growth corridor with direct access to the Mitchell Freeway, a number of regional roads and an extensive public transport network serviced by two train stations (Joondalup and Edgewater) and a regional bus station. It contains major institutions such as Edith Cowan University, the Joondalup Health Campus and West Coast Institute as well as Lakeside Joondalup.

A Primary Centre designation or statement of primacy would encourage and attract larger corporate institutions and government organisations to select activity centres. A targeted approach to investment attraction is required, in order to provide higher skilled employment opportunities and attract significant employers. As Joondalup is the largest and most established centre in the region it has significant potential as a catalyst for investment attraction in the NWSR.

	<p>Alternatively, if the JAC is to remain as a Strategic Metropolitan Centre, then Joondalup's knowledge precinct should also be designated as a Specialised Centre alongside this. This would allow for strategic alignment and focusing of investment and development within the sub-region.</p> <p><b>Parramatta Case Study:</b></p> <p>Greater Parramatta is identified as Sydney's western CBD and is located approximately 26km from the Sydney CBD (Joondalup is 28km from Perth). It was revealed in the NSW Planning and Environment document, <i>A plan for a Growing Sydney (2014)</i>, that at the 2011 Census employees in Greater Parramatta with a bachelor or higher degree increased by almost 26% (11% 2006-2011). This was a direct result of targeted investment, which led to diversification of the economy and growth in knowledge industries and increasing numbers of more highly qualified people working in Parramatta. The plan endeavours to facilitate sustained growth for the Parramatta CBD and acknowledges that it will require a critical mass of investment and greater diversity of activities.</p> <p>It is recommended that a similar approach be taken with the JAC to promote employment growth and diversity, as it is an established centre and already possesses a diversity of land uses. It is therefore recommended that Joondalup be considered as a Primary Centre or 'emerging Primary Centre' in the Framework. This will help facilitate the targeted investment of corporate institutions and government agencies as well as provide private investors with a level of certainty they do not currently have.</p>
<p><b>Focus on sub-regional tourism opportunities, in particular the Ocean Reef Marina</b></p>	<ul style="list-style-type: none"> <li>• The NWSR framework expands on the need to increase employment self-sufficiency and self-containment by providing detailed proposals on the potential of the tourism industry as a major employment generator within the sub-region.</li> <li>• Ocean Reef Marina is identified as a major regional attractor, future tourist centre and key employment node in Section 3.3 (page 27).</li> </ul> <p>Section 3.3 (page 22) of the Framework details the NWSR's needs with regard to economy and employment, and identifies that the need to increase employment self-sufficiency and self-containment is a strategic priority for the Sub-Region. As part of this, it identifies that 'Metropolitan Attractors' (e.g. Hilary's Boat Harbour) can assist by providing localised employment opportunities. This is fully supported by the City and it is recommended that the NWSR framework expands on this by providing more detailed proposals on the potential of the tourism industry as a major employment generator within the sub-region. This will highlight the potential for the NWSR to become a destination of choice in the Perth Metropolitan Area.</p> <p>The tourism sector presents a significant opportunity for job creation and regional/national/international tourism. The NWSR possesses 48km of coastline and beaches. In addition to the Sunset Coast, the City of Joondalup possesses a number of other regional attractors including Hilary's Boat Harbour, Ocean Reef Marina (major infrastructure development) and Yellagonga Regional Park. These are major attractors for the City and key drivers of the local economy. Approximately one third of local jobs are related to the tourism industry or 'visitor economy'.</p> <p>As part of this, it is imperative that the NWSR Framework identifies the Ocean Reef Marina as a future tourist centre and key employment node, in accordance with the City's <i>Local Planning Strategy</i>. The City holds a vision for the Ocean Reef Marina site as a world class recreational, residential and tourism development that encapsulates high</p>



	<ul style="list-style-type: none"> <li>• Identification of major regional attractors as 'localised employment nodes' on Plan 1 (page 17) of the Framework.</li> <li>• Amendment made to Section 3.3 to reference and address the potential of the tourism industry as a key employment opportunity.</li> </ul>	<p>levels of environmental sustainability, community amenity and delivers economic growth and social benefit to the residents of the City of Joondalup and the broader region. The City has signed an Ocean Reef Marina Memorandum of Understanding with the State Government, which is a formal agreement that acknowledges a strategic alliance and the shared commitment of the City and State Government as joint landowners of the site in bringing the Ocean Reef Marina project to fruition.</p>
