

Ms Gail McGowan  
Director General  
Department of Planning; Lands; & Heritage  
140 William Street  
Perth 6000

Dear Ms McGowan

**Re: Draft Planned or Managed Retreat Guidelines**

The Property Council welcomes the opportunity to provide feedback on the Draft Planned or Managed Retreat Guideline.

The Property Council represents more than 300 companies across WA in the residential, retail, retirement living, industrial and hotel sectors.

We have consulted widely with our members which include those that will be directly impacted by the implementation of this Guideline.

While industry is generally supportive of the WA Planning Commission's move to clarify how to effectively deal with property within an identified Hazard or Loss Zone (HLZ), there is significant concern regarding the Guideline's inclusion into local planning schemes, and the potential to deter infill development in prime coastal locations.

**Structure Planning**

The property industry is supportive of structure planning to be used as a method of coastal retreat in areas where some degree of comprehensive redevelopment of land remains an option. The inclusion of reasonable land requirements to accommodate coastal risk is also welcome.

**Local planning Scheme Amendments**

Industry has serious concerns over the requirement of a local planning scheme amendment. The industry feels that such a requirement will result in the changes, meant to be introduced into the HLZ will have further implications in unintended areas, restricting development will unnecessarily have negative impacts on the local council's ability to deliver on its infill targets. Industry would suggest changes to a specific area/structure plan is sufficient and will result in fewer unintended consequences.

## **Taking of Land**

The industry is supportive of the taking of land as a last resort when there is no further economic or social utility in the land due to coastal changes. The method outlined in the Guideline is adequate and provide enough advanced notice to the owner before and during the process.

However, every effort must be undertaken to ensure the owner is adequately compensated and the method of calculating valuation should be transparent and easily accessible to the public.

The triggers outlined for actioning the taking of land, appear fair and in the best interest of public safety.

## **Recommendations:**

- Remove the need for an amendment to the local planning scheme as the criteria could be applied outside of the desired area.
- Ensure the Guideline does not deter coastal infill development and redevelopment opportunities by ensuring the Guideline only applies to areas within a determined SCA.

The Property Council thanks you of the opportunity to provide industry feedback. Should you wish to discuss our commentary, do not hesitate to contact me on 08 9426 1200 or [liacomella@propertycouncil.com.au](mailto:liacomella@propertycouncil.com.au).

Yours Sincerely,

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

Lino Iacomella  
WA Executive Director

