

31 December 2018

Hon Matthew Swinbourn MLC
Chair, Standing Committee on Environment and Public Affairs
Legislative Council Committee Office
18-32 Parliament Place
West Perth WA 6005

Dear Mr Swinbourn

Petition No. 096 - Subiaco Draft Local Planning Scheme No. 5 (LPS5) & Draft Local Planning Strategy (LPS)

Thank you for your correspondence of 5/12/2018, offering the opportunity to provide a submission on the matter. Please find as follows in relation to the aforementioned petition:

- **WAPC/Minister Imposed Unjustified Density**

The WAPC increased dwelling numbers in the draft LPS5 by approximately 50% over and above the Perth and Peel @ 3.5 million population targets (from 6,140 dwellings to approx 8,900 dwellings). According to the WAPC Chairman, David Caddy, in a meeting with Save Subi representatives on 29/5/2018, this increase was the result of a request by Minister Saffioti, who “wanted to see what density around the Daglish and Shenton Park train stations would look like”. This resulted in the METRONET policy of an 800m radius of medium to high density around those train stations and in Subiaco’s case through large swathes of historical homes. The Chairman also admitted to Save Subi that the scheme was ‘faulty’ but that the process could not be halted.

With these admissions, there is significant concern that proper process was not followed in the assessment and provision back to the City of Subiaco of the WAPC approved scheme and strategy for public advertisement. The extra density was added without proper justification or consultation with stakeholders.

- **Integrated Planning Required**

The Subiaco East area, now in the control of Landcorp/MRA is still in initial stages of visioning. Density capacity, targets and built form outcomes are not yet known. The Government is proposing that this area can take additional density in order to reduce the unjustified extra density around the heritage train stations contained in the WAPC imposed Draft LPS5. This has been widely published in the media. However, in addition, the Subi Centro area (MRA), the North Subiaco Structure Plan (NSSP), the Subiaco Town Centre Activity Plan and the forthcoming Blackburn proposal for the redevelopment of the Pavillion Markets site all point to the urgent need for a consolidated, integrated approach to the City’s planning dilemmas so that a liveable, cohesive and positive solution is achieved.

- **Inadequate Reporting and Consideration**

The draft LPS and LPS5, through either blanket and/or ad-hoc rezoning as contained therein, allows for the potential destruction of large areas of the City’s architectural character and historical value. It will drastically impact on its tree canopy, open space (already under quota), schools and other facilities, streetscape and amenity. Traffic, infrastructure, environmental and health impact reports that are critical with such increased retrofitted density in an already dense historical City comprised of mostly small lots, have not been undertaken. Current density figures sit the City at the top end of density throughout the Metropolitan area. <https://profile.id.com.au/subiaco/dwellings?WebId=10>



Save Subi Recommendation

- Save Subi recommends that an integrated planning approach will help solve the problem, where a 'whole-of-city' visioning process that includes the community, is undertaken and the LPS and LPS5 are logically finalised and reviewed only after that vision, and the designs and Masterplan for Subiaco East are complete.
- Subiaco in the year 2050, could be the historical village precinct of the CBD, give the small lot framework on which it was planned and founded. In embracing this opportunity, it presents a real and unique potential for economic development through tourism, hospitality, retail and culture. This sort of positive vision is an opportunity lost with the current draft LPS and LPS5.
- Both the Government's revised population forecasts have significantly downgraded forecasts and Minister initiated Planning System review green paper, with its recommendations yet to be fully assessed and possibly implemented, are important to both the outcome of a better strategy and scheme and the manner in which it could be undertaken in order to improve community regard and sentiment and of course the plan itself.

In conclusion

The community has made its wishes very clear through their submissions, letters to Ministers and to the press for the last 8 months. It has duly followed the process for public comment with an overwhelming response for rejection of the draft LPS and LPS5 that it does not see as legitimate. It sees the future of the City being dictated by politics and ideological policies, developer lobbyists and political ambition, both at State and Local level.

To be clear, the community does not shirk the responsibilities of increased density in the City, nor of diversity, nor of the need for social housing. Facts show that the City has been a leader in all these areas over its entire history. But it needs to be planned for carefully, thoughtfully and in an integrated fashion that takes into account the unique nature of Subiaco and its history, and the potential that lies in its preservation and enhancement.

As such, we welcome the investigation of the Committee into the process by which this set of circumstances has been put to the Subiaco community and look forward to being advised of its findings. Thank you very much Matthew, please do not hesitate to contact us if we can be of further assistance.

Your sincerely

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Genevieve Binnie
Convenor

A handwritten signature in black ink, appearing to read 'Mark Tonti', written in a cursive style.

Mark Tonti
Convenor

cc. Hon Peter Collier MLC
Hon Alison Xamon MLCd