

Mr Jason Gordon
Planning Reform Team
C/o Department of Planning, Lands and Heritage
Locked Bag 2506
Perth WA 6001

Via email: planningreform@dplh.wa.gov.au

30th July 2018

Dear Jason,

Shelter WA Submission on Discussion Paper for Planning Reform

I'd like to congratulate the planning reform team on the work being progressed to review Western Australia's planning system. Also to thank you for the extension of time to provide feedback on the planning reform discussion paper.

Shelter WA is the peak body for social and affordable housing and ending homelessness in Western Australia. Our members provide social housing and tenancy support services to people across the housing continuum. This includes crises and supported accommodation providers, and community and affordable housing providers.

Access to affordable housing remains a critical issue across Western Australia. So too does housing affordability, as the location of homes relative to services, employment and transport, impacts on the cost of living. The location of housing matters. The fundamental question for Shelter WA is how can Western Australia's planning system facilitate housing affordability, and the provision of social and affordable housing, to meet the current and future needs of all Western Australians.

Rick Jacobus writes in *Inclusionary Housing: Creating and Maintaining Equitable Communities*, *"Unequal access to housing drives sprawling development patterns; worsens traffic congestion; pollutes air quality; increases taxpayer dollars spent on basis infrastructure; and decreases cultural and economic diversity...this basic dynamic will not change naturally."*

Planning regulation manages the use and development of land to optimise public value and create orderly and efficient urban development. What is important to Shelter WA is that the planning system facilitates opportunities to create diverse and inclusive communities. Affordable housing priorities in a planning context are not just good for individuals but delivers metropolitan efficiency and net public value.

Research shows that socio-economical homogenous areas create net community costs in terms of loss of diversity and broad social cohesion, intergenerational inequity, congestion costs to individuals and businesses, pollution costs to health and the environment and instability in local labour markets. For example, there is a cost to individuals and to society when key workers cannot afford to live close to where their work; when young people cannot find affordable housing near their families or where they study or work; when people from different cultural backgrounds cannot find the affordable, diverse housing stock that meets their cultural needs; or when people with disabilities cannot find appropriate, affordable housing within the community.

Australian States and international communities have planned for and facilitated the delivery affordable housing supply, and housing affordability, through the planning process. This includes inclusionary zoning, density bonuses and planning concessions, and provisions to maintain affordable housing in perpetuity. There is an opportunity for Western Australia's planning system to learn from these examples and to become a world leader.

Shelter WA would welcome the opportunity to discuss our submission with you. If you have any questions regarding this submission, please contact me on 9325 6660 or ceo@shelterwa.org.au.

Yours sincerely,



Michelle Mackenzie
Chief Executive Officer

Green Paper – Proposals for modernising the planning system

Shelter WA Response

This response template is intended to assist industry groups, local governments and practitioners respond in detail to the proposals outlined in the paper. The template is structured in accordance with the reform Proposals and the subheading and recommendations within those.

Completed templates may be submitted via the online survey at www.planning.wa.gov.au/planningreform. You will be directed to an upload page after the first two pages of identifying questions. Submissions close on 20 July 2018.

PROPOSAL		SUPPORT Yes/No/In Part	RESPONSE
1.0	A STRATEGICALLY-LED SYSTEM		
1.1	Prominence of Strategic Planning		
1.1.1	Provide in the PD Act that strategic planning is a purpose of the Act and provide a definition of strategic planning.	YES	<p>Shelter WA supports the intention and principles behind these reforms. In listening to our membership base, Shelter WA has heard many frustrations from the community housing sector, the community sector, developers, builders and individuals, with the current Western Australian planning system in facilitating social and affordable housing and housing affordability. Shelter WA is hopeful that these reforms will go some way in addressing a number of issues relating to transparency and consistency in the planning systems, as well as enabling the community to have productive input into the planning process.</p> <p>Shelter WA also suggests that that consideration must be given to the impact that these reforms will have on local governments, especially smaller local governments with less resources. While the shift to a strategic planning approach is likely to have many benefits, the transition period and support offered will be crucial to ensure local governments are not overburdened with current requirements, while also responding to the reform agenda.</p>
1.1.2	Provide in the LPS Regulations that the review of a local planning scheme must be informed by, and respond to, a review of the local planning strategy.	YES	This will ensure consistency between these key planning documents.
1.1.3	Provide in the LPS Regulations that a complex scheme amendment must be accompanied by a proposed amendment to the Local Planning Strategy.	Neutral	
1.2	Need to Explain Sustainability for Land Use Planning		