<p><b>Improve sub-regional transport connections, with a focus on improving east-west linkages</b></p>	<ul style="list-style-type: none"> <li>• Link Wanneroo Secondary Centre and the East Wanneroo growth area to the JAC via a 'proposed transit priority route' by-2025.</li> <li>• Upgrade the Ocean Reef Road – Gnangara Road corridor to a Primary Distributor Road classification by-2025 and include a transit priority public transport route in this corridor.</li> <li>• A high quality transit priority public transport route to connect the JAC to the coastline and the</li> </ul>	<p>Historically, development within the NWSR has been Perth-centric, evidenced by the concentration of north-south linkages. However, it is now necessary to strengthen the connections to the main activity centres in the sub-region. As such, the City supports the NWSR framework's aim to improve the integration of land uses and employment with the movement network and to improve movement network challenges such as congestion and increased demand for public transport.</p> <p>The City understands the importance of connecting to Yanchep in the long-term, this is reflected in Table 3 of the Framework (page 34), which states that a passenger rail connection to Yanchep is likely to be completed post-2025.</p> <p>In the interim, it is important to ensure that public transport services are continually improved and upgrades are made to the sub-regional movement network. There are a number of short to medium-term improvements which can be made, particularly to the east-west movement network. These improvements will optimise linkages between activity centres and facilitate land use-transport integration, which aligns with the Urban Consolidation principles outlined in the CSRF.</p> <p>The City considers the following transport connections to be of the highest priority:</p> <p><b><i>JAC to Wanneroo Secondary Centre and Neerabup</i></b></p> <p>A 'proposed transit priority route' is included in the NWSR Framework connecting the JAC and the Wanneroo Secondary Centre by-2025. Currently peak hour congestion levels from Joondalup Drive to Wanneroo Road are extremely high. This is projected to worsen in the future, therefore linking Wanneroo Secondary Centre and the East Wanneroo growth area to JAC is considered essential. The connection should also extend north east to the future Neerabup and south Pinjar industrial areas (post-2025).</p>

	<p>future Ocean Reef Marina by-2025.</p> <ul style="list-style-type: none"> <li>• Extend the bus service to the Burns Beach area in line with the <i>Burns Beach Structure Plan</i> by-2025.</li> </ul>	<p><b><i>JAC to Wangara and future east Wanneroo</i></b></p> <p>The Framework proposes an upgrade to the Ocean Reef Road – Gngara Road corridor, to designate it as a Primary Distributor Road classification by-2025. High levels of congestion along this corridor means that the City is supportive of an increase in classification.</p> <p>To support this increased classification, this corridor must include a transit priority public transport route linking the rapidly growing Wangara industrial area and East Wanneroo residential area to the JAC and Edgewater Train Station by-2025. The Principle Shared Path network, usually associated with north - south cycle (Mitchell Freeway) traffic should also be included for major regional roads such as Ocean Reef Road and Gngara Road. This initiative would provide commuters with an alternative transport mode to the private car.</p> <p><b><i>JAC to the Coastline and Ocean Reef Marina</i></b></p> <p>It is essential that a high quality transit priority public transport route connect the JAC to the coastline and the future Ocean Reef Marina by-2025. The Ocean Reef Marina is to be developed as a tourism node and key employment generator. This link will improve the JAC's relationship with the coast and help to strengthen the east-west movement network. It will also make a strong contribution to employment self-sufficiency through generating localised employment opportunities.</p> <p><b><i>JAC to Burns Beach Coastal Node</i></b></p> <p>The bus service to the Burns Beach area needs to be extended in line with the Burns Beach Structure Plan by-2025. If this cannot be achieved, an interim service is to be provided whereby the existing service deviates through the estate. The long-term objective is to provide a transit priority route that efficiently connects Burns Beach with the Currambine Train Station post-2025.</p> <p><b><i>JAC to Whitfords Secondary Centre</i></b></p> <p>A 'proposed transit priority route' is included in the Framework connecting the Whitfords Train Station to Whitfords Secondary Centre and Hillarys Boat Harbour by-2025. Whitfords Avenue currently experiences high levels of congestion. It is considered essential to connect the City's second largest centre to the northern suburbs railway line and Hillarys Boat Harbour by-2025.</p>
