



PARKS AND LEISURE AUSTRALIA

SUBMISSION TO THE WESTERN AUSTRALIAN PLANNING COMMISSION

SUB-REGIONAL STRATEGIES

*Prepared on behalf of PLA WA members engaged in the parks, recreation and
leisure industries*

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TABLE OF CONTENTS

1.	PARKS & LEISURE AUSTRALIA	2
1.1	National Body Aims	2
1.2	Western Australian Region	3
2.	CONTEXT OF THIS SUBMISSION	4
2.1	Public Open Space Position Paper	4
2.2	Open Space Planners Network	5
3.	KEY CONCERNS	6
3.1	Directions 2031 and beyond	6
3.2	Provision of Regional Open Space	7
3.3	Provision of District Open Space	8
3.4	Provision of Local Open Space	8
3.5	Planning for and Provision of Infrastructure	8
3.6	Public Open Space Strategies	10
4.	RECOMMENDATIONS	11
4.1	Land Acquisition Program	11
4.2	Development and adoption of guidelines for active open space provision	11
4.3	Provision of infrastructure – Outer sub region	12
4.4	Review of infrastructure – Central metropolitan sub-region	12
5.	CONCLUSION	14
6.	APPENDIX ONE	16

1. PARKS & LEISURE AUSTRALIA

Parks and Leisure Australia is the key professional association in Australia that provides the Parks and Leisure industry with leadership, advocacy and direction in industry standards, training and professional development opportunities and product innovation.

Parks and Leisure Australia (PLA) promotes cooperation between people and organisations involved in public parks, botanic gardens, open space environments and recreation and leisure facilities and services. It is also an advocate of the Australian parks and leisure profession to all levels of government and business to maintain a high standard and status for professionals in the Australian parks and leisure industry.

Parks and Leisure Australia provides focus, advice and support across a range of disciplines and represents a broad range of professionals nationally with more than 1600 members, and has local, national and international affiliations.

1.1 National Body Aims

The aims of PLA are as follows:-

- To provide a national organisation which promotes co-operation and mutual assistance between persons and organisations associated with public parks, botanic gardens and open space environments; recreation and leisure facilities and services.
- To promote the aesthetic, scientific and social development and study of all matters related to and impacting on, the management and operation of public parks, botanic gardens and open space environments; recreation and leisure facilities and programs.
- To act as an advocate and representative body of the Australian parks and leisure profession to all levels of government and business instrumentalities.
- To promote a conservation ethic within the profession and throughout the parks and leisure industry
- To maintain a high standard and status for the professions within the Australian parks and leisure industry.
- To assist in the development of parks and leisure professionals through the promotion and support for appropriate information, education and training opportunities.
- To arrange meetings and opportunities for member information exchange, through formal and informal forums and conferences, as well as disseminate a range of published material relating to all aspects of parks and leisure services.
- To encourage the application of appropriate resources towards the development and maintenance of parks and leisure services across Australia.
- To stimulate the development of service levels within the industry and the achievement of best practice.

1.2 Western Australian Region

The PLA Western Australian Regional Council (PLAWA) acts both independently and in concert with PLA National Office (NO). At an independent level, PLAWA is responsible for coordinating local events and providing response to local and national issues. From time to time, the region will also take carriage of a national project on behalf of national office. This submission represents the collective views of the PLA WA membership involved in open space planning and provision of services related to open space.

2. CONTEXT OF THIS SUBMISSION

Parks & Leisure Australia (WA) welcomes the opportunity to contribute to the quality of the planning tools being developed by the WAPC and Department of Planning, to set the framework for the development of the Perth and Peel regions. This submission focuses on issues around the planning for and provision of social infrastructure including both active and passive public open space.

2.1 Public Open Space Position Paper

Parks & Leisure Australia (WA) has been increasingly concerned at the erosion of the quality and availability of public open space (POS) for the Western Australian community. POS within residential developments contributes to a range of community service and environmental functions. Apart from providing spaces for sport and physical activity, children's play and exploration, relaxation and social interaction, POS can enhance the visual amenity of the landscape and assist with urban water management and nature conservation. POS contributes to engendering a sense of place and community connection, influencing feelings of community safety, contributing to economic value of neighbourhoods, providing spaces for community facilities, cultural festivals and events and significantly enhancing residents' quality of life.

