

25 January 2016

Shane Downes
Manager Statutory Planning
Metropolitan Redevelopment Authority
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Dear Shane

Re Scarborough Redevelopment Scheme Review

Shelter WA welcomes the opportunity to provide a submission to the Metropolitan Redevelopment Authority (MRA) Draft Scarborough Redevelopment Scheme, Design Guidelines and Development Policies. Shelter WA is the peak body for social and affordable housing in Western Australia and is committed to ensuring accessible, affordable, appropriate and secure housing and the elimination of homelessness.

An adequate supply of social and affordable housing should be available across the whole Perth metropolitan area, particularly in strategic locations such as the Scarborough redevelopment area, which has a high degree of amenity.

Overall, Shelter WA is supportive of the MRA's vision for the Scarborough Redevelopment area, but suggests there can be improvements made to these documents, as noted below.

Development Policies

Policy 9: Diverse and Affordable Housing

Shelter WA is strongly supportive of the MRA's Diverse and Affordable Housing Policy, particularly the requirement affordable housing in developments of 20 units or more, which will be sold at construction cost to a housing provider approved by the MRA. We believe the target should be increased to 15% to provide an adequate quantity of affordable housing in the area.

The policy currently states that the affordable housing can be either social housing or affordable owner occupier housing, as part of a shared equity scheme. While some flexibility is needed to match housing need with housing type and tenure, it is important to retain at least 5% for social housing to ensure seniors, people with disability and other low income households are not excluded from the redevelopment area.

The cash in lieu option provides additional flexibility to developers and the MRA to ensure overall affordable housing goals are met within the Scarborough Redevelopment Area.

Shelter WA is also supportive of the housing diversity requirements, which will see the development of a range of housing sizes and specifications. This will assist in providing housing for a range of demographics, including those on low to moderate incomes.

Policy 10: Adaptable Housing

Shelter WA supports the MRA Adaptable Housing Policy, which seeks to ensure 20% of dwellings incorporate core Livable Housing Design Elements as advocated for by Livable Housing Australia. This will assist in meeting the changing needs of residents over their lifetime. Those with a disability, seniors, carers and people with small children increasingly find it difficult to locate appropriate housing. Requiring a proportion of adaptable housing in large scale redevelopments will ensure this is a consideration for developers.

Draft Scarborough Design Guidelines

Shelter WA commends the MRA for its Draft Scarborough Design Guidelines. The inclusion of a density bonus in the form of additional stories has the potential to lead to the development of affordable housing in addition to what is already required through the Development Policy 9: Diverse and Affordable Housing Policy.

Shelter WA further suggests that in mixed use developments, which are encouraged through the redevelopment area, commercial plot ratio bonuses could be offered for the provision of a percentage of affordable housing within the residential component of the development. This would create an affordable housing incentive that is more attractive to developers than the current residential plot ratio bonuses, which have only seen limited uptake in WA. The City of Canning has noted that commercial plot ratio bonuses can be an effective means of encouraging developer contributions for affordable housing in its Local Housing Strategy, as commercial land is generally more valuable than residential.

Draft Scarborough Redevelopment Scheme

Shelter WA recommends the MRA make the following additions to the Draft Scarborough Redevelopment Scheme (in bold) in order to support its stated goals of diverse and affordable living within the Scarborough Redevelopment Area:

- Amend Clause 2.2 ‘Delivering the Vision’ within the Scheme by revising the first sentence of paragraph 3 on page 14 to read: “The Scheme incorporates the requirements, provisions and opportunities to ensure sustainable growth and development, and includes important sustainability outcomes such as compact growth, mixed land use, good design, primacy of public spaces, heritage conservation, reduced car use and **affordable living, including the provision of diverse and affordable housing**”;
- Amend Clause 2.3.1 ‘Sense of Place’ bullet point 6 to read: “Liveability – A high quality of life is facilitated by accommodating a diversity of land uses, **housing typology and tenures**, services and social infrastructure in a compatible and complimentary manner, with high levels of amenity”;
- Amend Clause 2.3.2 ‘Economic Wellbeing’ bullet point 5 to read: “Live and Work – Deliver a diverse **and affordable** range of housing choices, providing the opportunity for people to live, work and play in Scarborough; and
- Amend Clause 2.3.5 ‘Social Inclusion’ sentence 1 to read: “To promote social inclusion by encouraging, where appropriate, a diverse **and affordable** range of housing, and by supporting community infrastructure, activities and opportunities for visitors and residents to socialise...”.

With these changes, the Draft Scarborough Redevelopment Area planning framework will be enhanced in its ability to promote social inclusion, diversity and affordable living opportunities within the Scarborough redevelopment area.

To discuss the issues raised in this submission in further detail, please don't hesitate to contact the writer on (08) 9325 6660 or eo@shelterwa.org.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Roberts', is centered on the page. The signature is fluid and cursive.

Chantal Roberts
Executive Officer