PROPOSAL		SUPPORT Yes/No/In Part	RESPONSE
1.2.1	An overarching State Planning Policy be developed which: <ul style="list-style-type: none"> i Provides a definition of sustainability for the planning system which reflects a balancing of economic development, environmental considerations, and social needs; ii Reinforces sustainability as an essential element required to be taken into account in the making of any strategy or policy; and iii Indicates the particular steps related to how economic, social and environmental factors are balanced. 	<ul style="list-style-type: none"> i – YES ii – YES iii - YES 	Shelter WA support this in principle but would like to seek further information on this proposal in the upcoming White Paper.
1.3	Housing Distribution		
1.3.1	Provide that every local planning strategy include a local housing strategy, except for low growth and small regional local governments which only require basic local planning scheme requirements.	YES	<p>Shelter WA strongly agrees that the issue of housing distribution should be of higher priority within the Western Australian planning system. Furthermore, Shelter WA recommends that not just housing distribution, but also housing affordability and the provision of affordable housing should also be greater considerations in WA planning system, including at a State and local level.</p> <p>Shelter WA therefore also strongly believes that local housing strategies should be developed by local governments, given their key role in assessing development and managing change and growth. Shelter WA, as the peak body for social and affordable housing, is in a strong role to support local governments to undertake these strategies. Shelter WA developed a ‘Local Government Guide to Developing an Affordable Housing Strategy in 2012 to assist local governments in this area. This guide included how a local government can undertake a comprehensive housing needs analysis. As highlighted in other areas of reform, the key to any strategy it its implementation. In this regard, Shelter WA believes it is critical that this reform agenda consider implementation of Local Housing Strategies, including how to ensure their objectives inform other strategic planning documents, there is accountability for objectives, and that these documents are reviewed regularly.</p> <p>Shelter WA uses the term ‘housing affordability’ in reference to the broad impacts that unaffordable housing can have on geographical areas, including its impact on the function, vibrancy and liveability of cities. Numerous reports produced by the Australian Housing and Urban Policy institute (AHURI) identify these negative impacts, plus also broader impacts on sustainability, transportation, labour markets and the economy (<i>van den Nouwelan, Crommelin, Herath, & Randolph, 2016</i>). Shelter WA uses the term ‘affordable housing’ when referring to housing that meets</p>

PROPOSAL		SUPPORT Yes/No/In Part	RESPONSE
			<p>the needs of low to moderate income earners, generally using the 30/40 rule i.e. the bottom 40% of income earners not spending more than 30% of household income on housing. Affordable housing can be public, community or private housing (with or without subsidy).</p> <p>International research suggests that Australia's land use planning systems can support an increase in housing supply, reduce barriers to affordable housing development, preserve and off-set the loss of low-cost housing, encourage and secure new affordable housing (<i>Gurran, et al., 2018</i>).</p> <p>The Green Paper indicates that there is a need to focus on strategic planning and goals, including sustainability. Shelter WA believes this would be well supported by a greater focus on housing affordability and affordable housing.</p>
1.3.2	The DPLH to provide guidance for local government in the Local Planning Manual on how to prepare a Local Housing Strategy, including a methodology for local housing analysis.	YES	<p>Shelter WA believes that further guidance is needed for local governments in this area, a reason why Shelter WA developed a 'Local Government Guide to Developing an Affordable Housing Strategy' to supplement Local Housing Strategies.</p> <p>Shelter WA also believes that there should be a better process to review these Local Housing Strategy to ensure they follow best practice methodology and are comprehensive before endorsement. The inconsistency between current Local Housing Strategies is significant, and it is questionable whether all will work to appropriately inform planning for housing. Shelter WA believes that consideration may also need to be given to an iterative process for assessing whether Local Housing Strategies are achieving results over time that are consistent with the strategic targets set in documents such as <i>Perth and Peel @ 3.5million</i>.</p> <p>While these recommendations may be considered onerous, as the Green Paper notes, Perth must continue to increase housing density and diversity to become a more sustainable city. Shelter WA does not believe that simply requiring local governments to prepare a strategy will be sufficient to achieve the desired results.</p>
2.0	A LEGIBLE PLANNING SYSTEM		
2.2	Arranging State Planning Policies for Brevity and Simplicity		
2.2.1	State Planning Policies be consolidated into a single state planning policy framework with supplementary technical guidance.	YES	Shelter WA support initiatives to improve accessibility, brevity and simplicity of planning policies. This can assist in creating a more informed general public, reduce confusion and enable better outcomes from planning decisions where the general public has an involvement.