Early in 2010, PLA WA released its position paper on the provision of public open space in new residential developments¹. The paper is provided in full as an appendix (Appendix One) to this submission. This paper was developed following a series of intensive workshops with key stakeholders and practitioners throughout the metropolitan and Peel regions, and was preceded by a comprehensive discussion paper which identified the key issues relevant to the industry and the community. The paper identified six key action items. The majority of these are relevant to the two sub-regional strategies under consideration. Of particular relevance here are items 3-6, as reproduced below:-

- Options for proportional allocation (representing up to 10% of subdivisible land) of community, active and environmental open space as suggested in Table 1 must be considered within future development plans. Where allocation may exceed 10% of subdivisible land, proportion of allocation based on purpose (community, active or environmental open space) would be adjusted accordingly.
- Where housing density is increased, particularly using the proposed development frameworks supported by Directions 2031 (the spatial planning framework for Perth and Peel), the proportion of high quality POS ought to exceed the current standard of 10%. It is suggested that POS allocations of up to 50% need to be considered in areas containing high rise (R120 and above) and where regional attractions (such as foreshore or river systems) increase visitation beyond local residents.
- Allocation of land for multi-district reserves needs to be considered as a function of both state and local government. Multi-district reserves may service communities across several local government authorities and provide opportunities for diverse recreational, sporting and nature-based activities. This is in keeping with the findings of the Crawford Report (Item 6.6) that recommends that "preference should be given to infrastructure projects that engage wide sections of the community, such as multi-sport facilities in proximity to other community infrastructure, to help with sustainability and increase social capital"

¹ Carter M et al; Public Open Space Planning in Western Australia: New residential Developments PLA WA 2010

- A mechanism to acquire large tracts of land, outside of the current Metropolitan Region Scheme, that may be suitable for multi-purpose recreational and sporting use is essential. Table 2 outlines how various levels of POS fit within current policy and how multi-district reserves might be incorporated within current public open space hierarchies and new definitions of community, active and environmental open space proposed by PLA WA. (see Appendix One for table)

Our submission to the WAPC builds on these key recommendations.

2.2 Open Space Planners Network

PLA WA operates a number of interest groups within its organisation. A significant group is the Open Space Planners Network (OSPN). This group comprises more than fifty people involved in open space planning from state and local government agencies and the private sector. We share a common interest in ensuring that the provision of public open space achieves the expectations of and provides relevance to the community. The OSPN meets around quarterly and considers issues of concern to the industry as a whole. It shares knowledge and approaches with similar networks elsewhere in Australia, notably the Victorian Open Space Planners Network and a similar group in Queensland.

The group has collaborated with other policy makers such as the *Department of Sport and Recreation* and has provided a consultative mechanism, essential industry feedback and brought real value in the diversity of disciplines PLA's Open Space Planners Network represents to a recent joint project. This has resulted in a classification framework for open space, clarity for terminology, detailed understanding of the level of space needed by communities and the population and distance thresholds for increasing the provision of active open space.

PLA WA has now commenced further work on developing guidelines for the provision of essential social infrastructure in relation to population expansion and thresholds and is developing an association with the Physical Activity Taskforce to build on opportunities for synergy in research and policy development.

3. KEY CONCERNS

3.1 Directions 2031 and beyond

PLA congratulates the *Western Australian Planning Commission* (WAPC) and *Department of Planning* (DoP) for these comprehensive and timely documents and for the opportunity to comment on the content and commitments of the two sub-regional strategies.

Given the draft sub-regional documents reflect principles adopted in the high level spatial framework *Directions 2031 and beyond*, throughout this submission reference is made to the three documents as one. This is also done to consider the detail of the sub-regional documents against the broader commitments made in the adopted principal document.

PLA supports the strategies listed under the Key Themes (page 22 of *Directions 2031 and beyond*) and in particular the broader planning theme number 2: “concern for the protection of green spaces” (page 26).

It is understood that this document is aimed largely at residential development and centres strategies to accommodate population growth. It is acknowledged that much work is yet to be done by a number of agencies to guide implementation of the stated objectives.