<p><b>Further key transport connections to accommodate a rapidly growing and</b></p>	<ul style="list-style-type: none"> <li>• Early planning of the alignment for the second rail option, with it reflected within the MRS reservation as soon as possible to guide future land use</li> </ul>	<p>While the above transport connections are considered a priority for the NWSR, it is acknowledged that there are longer term transport requirements that also need to be fulfilled to alleviate congestions issues and accommodate a growing population. These are outlined below:</p> <p><b><i>Improve the timing of the Butler – Yanchep Rail Link</i></b></p> <p>The proposed second rail option shown in PP3.5 linking the NESR with the CSR is considered an important initiative.</p>

<p><b>changing population</b></p>	<p>planning.</p> <ul style="list-style-type: none"> <li>• The utilisation of shared infrastructure corridors to avoid environmental attributes in lieu of a standalone rail system.</li> <li>• The second rail option originating from either the Joondalup or Edgewater Station.</li> <li>• The timing of the rail extension brought forward to alleviate the rapid expansion of the corridor and the significant risk of severe traffic congestion.</li> <li>• The NWSR Framework place a greater emphasis on the provision of public transport.</li> <li>• Further transport initiatives be explored to encourage public transport usage at the earlier stages of land development, such as the Alkimos - Eglinton proposed Transit Priority Route.</li> </ul>	<p>As highlighted within the NWSR Framework, the anticipated timing for the second rail option is stated as post 2031. It is acknowledged that this route is subject to further refinement by the Department of Transport and the Public Transport Authority. However, it is recommended that early planning of the alignment for the second rail option should be progressed as a priority and reflected within the MRS reservation as soon as possible to guide future land use planning. The utilisation of shared infrastructure corridors to avoid environmental attributes is also preferred in lieu of a standalone rail system.</p> <p>The proposed station for the second rail option is shown north of Clarkson on Plan 7 (page 36). Ideally, the City believes that this rail link should originate from either the Joondalup or Edgewater Station for the following reasons:</p> <ul style="list-style-type: none"> <li>• The Strategic location of the JAC would provide viable access options for commuters both north and south of Joondalup when travelling east thereby reducing commuter demand for Perth CBD.</li> <li>• Establishing a new station further north is unlikely to relieve congestion within Joondalup.</li> <li>• A route originating from Clarkson does not present the most direct route to the east. As a result travel times will appear greater, increasing the likelihood that people will continue to drive.</li> <li>• Joondalup is currently a well-established public transport hub that services the surrounding catchment with a combination of cultural, civic, commercial and residential facilities. On this basis, Joondalup is considered an attractive location for a major east west rail link.</li> </ul> <p>The anticipated timing for the extension of the railway from Butler to Alkimos, Eglinton and Yanchep is stated as post-2025. The rail network is critical to the NWSRs development and provides transport mode choice for commuters. The City, therefore, recommends that the timing of the rail extension should be reconsidered and brought forward given the rapid expansion of the corridor and the significant risk of severe traffic congestion on major north - south links.</p> <p><b><i>Investigate Additional Public Transport Initiatives</i></b></p> <p>The City fully supports the NWSR Framework's aim to improve the integration of land use and the movement network to take advantage of employment opportunities, and therefore improve the sub-region's movement network challenges. It is recommended though, that the NWSR Framework places a greater emphasis on the provision of public transport.</p> <p>A car-centric strategic approach to transport planning resolves congestion issues in the short term. However, in the longer term it is necessary to adopt public and alternative transport modes. Larger cities around the globe are known to have adopted integrated transport strategies to resolve traffic congestion.</p> <p>At a predicted population increase to 3.5million, similar sized states in Australia have faced substantial congestion</p>
