



what was said about  
**Activity Centres for  
Perth and Peel**

State Planning Policy

report on submissions

November 2010



Department of  
**Planning**



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Published by the  
Western Australian Planning Commission  
Albert Facey House  
469 Wellington Street  
Perth Western Australia 6000

Published November 2010

ISBN 0 7309 9671 3  
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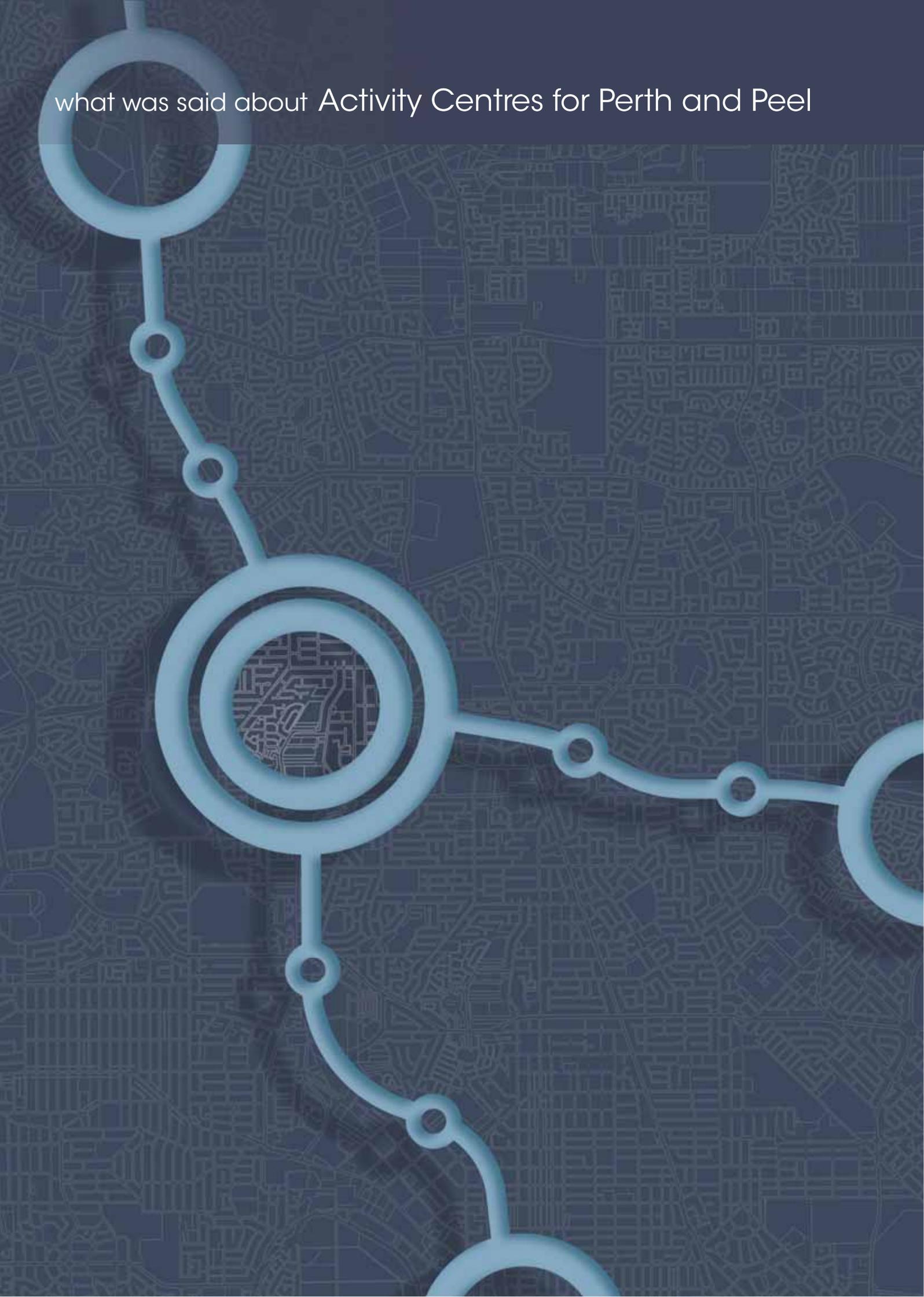
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# what was said about Activity Centres for Perth and Peel



# Section 1

## Introduction

The draft State Planning Policy 4.2 Activity Centres for Perth and Peel (the draft SPP) was advertised for public comment by the Western Australian Planning Commission (WAPC) from June – August 2009. The draft policy was the result of a review of the existing State Planning Policy (SPP) 4.2 Metropolitan Centres Policy Statement for the Perth Metropolitan Region.

Development of the final version of the Activity Centres Policy, which replaces and revokes the former SPP 4.2, has been informed by submissions received during the public comment period. The following report summarises:

- The key or most common issues raised in the submissions; and
- The more significant changes made to the Activity Centres policy in response to the submissions and comments received during consultation with stakeholders.

### Who was consulted?

The draft State Planning Policy- Activity Centres for Perth and Peel was released for public comment on 24th June 2009 for a two month period. As part of the advertising process, the Department of Planning (DoP) also held workshops which were attended by industry and local government representatives.

### Who responded?

A total of 106 submissions were received from local governments, retail organisations, property developers, planning consultants, government agencies and private individuals. The types of stakeholders are summarised Figure 1; local government, land owners and property developers accounted for the majority of submissions.