PLA WA considers that the document is limited in relation to:

- Unavailability of a completed transport network study to support access and circulation considerations.
- Unavailability of a completed industrial study supporting employment centres and allowing consideration to be given to competing land requirements for district and regional open space.
- Further consideration required for metropolitan attractors to inform detailed sub-regional and local planning.
- The provision of social infrastructure in relation to strategic centres and their roles.
- Urban design solutions for improved roads to accommodate gradual density increases and multiple users, ie. encouraging cycling, walking and urban forestry.
- Differentiating and accommodating POS requirements for urban corridors of higher density from the adjacent lower density areas.
- Direction on resolving conflicting demands for land identified as naturally/culturally significant and that for urban development and in particular for drainage and active open space use.
- Clear acquisition and management responsibilities for regional reserves including river and coastal foreshores, bushland and wetland environments.

- Utilisation of the Metropolitan Regional Improvement Funds for the purpose of purchasing land for regional open space, particularly regional active open space.
- Definitions for local, district and regional infrastructure need to be refined to assist with determining acquisition, capital and management responsibilities.
- An expanded and enhanced open space network that includes adequate active spaces to service the needs of the community. You are referred to the Curtin University *Centre for Sport and Recreation Research* publication: *Emerging Constraints for Public Open Space in Perth Metropolitan Suburbs: Implications of Bush Forever, Water Sensitive Urban Design and Liveable Neighbourhoods for Active Sporting Recreation (October 2010)*. The findings of this report point to current active sports ground supply as being insufficient and constrained by these three operational policies.
- Unavailability of equitable services and infrastructure development programs for new and existing areas, yet to be developed through the WAPC's Urban Development Program.
- Direction on resource allocation and responsibilities for social infrastructure provision.
- Commitment by the WAPC to review POS provision related to urban density and not subdivisible land area.
- Commitment to plan for active and passive POS in conjunction with the *Department for Water*.
- Commitment by the WAPC to seek assistance and funding to address reserves that are constrained by investigations and works for remediation.
- Detailed monitoring, review and reporting commitments.
- Reduction in available active open space in inner urban areas through new and redevelopment of schools (e.g. Swanbourne and Hollywood high schools).
- Insufficient guidance for the provision of public open space, simply reiterating current planning practices rather than considering any alternative approach.

3.2 Provision of Regional Open Space

We note that while the Directions 2031 document refers to the provision of regional open space, it states:

Directions 2031 encourages local government to institute public open space strategies in order to:

- *Strategically guide the development of a system of diverse and well-distributed public open spaces;*
- *Ensure adequate provision of regional and district active recreation sites.*

- *Incorporate protection of the natural environment and water management concepts into the development of public open space; and*
- *encourage walking, cycling and sports as part of the overall community health picture.*²

Directions 2031 is committed to biodiversity protection and the ongoing implementation of Bush Forever as the overriding principle for acquiring district and regional open space in the document. There are significant competing needs for drainage, active and community open space for the same land. However, the adequate provision of regional open space is also the task of the WAPC. This is for both active open space and community open space. Local Government can assist with local planning strategies to support the provision of regionally significant active sport facilities, social infrastructure, cultural and natural heritage features. It is our view that planning for regional open space needs to be coordinated at regional level by the WAPC, which should be responsible for identifying suitable land and fund acquisition and the development of social infrastructure. Other agencies, such as the *Department of Water and the Department of Environment and Conservation* would be more suitable for the acquisition and management of regional green reserves.

3.3 Provision of District Open Space

The quality and quantity of district open space provided in the previous ten or so years does not meet current community need and is likely to be over utilised if the level of anticipated urban growth is reached over the next twenty years. Given the limited resources of local governments, land for district open space should be secured as a matter of urgency by the WAPC utilising Metropolitan Regional Improvement Funds.

3.4 Provision of Local Open Space

The WAPC Liveable Neighbourhoods operational guidelines has delivered poor active open space and passive open space outcomes and a plethora of small pocket parks of limited use beyond a location for a small children's playground. A variety of forms and functions in local POS is supported, particularly in higher density locations, but often very small areas of POS lead to conflicts of use, higher maintenance costs for local government and limited recreation destinations for communities.