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		<p>issues and as a counter-measure, have adopted an integrated approach to transport with the introduction of appropriate mode shifts.</p> <p>Further to the above, the <i>Infrastructure Australia Audit Report</i> (2015) found that if current trends continue, congestion levels in the NWSR will be unsustainable if measures are not implemented in the short-medium term. Three of the roads found in the NWSR were in the top six nationally for cost by congestion. It is therefore imperative that PP3.5 addresses the issue and improves public transport throughout the Perth and Peel regions as a whole.</p> <p>It is therefore recommended that the timing for Butler – Yanchep rail link be made prior to 2025 to encourage public transport usage and influence good habits and trends in the early stages of the development, thereby mitigating the risk of severe traffic congestion on north – south major links in the medium to long term.</p> <p>It is also recommended that further transport initiatives be explored that would encourage public transport usage at the earlier stages of land development. A good example of this being the Alkimos - Eglington proposed Transit Priority Route which will service a significant walkable catchment when implemented.</p>
<p><b>Joondalup Health Campus to become a Tertiary Hospital</b></p>	<ul style="list-style-type: none"> <li>• Joondalup Health Campus be upgraded to a full tertiary hospital.</li> <li>• The future medical facility proposed for Yanchep to be an independent regional hospital, rather than a satellite service to the Joondalup Health Campus.</li> </ul>	<p>The City endorses the NWSR Framework’s acknowledgement that the Joondalup Health Campus will continue to be the key regional health facility within the NWSR.</p> <p>Section 3.4 (page 28) of the NWSR Framework identifies that <i>“increased population will result in increased demand for regional health facilities, the preference will be to redevelop or better utilise existing health sites and facilities instead of developing new regional health facilities within the sub-region”</i>.</p> <p>An ageing population is likely to require improved access to medical and healthcare facilities as future demand dictates. Advances in medical sciences and healthcare means people will continue to live longer in the future. The ageing population and lifestyle related illnesses (e.g. cancer and cardiovascular diseases) are key drivers of growing healthcare expenditure (CSIRO, 2012). The City acknowledged that this is reflected in PP3.5 through the projected increase in healthcare and social assistance jobs. However, it is also recommended that the NWSR Framework identifies the potential of Joondalup Health Campus to be upgraded to a full tertiary hospital, to further meet the needs of a growing population and changing demographics.</p> <p>The NWSR Framework identifies the need to better utilise existing facilities. The Joondalup Health Campus is currently the primary regional health facility in the region and upgrading the facility will facilitate employment generation and improve employment self-sufficiency and self-containment for the sub-region.</p> <p>Further to this, population increase in the sub-region and an ageing population will result in an increase in the</p>

		<p>demand for medical treatment and healthcare services. As such, it is recommended that the future medical facility proposed for Yanchep should be an independent regional hospital, rather than a satellite service to the Joondalup Health Campus.</p>
<p><b><i>The impact of changing demographics</i></b></p>	<ul style="list-style-type: none"> <li>• The implications of an ageing population and the need to cater for a changing demographic for the Perth and Peel Regions be explored further in the suite of documents.</li> <li>• PP3.5 incorporates an overarching objective for all the frameworks that highlights the changing demographics and ageing population, and how this will be reflected in the urban environment</li> </ul>	<p>PP3.5 acknowledges that Western Australia’s population is ageing, and that jobs in healthcare and social assistance is projected to increase. However, it is recommended that the implications of an ageing population and the need to cater for a changing demographic for the Perth and Peel Regions be explored further in the suite of documents. This may include providing further statistics on the projected age profile and relevant demographic information.</p> <p>It is also recommended that PP3.5 incorporates an overarching objective for all the frameworks that highlights the changing demographics and ageing population, and how this will be reflected in the urban environment.</p>
<p><b><i>The importance of sustainable infrastructure</i></b></p>	<ul style="list-style-type: none"> <li>• Sustainability Infrastructure be considered as one of PP3.5’s overarching objectives to ensure that the PP3.5 suite is responsive to climate change. Mitigation and management strategies need to be outlined as part of this process.</li> </ul>	<p>Section 9 – Implementation of PP3.5 (page 65 and 66) identifies key strategies surrounding a ‘Sustainable City’. This section provides sound high-level aspirations and actions. However, it is recommended that a greater explanation be provided on how these will be implemented. This could include consideration of sustainability infrastructure, such as solar, green buildings and water harvesting etc. in the NWSR Framework. This will move the focus away from trunk infrastructure to alternative provisions.</p> <p>Therefore, it is recommended that Sustainability Infrastructure be considered as one of PP3.5’s overarching objectives to ensure that the PP3.5 suite is responsive to climate change. Mitigation and management strategies should also be outlined as part of this process to further support the statement in PP3.5 (page 4) that in 2050 Perth will be a ‘Sustainable City’.</p> <p><i>“Perth will responsibly manage its ecological footprint and live within its environmental constraints, improving our connection with and enjoyment of the natural environment”.</i></p>