SUPPORT
Yes/No/In Part **RESPONSE**

PROPOSAL			RESPONSE
2.3	Line of Sight		
2.3.1	<p>WAPC to establish common strategic “elements” for the State Planning Framework including but not limited to:</p> <ul style="list-style-type: none"> • A “sustainability” element • A “land use element” that includes the distribution of uses of land as well as density • A “housing element” that includes the types of housing • An “environmental element” • An “open space element” • An “urban form and design element” • An infrastructure element. <p>and prepare Technical Guidance for the details of each element to be included.</p>	Neutral	Elements should facilitate diverse supply of social and affordable housing and housing affordability with access to amenities and services
2.3.2	Provide that every State Planning Policy, Regional or sub-regional plan and the local planning strategy must follow these elements, unless otherwise agreed to by the WAPC.	Neutral	
2.3.3	Provide that every local planning strategy must explain how it has addressed the requirements of each common strategic element against the requirements of State Strategy, Planning Policy or Regional or sub-regional strategy.	Neutral	
2.3.4	Provide in the PD Act that all planning decision makers are to have due regard to State Planning Policies.	UNSURE	See below.
2.3.5	Provide in the Metropolitan Redevelopment Authority Act 2011 that in performing functions under the Act, the MRA must have regard to State Planning Policies.	UNSURE	The MRA currently has planning powers to facilitate the delivery of social and affordable housing through Development Control Policies, generally through the development of a Diverse and Affordable Planning Policy for a particular jurisdiction. Shelter WA would not support this change if it meant a reduction in the MRA’s power to mandate the provision of affordable housing in a jurisdiction. Furthermore, Shelter WA suggests that the planning system should play a greater role in facilitating the development of social and affordable housing, as mentioned previously.
2.4	Complexity locating and interpreting the local planning framework		
2.4.1	Require that a local planning scheme be published with the inclusion of the Local Planning Strategy (in the form of a local strategic statement) and Local Planning Policies in a	YES	Shelter WA support initiatives to improve accessibility, brevity and simplicity of planning policies. This can assist in creating a more informed general public, reduce confusion and hopefully better outcomes from planning decisions where the general public has an involvement.

	PROPOSAL	SUPPORT Yes/No/In Part	RESPONSE
	document to be called a “Comprehensive Local Planning Scheme”.		
2.4.2	DPLH to provide guidance for local government in the Local Planning Manual on the content and format of a Local Planning Strategy and Local Planning Policies.	YES	This should improve consistency between local governments when developing these key planning documents, making these easier to understand and navigate.
2.4.3	Local governments currently undertaking, or about to embark on, a substantive review of their planning frameworks delay preparation of local planning strategies and local planning schemes (and related omnibus amendments) until guidance on the format and content of local planning frameworks is available.	YES	This will ensure planning frameworks are in line with the changes sought through these reforms.
2.4.4	Provide in the LPS Regulations for a clear distinction of the purposes of Local Structure Plans, Activity Centre Plans, Local Development Plans and Local Planning Policies.	YES	Further guidance is likely to reduce confusion and can improve planning outcomes.
2.4.5	The DPLH to provide guidance in the Local Planning Manual on the appropriate use of each local planning instrument.	YES	Further guidance is likely to reduce confusion and can improve planning outcomes.
2.5	Form of a Local Planning Strategy		
2.5.1	The DPLH to update the Local Planning Manual with guidance on the preparation, content and format of a Local Planning Strategy and strategic statement, in a similar form to a Victorian Municipal Strategic Statement.	Neutral	
2.6	Form of Local Planning Policies		
2.6.1	The LPS Regulations be amended to provide that local planning policies are to be prepared in a manner and form approved by the WAPC.	Neutral	
2.6.2	The DPLH to update the Local Planning Manual to provide guidance for the form, content and writing of a local planning policy.	YES	This should improve consistency between local governments when developing these key planning documents, making these easier to understand and navigate.
2.7	Consistency of local planning schemes		
2.7.1	Provide in the PD Act that deemed provisions are to be included in a comprehensive local planning scheme.	Neutral	
2.7.2	Provide in the LPS Regulations that a comprehensive local planning scheme is to include a specific section for deemed provisions.	Neutral	