3.5 Planning for and Provision of Infrastructure

3.5.1 Social Infrastructure

In the outer urban area and Peel, the Directions 2031 document does not address social infrastructure for green field developments outside of Liveable Neighbourhoods. Increased housing densities and lot yields will reduce the private space available for social connection, including family gatherings and celebrations and ultimately impact on the public realm for these activities.

² Directions 2031 and Beyond Dept of Planning & WAPC; August 2010 p 45

In the central area, renewal of transit oriented urban areas requires the inclusion of all levels of public security, health and social support. Unsociable behaviour and homelessness is increasingly problematic in public spaces of centres along train and major bus routes. Serious consideration needs to be given to effect community support programs implemented in conjunction with crime prevention design and urban renewal.

Additional emphasis should be placed on specific cultural community support and development at the same centres. Often the transit oriented settlement increases are by those establishing unique cultural identity. Land use planning cannot be effective without recognising community character and need and by engaging with other services agencies.

3.5.2 Better Urban Water Management

Caution is required when applying water sensitive urban design principles. The misuse of these principles in urban infrastructure design can be short sighted and counter productive. As with all design philosophies, they should be used as principles only with solutions designed and implemented specific to each situation. Directions 2031 should include a statement to encourage and facilitate further learning for those responsible for requiring, approving, designing and managing stormwater in an urban catchment.

3.5.3 Urban design solutions for roads

For urban redevelopment, careful consideration should be given to the effective planning and funding for street improvement, to include the accommodation of street trees, pathways, cycle ways, parking contributions, refuse collection, improved streetscape amenity and varied use, etc. Work undertaken by Dr Greg Moore³ has identified the contribution trees make to the preservation of road and footpath pavement through their cooling effects as well as the added value and contribution to social capital that street trees may make to an urban environment. Significantly enhanced street tree and parkland environment could effectively be incorporated in this document.

Responsibility for the provision of recreational and local path systems is with LGAs, not the Perth Bicycle Network. Local Governments should be included in the planning of all bicycle and walking routes.

3.5.4 State Policy

There is a lack of cohesion between the Directions 2031 documents and the policy framework which should inform and drive many of the innovations. This disconnect will limit the effectiveness of the strategies and as a consequence, most of the impact of these strategies will fall to the responsibility of local government through lower level planning documents such as structure plans and subdivision

³ <http://www.landfood.unimelb.edu.au/resman/staff/cv/Moore.htm>

applications. There needs to be a greater commitment and leadership to delivering the infrastructure required for the anticipated growth in population. Policies such as Development Contribution Policy SDP 3.6 may assist with providing guidance for acquiring land and infrastructure for public open space and social infrastructure and should be referred to in the Direction 2031 documentation. This needs to be addressed in the two draft sub-strategies.

The associated planning to facilitate a prioritised program of land acquisition and infrastructure development is a matter of urgency ahead of subdivision planning.

3.5.5 Shared Facilities with Schools

We caution against the inclusion of school facilities as shared use public open space. There is an increasing reliance on calculations for public open space to include school grounds. In the inner urban areas this has become a somewhat fraught problem with the redevelopment of schools as residential land and the subsequent removal of that open space. In our view, shared space arrangements with schools should be specifically excluded from any calculations of the availability of public open space. Shared cost grounds development and maintenance vary between projects and the *Department of Education and Training* has not always met its agreement obligations. There have been some instances where schools have subsequently excluded public access by installing security fencing, or withdrawn from agreements with LGAs.

3.6 **Public Open Space Strategies**

While it is ideal for Local Governments to consider and plan for the quantity and quality of POS in each Municipality through its local planning strategies, it can be onerous for many urban local governments to provide adequate resources and to address competing priorities to deliver a range of strategies. Given the need to address district and regional open spaces as a priority, it would be reasonable for the WAPC to broker sub-regional planning and resourcing to assist with delivering quality outcomes in this regard.

There is also a role to play for the state government through the *Department for Sport and Recreation* or other agencies, to assist with a prioritised program of development and funding for the construction of sportsgrounds and related facilities, and in particular criteria for active open space acquisition and development through the Metropolitan Regional Improvement Fund.

In this, PLA is in a position to provide significant high-level advice on location, design and variety of POS provision.