<p><b><i>A detailed whole-of-government</i></b></p>	<ul style="list-style-type: none"> <li>• A more detailed whole-of-government</li> </ul>	<p>The implementation sections of both PP3.5 and the NWSR Framework are underpinned by broad-high level actions and proposals.</p>

<b>implementation strategy</b>	<p>implementation strategy be prepared either as part of the PP3.5 suite of documents or as an individual entity.</p> <p>If the key objectives of the strategy are to be met, particularly large-scale, high-quality transit-oriented development, and improved employment self-sufficiency in the NWSR, a detailed whole-of-government implementation strategy is required. This strategy needs to include the proposed timing and sourcing of the funding required to enable incorporation into government/agency forward planning and budgeting. This provides the level of commitment and certainty required to stimulate the high level of industry investment needed for successful development of the major activity centres in the region, and the level and type of development needed along key public transport routes.</p> <p>Such an integrated whole-of-government approach should also involve a more consistent approach across agencies in the forecasts/projections and targets they use in modeling.</p> <p>The type of whole-of-government approach described above will mean a much greater role to be acknowledged by State Government, with further actions assigned to the State Government in the NWSR Framework.</p>
<b>Airport in the North</b>	<ul style="list-style-type: none"> <li>Perth's second international airport be provided at Gingin.</li> </ul> <p>The City is supportive of the need to improve general and civil aviation facilities within the Perth and Peel regions. This is particularly important in the NW and NE sub-regions which are expected to experience significant increases in population and industrial expansion.</p> <p>As the northern sub-regions are not currently serviced by aviation facilities, the City is supportive of providing Perth's second airport at Gingin. However, there also needs to appropriate long term transportation connections planned in conjunction with the second airport location. In particular the second airport needs to link directly to the JAC in terms of both road and high frequency public transport.</p>
<b>Clarity around regional development positioning</b>	<ul style="list-style-type: none"> <li>The Joondalup and Rockingham Activity Centres be upgraded to Primary Centre status.</li> </ul> <p>The WAPC's <i>Directions 2031</i> developed a hierarchy of activity centres which define the functional differences of and distribution of centres. The hierarchy helps to provide a more balanced distribution of housing, population and employment across the Perth and Peel region.</p> <p>It is recognised in <i>Directions 2031</i> that there is a need for a Primary Centre tier in the activity centres hierarchy. Primary Centres are critical to achieving long-term sub-regional objectives (<i>Directions 2031</i>, 2010). It is acknowledged in the overarching <i>State Planning Policy – Activity Centres for Perth and Peel (SPP 4.2)</i> that while no centres currently perform the Primary Centre function, it is likely that some of the Strategic Metropolitan Centres (SMCs) will develop and justifiably emerge as Primacy Centres in the future.</p> <p>As such, it is recommended that the catchment of an activity centre should designate the primacy of its role. The Joondalup catchment services the majority of the Joondalup Local Government Area (LGA) and extends beyond i.e. a significant proportion of the City of Wanneroo is within the JAC catchment.</p>



		<p>The same issue is likely to arise in South Metropolitan Peel (SMP). The sub-region is divided into three sectors western (Rockingham SMC), eastern (Armadale SMC) and Peel (Mandurah SMC). Each sector contains a major activity centre. It is recommended that of the three major SMP centres that Rockingham be upgraded to a Primary Centre. The justification behind this is that the western sector is projected to be the most populous, provide the most jobs and have the highest levels of employment self-sufficiency within the SMP region.</p>