PROPOSAL		SUPPORT Yes/No/In Part	RESPONSE
2.7.3	Provide in the LPS Regulations that there are deemed provisions which set out standardised zones, land uses and land use permissibility which: <ul style="list-style-type: none"> i group like-land uses into themes for which common development standards can be prepared ii identify low risk land use proposals by including suitable parameters for which a streamlined planning process apply iii are mandatory for local government to adopt within their municipalities through the next scheme review or omnibus amendment. 	Neutral	
2.7.4	The DPLH to revise and keep up to date the Local Planning Manual to ensure it provides local government with the guidance required to prepare and administer its local planning framework and properly reflects the expectations of DPLH and WAPC.	YES	Further guidance is likely to reduce confusion and can improve planning outcomes.
2.8	Location of Local Development Standards		
2.8.1	Provide in the LPS Regulations that there be a location within the model provisions for mandatory development requirements for key sites and matters.	Neutral	
2.9	On-line Local Planning Schemes		
2.9.1	Develop an interactive Planning Portal for keeping local planning schemes online and accessing them in a legible and user-friendly format.	YES	Shelter WA support initiatives to improve accessibility, brevity and simplicity of planning policies. This can assist in creating a more informed general public, reduce confusion and hopefully better outcomes from planning decisions where the general public has an involvement.
3.0	A TRANSPARENT PLANNING SYSTEM		
3.2	Community Engagement		
3.2.1	The DPLH should develop a Community Engagement Charter for all aspects of the planning system that includes principles with regard to: <ul style="list-style-type: none"> i Planning authorities having a duty to engage with the community in a manner that allows residents to contribute to the making or amending of a strategic plan; and 	YES	Shelter WA believes that there is an opportunity to better engage the community in developing strategic planning instruments and to informing statutory planning decisions. Greater community understanding can improve planning outcomes, given the right level of engagement.

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	ii In the making or amending of a strategic plan, the community, as soon as possible, be given information as to what is proposed and any documents that the planning authority intends to examine.		
3.2.2	Align engagement processes in the planning regulations to the Community Engagement Charter.	YES	This would be required following development of the Charter.
3.2.3	Revise public notification and engagement requirements for planning proposals in the PD Act and LPS Regulations to update out-dated requirements.	Neutral	
3.2.4	Make provision within the LPS Regulations that the local planning strategy must be in accordance with the Community Strategic Plan under the Local Government Act to the extent that it is relevant.	Neutral	
3.2.5	DPLH to revise the Local Planning Manual to clarify that: i actions in local planning strategies are limited to those matters that can be carried out within the local planning scheme ii acknowledge a concurrent community participation process between a Strategic Community Plan and a local planning strategy.	YES	This would reduce confusion for planners and the public alike.
3.3	Reasons for Decisions		
3.3.1	The DPLH to publish a Guide as to the Scope of Reasons by Planning Decision Makers, having regard to the Queensland model.	YES	Shelter WA supports improved transparency and accountability through the planning system.
3.3.2	Provide in the LPS Regulations that reasons for decisions are to be provided on planning proposals.	YES	Shelter WA supports improved transparency and accountability through the planning system.
3.4	Transparency of DPLH and WAPC Statutory Reports		
3.4.1	WAPC practice be modified to publish Statutory Planning Committee and WAPC agenda items, reports and recommendations on region and local schemes and amendments.	YES	Shelter WA supports improved transparency and accountability through the planning system.
3.5	Reporting by Local and State Government on Planning Matters		
3.5.1	Provide in regulations mandatory reporting by local government on planning matters.	YES	Shelter WA supports improved transparency and accountability through the planning system.