4. RECOMMENDATIONS

4.1 Land Acquisition Program

Directions 2031 and its sub-regional strategies support the WAPC's ongoing acquisition of land for the green network, possibly as part of Metropolitan Attractors and possibly through direct purchase. It is clear that future reservations under the MRS would be for natural areas dedicated to preserving the amenity and access to foreshores and existing reserves in the central region and for reservation of Bush Forever in the outer region. However, this does not address 'fit for purpose' land acquisition for other public purposes, particularly active regional open space.

It is recommended that:

- 1) The WAPC acquire suitable land for active regional and district open space.***
- 2) The WAPC acquire suitable land for district and regional level social infrastructure, as well as additions to the green network.***

4.2 Development and adoption of guidelines for active open space provision

Active open space development may be constrained by:

- Conflicts between multiple uses of POS land and utilities: power, sewer systems, drainage, power and gas services.
- Water sources allocated on a 'first come/first served basis', when a more equitable 'highest and best use' will assist with proper allocation and use for all services including for sports surface and recreational area irrigation.
- Competing and increased costs for infrastructure construction and operation, eg. power to buildings, recreational facilities and pumps. This raises issues for local governments with regard to user pay facilities in addition to rates paid.
- Past uses or nearby activities that limit the land's potential and maximise costs for remediation and/or development for recreational purposes.
- Limited long term planning for current and future community needs.

It is recommended that:

- 3) The Liveable Neighbourhoods review currently underway address public open space provision in the land development process and incorporate recent research conducted by the Centre for Sport and Recreation Research (October 2010) in the literature review stage.***
- 4) The Department for Sport and Recreation assist the WAPC to prepare a plan for district and regional active open space for the Perth and Peel Regions.***

- 5) *The Department for Water assist the WAPC with planning for water sources for irrigation of POS and the development of a model for equitable allocation of water licenses.*
- 6) *The WAPC review POS provision to correlate with housing densities.*
- 7) *The WAPC assist with funding the investigation and remediation of lands identified for recreational purposes.*
- 8) *Open Space associated with schools is excluded from calculations relating to available public open space.*

4.3 Provision of infrastructure – Outer sub region

The immediate concerns for the outer sub regions are:

- Inadequate provision of community and active open space to meet the current needs of the community.
- The inaccuracy of population forecasts for growth in outer metropolitan areas which means that demand for facilities is significantly ahead of provision.
- The provision of active open space competing with regionally significant biodiversity protection.
- Competition for land for recreational and social infrastructure that could also be developed for industrial or commercial centres to increase localised employment.
- Limited available ground water supplies for the development of active and recreational spaces.
- Limited planning for rationalising the provision of social infrastructure relative to centres.

It is recommended that:

- 9) *The WAPC funds a strategy for the adequate provision of POS and associated social infrastructure at a regional and district level in the outer metropolitan sub region.*

4.4 Review of infrastructure – Central metropolitan sub-region

The immediate concerns for the central metropolitan sub-regions are:

- Land and social infrastructure and services to support changing communities and their needs.
- Resourcing for retrofitting infrastructure to meet the needs of renewed communities.
- No additional POS or regional reserve locations are identified, despite the stated commitments.
- The Stirling Highway development relies on commuting employment and no additional accessible POS, social services or facilities are identified to support the proposed population increase.

- The smaller household trend requires new approaches to define social infrastructure required and POS relative to housing densities.

It is recommended that:

- 10) *The WAPC liaise with LGAs in the Central sub region to ensure adequate provision of open space and social infrastructure.*

5. CONCLUSION

Parks and Leisure Australia (WA Division) thanks the WAPC and *Department of Planning* for the opportunity to comment on the draft sub-strategies for this important planning tool. In our view, significant issues remain around the development of and access to regional and district open space and the effectiveness of *Liveable Neighbourhoods* to provide adequately for the provision of active open space.

While Directions 2031 is a land use planning tool which establishes the framework for community planning, without taking community and social issues into consideration the work will not deliver the expected outcomes. It is the view of PLA WA that there is a need for on-going discussion and consultation surrounding this important community issue. PLA WA is keen to offer assistance in this regard. In this, PLA is in a position to provide significant high level advice in the development of an integrated regional and district open space plan for the Perth and Peel regions.

6. APPENDIX ONE

Public Open Space Position Paper