<p><b><i>Relationship to the Strategic Assessment of the Perth and Peel Regions</i></b></p>	<ul style="list-style-type: none"> <li>Local Government be given a greater degree of involvement in the SAPPR process.</li> </ul>	<p>It is imperative that the strategic planning proposals arising from this suite of strategies and the outcomes of the Strategic Assessment of the Perth and Peel Regions (SAPPR) are integrated and that they do not in conflict with each other.</p> <p>The need for a close relationship between the PP3.5 suite of documents and the SAPPR study is recognised and supported. However, there is currently no information available as to exactly how SAPPR is informing the current draft strategies.</p> <p>Additionally, SAPPR is still very much a work-in-progress, with the draft of the SAPPR proposals expected to be released for comment around the end of this year. It remains to be seen how similar the draft SAPPR proposals will be to the information which is currently informing the draft PP3.5 suite.</p> <p>The final Perth-Peel strategies are proposed to be released around the same time as the draft SAPPR proposals are released for comment. It is expected to take at least a year or so for the SAPPR proposals to be finalised. Once finalised, however, it is understood that to ensure the Perth-Peel planning strategies and the final SAPPR are mutually supportive, a review of the Perth-Peel strategies may be required. This raises concerns as to what level of certainty will be able to be given to the final Perth-Peel strategies, prior to finalisation of the SAPPR process. This may present difficulties in considering proposals for region scheme amendments, and undertaking of major district structure planning studies, which may require that some adequate degree of certainty exist around matters such as future boundaries of proposed urban or industrial development.</p> <p>A further concern with the SAPPR study and how it may be integrated with the PP3.5 suite is the possible extent to which both may seek to make local government responsible for implementing proposals aimed at protecting matters of national environmental significance. This concern also relates to the proposed 'ecological linkages' which are shown in the draft sub-regional planning frameworks.</p> <p>As such, it is recommended that Local Government be given a greater degree of involvement in the study to ensure an optimal outcome for all involved.</p>
<p><b><i>Environmental principles</i></b></p>	<ul style="list-style-type: none"> <li>Section 3.1 (Key Planning Framework Principles)</li> </ul>	<p>Under Section 3.1 (Key Planning Framework Principles) of PP3.5, it is suggested that the text be amended to 'avoid, protect, mitigate and <b>enhance</b> environmental attributes...' to align with the sub-regional planning framework</p>

	<p>suggest amending text to 'avoid, protect, mitigate <b>and enhance</b> environmental attributes...'</p> <ul style="list-style-type: none"> <li>• Section 4.1 (Implementation Mechanisms and Actions) suggest amending text to 'identify, protect and <b>enhance</b> ecological linkages, where appropriate'</li> <li>• Section 3.1 (Beyond Directions 2031) suggest amending text to 'ensuring the regions' environmental assets are protected <b>and enhanced</b>'</li> <li>• Section 9 (Implementation) suggest amending text to 'Protect <b>and enhance</b> regionally significant natural areas, conservation assets and areas with high biodiversity value for the benefit of future generations'</li> </ul>	<p>objective listed on page 47 'to preserve and enhance the existing environmental and landscape values of the sub-region for future generations to enjoy'.</p> <p>Under Section 3.1 (Key Planning Framework Principles) greater clarity is required on what this would entail and whether this means that development is to be avoided adjacent to areas of high bushfire risk?</p> <p>Section 4.1 (Implementation Mechanisms and Actions), it is suggested amending the text to 'identify, protect and <b>enhance</b> ecological linkages, where appropriate' to align with the sub-regional planning framework objective listed on page 47 'to preserve and enhance the existing environmental and landscape values of the sub-region for future generations to enjoy'.</p> <p>Similarly, under Section 3.1 (Beyond Directions 2031) it is suggested amending text to 'ensuring the regions' environmental assets are protected <b>and enhanced</b>' to align with the vision on page 24 to 'preserve and enhance the existing environmental and landscape values of the sub-regions for future generations to enjoy'.</p> <p>Under Section 9 (Implementation), it is suggested amending text to 'Protect <b>and enhance</b> regionally significant natural areas, conservation assets and areas with high biodiversity value for the benefit of future generations' to align with the vision on page 24 to 'preserve and enhance the existing environmental and landscape values of the sub-regions for future generations to enjoy'.</p> <p>Section 8 (Environment and Landscapes) Conservation International refer to 35 global biodiversity hotspots: <a href="http://www.conservation.org/How/Pages/Hotspots.aspx">http://www.conservation.org/How/Pages/Hotspots.aspx</a>. This may need to be clarified.</p>
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