PROPOSAL		SUPPORT Yes/No/In Part	RESPONSE
3.6	Transparency and Accountability of Development Assessment Panels		
3.6.1	Provide for DAP meetings to be held at regular times and outside of business hours.	Neutral	
3.6.2	Provide for the recording of each meeting of a DAP and made available on the DAP website of DPLH.	YES	Shelter WA supports improved transparency and accountability through the planning system.
3.6.3	3.6.3 Provide clarification in DAP Practice Notes: i. If new information is submitted to the DAP after an RAR, the DAP should consider whether a decision should be deferred pending further RAR advice ii. As to when it may be appropriate to defer a decision, such as where issues are raised which require further detailed technical consideration by responsible authorities.	Neutral	
3.6.4	Amend the DAP Practice Notes to require reasons for decisions to be given in all decisions made by a DAP, including where the DAP adopts the responsible authority's recommendation contained within the RAR.	YES	Shelter WA supports improved transparency and accountability through the planning system.
3.6.5	Provide for a requirement that applications amended through a SAT process are readvertised unless the amended plans comply with all development standards.	Neutral	
3.6.6	Provide that where a DAP has been invited to reconsider its decision following a SAT mediation, new specialist members be drawn from the available pool of members.	Neutral	
3.6.7	The SAT should consider preparing a framework for allowing parties with a sufficient interest in a matter to make a submission or be heard during SAT mediation of DAP matters.	Neutral	
3.6.8	Provide for expert DAP members to be drawn from a pool of members across the State on the basis of the type and complexity of the application being heard.	Neutral	
3.6.9	Provide for an expanded and flexible meeting process where the DAP Presiding member is of a view in relation to an application for development that wider community and local government viewpoints need to be examined.	Neutral	

PROPOSAL		SUPPORT Yes/No/In Part	RESPONSE
3.6.10	Provide in the DAP Regulations that the WAPC retains its decision making ability with respect to development applications under region schemes.	Neutral	
3.6.11	Provide for a Presiding Member to be appointed also as the Chief Presiding Member to: <ul style="list-style-type: none"> i Oversee the quality and consistency of DAP procedures and decisions (such as consistency of the use and content of conditions; the quality of RAR reports) and recommend changes to DAP procedures and Standing Orders to DPLH ii Assist in identifying panel members appropriate to sit in accordance with the basis of the type and complexity of the application being heard iii Identify training needs for DAP members for the approval of the Director General DLPH. 	Neutral	
4.0	AN EFFICIENT PLANNING SYSTEM		
4.1	Arrangement of the WA Planning System		
4.1.1	Provide that the PD Act be amended to delete the WAPC function s14.(a)(ii) of advising the Minister for Planning on the administration, revision and reform of legislation.	Neutral	
4.1.2	Provide for a local government accreditation process.	Neutral	
4.1.3	Increase delegations from WAPC to DPLH and local government, for the purpose of the WAPC focussing on the State policy framework and regional strategic planning.	Neutral	
4.1.4	Provide for the PD Act to be amended to: <ul style="list-style-type: none"> i Revise the membership of the WAPC to 5-7 members to have experience, skills or knowledge of any one or more of the following fields— <ul style="list-style-type: none"> • planning, including strategic land use planning in metropolitan or regional areas • infrastructure planning, delivery, policy and strategy • public administration and public policy • property development • housing supply • corporate or public sector governance • economics, finance or financial management 	Neutral	Consideration should be given to the inclusion of experience, skills and knowledge from the community services sector. Housing supply should include community and affordable housing supply

PROPOSAL	SUPPORT		RESPONSE
	Yes/No/In Part		
<ul style="list-style-type: none"> • management of business or commercial ventures • local government. ii Remove committees of the WAPC from Schedule 2, in favour of an ability for the WAPC to establish committees to advise the Commission on any matter, recognising the Statutory Planning Committee and Executive, Finance and Property Committee carry out core functions of the WAPC and will be required immediately under this new system. A committee would consist of at least one member of the Commission who is to be the chairperson of the committee.			
4.1.5	The role and purpose of a Coastal Planning Committee be reviewed, and consideration be given to the most appropriate host organisation and regulatory framework for the Committee.	Neutral	
4.1.6	Revise the Service Delivery Agreement between the WAPC and DPLH to accord with the revised roles of the WAPC and DPLH.	Neutral	
4.1.7	Provide for new positions to be created to enable DPLH to recruit senior and experienced town planners to undertake strategic planning and policy development for the WAPC.	Neutral	
4.1.8	The DPLH and WAPC establish a protocol for the engagement of non-public sector expertise in the scoping and development of policies.	YES	This could improve development of policies, ensuring they are appropriate and applicable. In developing a protocol, there would need to be assurances that policies aren't being changed to benefit the private sector at the detriment of planning objectives.
4.2	Process Efficiency for Planning Proposals		
4.2.1	A Planning Reform Team be retained by DPLH to implement proposals arising from the planning review and ongoing reforms to the Western Australian planning system.	YES	This is likely to be a significant program of reform. As alluded to in previous statements, how this program is implemented will be critical to its success. Many of the reforms proposed require the engagement of a large number of stakeholders with sometimes conflicting views and interests. We strongly support the role of a capable, empowered team to implement the reforms that are adopted. It is critical that one of the first actions once the reforms are decided, that an implementation timeline is developed and communicated with key stakeholders.
4.2.2	A framework for referral of planning applications, to be incorporated in regulations as appropriate.	Neutral	

PROPOSAL		SUPPORT Yes/No/In Part	RESPONSE
4.2.3	As an interim arrangement, the DPLH Independent Planning Reviewer be available to assist on issues regarding referral for WAPC matters.	Neutral	
4.2.4	Provide in regulation that an applicant may seek pre-lodgement advice for development applications.	YES	This would benefit applicants and assessors alike.
4.2.5	Development Assessment Guidance be published by DPLH in consultation with local government and industry bodies.	YES	This would benefit applicants and assessors alike.
4.2.6	Provide in the LPS Regulations that a local government must advise an applicant within 10 business days of receipt of a development application whether additional information is required.	Neutral	
4.2.7	Provide a procedure for local government and developer proponents to agree upfront the scope and content of a local structure plan with the DPLH and other agencies as appropriate.	Neutral	
4.2.8	Provide in the PD Act that the implementation section (part one) of approved structure plans and activity centre plans are to be read as part of the scheme and have the “force and effect” of the scheme.	Neutral	
4.2.9	Provide in the LPS Regulations that local government may refuse to progress a local structure plan or activity centre plan and amendment, if it is of the view that the proposals lacks sufficient planning merit. The amendment should also include ability for a proponent affected by such a decision to seek the views of the WAPC and the power for the WAPC to direct a local government to progress a proposal.	Neutral	
4.2.10	Provide for development contribution plan cost and cost contributions schedules to be included as a schedule in local planning schemes.	Neutral	
4.2.11	Establish a Development Contributions Infrastructure Panel to review proposed local planning scheme amendments that include Development Contribution Plans, with the cost of the review to be included as a development contribution plan administration cost.	YES	Shelter WA supports improvements in the planning and co-ordination of infrastructure in WA. Research suggests there can be significant improvements in the way this is currently done in WA, leading to improved diverse and affordable housing outcomes. The current way infrastructure is provided in WA could be adding to the cost of housing through a lack of cost certainty, therefore increasing developers risk (Rowley & Phibbs, 2012). Shelter WA supports improving coordination between state agencies, and state and local government, and suggests

PROPOSAL		SUPPORT Yes/No/In Part	RESPONSE
			that greater certainty in the costs of infrastructure are needed, especially for infill development.
4.2.12	Provide for in the PD Act an ability for the Minister for Planning to: <ul style="list-style-type: none"> i require a special report from a local government on the operation of a development contribution plan ii instruct a local government to take particular actions for the administration of a development contribution plan. 	Neutral	
4.2.13	Provide in the LPS Regulations for a voluntary 'deemed-to-comply' check for single houses and provide in the P&D Regulations a specified fee for the service.	YES	The fast delivery of low-risk housing projects such as single houses will support increases in housing supply and housing affordability.
4.2.14	Provide in the LPS Regulations and R-Codes a fast-track 30-day planning approval process for single house applications that require only minor variations to the R-Codes.	YES	The fast delivery of low-risk housing projects such as single houses will support increases in housing supply and housing affordability.
4.2.15	A framework for "Basic", "Standard" and "Complex" streams for region scheme amendments, local planning strategies and amendments, and local structure plan/activity centre plans and amendments be developed by DPLH for implementation through regulation.	Neutral	
5.0	PLANNING FOR CONSOLIDATED AND CONNECTED SMART GROWTH		
5.1	Planning for Targeted Urban Infill		
5.1.1	That the State Government develops clear arrangements for the planning and delivery of the key urban infill locations of activity centres, urban corridors and station precincts, including prioritising of areas which require State and local government collaboration.	YES	Large complex projects are more likely to proceed, and to achieve quality outcomes, where planning and delivery are well coordinated. Working at a precinct-wide scale, rather than a project-by-project basis will bring benefits. Shelter WA believes that State Government-led planning will reduce the relative risk to project proponents and increases the chance of well integrated developments that can deliver better overall outcomes, including in relation to diverse social and affordable housing supply.
5.2	Updating Growth Management Policies		
5.2.1	A new Consolidated and Connected Smart Growth State Planning Policy that builds on the State Government's METRONET policy and establishes contemporary smart growth principles and practices.	YES	Shelter WA agrees that State Planning Policy must reflect the intentions of the METRONET program of activities, as they are significant. The target to accommodate 47 percent of new dwelling growth in infill areas appropriately is a key challenge for Perth's planning system. The land use planning changes around METRONET stations provide a significant opportunity to deliver a large number of infill dwellings and work towards this target.

PROPOSAL		SUPPORT Yes/No/In Part	RESPONSE
			Shelter WA believes that a strong focus of these areas should be on delivering a range of diverse housing opportunities and choices, including social and affordable housing. This included for a range of households and demographics.
5.3	Planning for Land Use and Infrastructure Coordination		
5.3.1	The WAPC to assist with land use and infrastructure coordination for the delivery of priority precincts through a renewed Committee.	YES	Shelter WA supports improved land use and infrastructure planning.
5.4	Coordinating State Infrastructure with Regional Rezoning		
5.4.1	Provide in the Metropolitan Region Scheme an "Industrial Deferred Zone".	Neutral	
5.4.2	The WAPC to ensure that any requirements for State infrastructure are in place in the lifting of Urban Deferment or Industrial Deferment, and that the draft Guidelines for Lifting of Urban Deferment 2017 be amended accordingly.	Neutral	
5.5	Coordination of Infrastructure for Land Development		
5.5.1	Provision be made for advice on the forward planning of State infrastructure, including utility providers to assist local governments in the preparation of local planning strategies and structure plans.	YES	Shelter WA supports improvements in the planning and co-ordination of infrastructure in WA. Research suggests there can be significant improvements in the way this is currently done in WA, leading to improved diverse and affordable housing outcomes. The current way infrastructure is provided in WA could be adding to the cost of housing through a lack of cost certainty, therefore increasing developers risk (Rowley & Phibbs, 2012). Shelter WA supports improving coordination between state agencies, and state and local government, and suggests that greater certainty in the costs of infrastructure are needed, especially for infill development.
5.6	Coordination of Land Use and Transport for Corridor Development		
5.6.1	The MRS be updated to include "Urban Corridor" as a category of Reserved Roads based on Perth and Peel @ 3.5 Million, with the Department of Transport being made responsible for coordinating a whole of transport portfolio response to planning proposals along the corridor.	Neutral	
5.6.2	A review be undertaken of regional road reservations in place to accommodate road widenings within the Metropolitan Region Scheme for designated Urban Corridors.	Neutral	
5.7	Liveable Neighbourhoods		

PROPOSAL		SUPPORT Yes/No/In Part	RESPONSE
5.7.1	Liveable Neighbourhoods be elevated to a state planning policy and maintained and refined as a best-practice approach to new greenfield development at regional, district and local level, rather including it into a single Neighbourhood part of Design WA.	YES	Liveable Neighbourhoods has been known for supporting the delivery of good greenfield developments. Shelter WA supported improvements to Liveable Neighbourhoods in 2015 but believes that Liveable Neighbourhoods could be further improved through recognising that the provision of social and affordable housing is a key requirement for sustainable neighbourhoods.

References

- Gurran, N., Gilbert, C., Gibb, K., van den Nouweland, R., James, A., & Phibbs, P. (2018). *Supporting affordable housing supply: inclusionary planning in new and renewing communities*. Sydney: AHURI.
- Rowley, S., & Phibbs, P. (2012). *Delivering diverse and affordable housing on infill sites*. Perth, Western Australia: AHURI.
- van den Nouweland, R., Crommelin, L., Herath, S., & Randolph, B. (2016). *Housing affordability, central city economic productivity and the lower income labour market*. Sydney: AHURI.