These submissions identified a wide range of issues with the advertised draft policy. To assist with analysis and reporting, these have been grouped and addressed under broad categories. Appendix 1 provides a summary analysis of each principal issue by identifying which of the 106 submissions raised the issue in question.

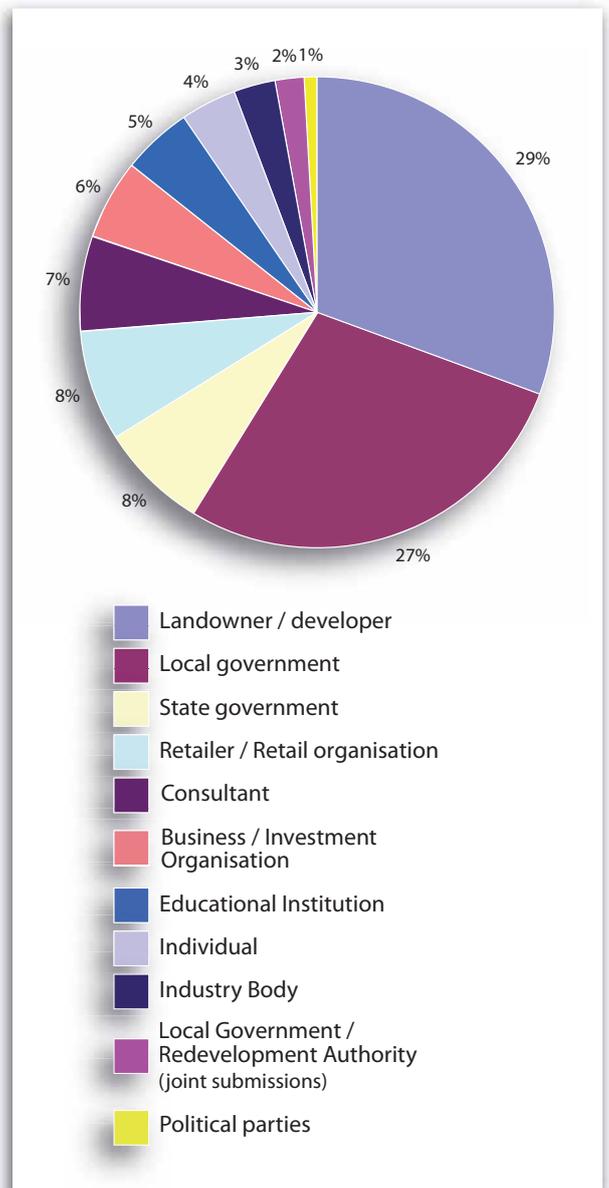


Figure 1: Submissions received on the draft Activity Centres Policy by stakeholder type

A stakeholder reference group was established to assist DoP to work through the issues arising from the submissions and develop changes to the draft policy, particularly focusing on implementation issues.

The stakeholder reference group comprised industry and local government representatives nominated by the Property Council, Urban Development Institute

of Australia, Shopping Centre Council of Australia and Western Australian Local Government Association, together with economic planning specialists.

## What was said - the principal issues

There was general support for the direction and underlying principles of the draft SPP, however, there were concerns about a number of the measures proposed. The recurring themes that emerged in submissions are:

- 1. Planning framework:** The relationship between the SPP and other WAPC policies, in particular *Liveable Neighbourhoods Element 7* and other elements of the statutory planning framework. It was suggested that an explanation of how elements of the SPP will integrate with the planning framework is required.
- 2. Policy objectives:** General support for the policy aims (objectives), subject to revised wording and better alignment with the policy provisions that are designed to give effect to these broad objectives.
- 3. Policy structure and mapping:** Submissions sought an improved policy structure and attention to those centres incorrectly located on the map in the draft SPP.
- 4. The activity centre hierarchy:** Submissions questioned whether some centres had been appropriately classified against the hierarchy in the draft policy, as well as its failure to recognise certain emerging or planned centres. While there was broad support for introducing the new tier of Primary centres, submissions questioned the number of primary centres; and the merit of elevating Joondalup and Rockingham over other major centres.
- 5. Definition and distinction of centres and retail floorspace:** The draft SPP did not provide sufficient distinction between the tiers of the centre hierarchy, with reference to their general functions and characteristics detailed in Table 2. Furthermore, the removal of most of the retail floorspace guidelines and the proposed 5,000m<sup>2</sup> net lettable area (nla) shop-retail floorspace guideline for both specialised and neighbourhood centres was raised as an issue.
- 6. Mix of uses and diversity of activity:** Submissions raised concerns regarding the definition and application of the 'mixed use threshold'.
- 7. Residential development:** Residential density targets for centres were generally considered conservative, although some submissions highlighted the challenges in achieving higher densities in centres in outer suburban or greenfields localities.
- 8. Mixed business and bulky goods outlets:** Concern was expressed about the recommended locations for, and accessibility requirements of bulky goods retail.
- 9. Industrial areas:** Submissions highlighted the limited recognition of industrial areas in the draft SPP.
- 10. Implementation and Model Centre Framework (MCF):** Many submissions were made in relation to the implementation issues associated with Centre Plans and the level of detail included in the MCF (Appendix 6 of the draft SPP).
- 11. Economic Impact Assessment:** Submissions questioned the scope and practicality of economic impact assessments as an assessment tool.
- 12. Other Implementation Issues:** Submissions also raised issues about the relationship between the draft SPP and local government planning instruments, and delegation under region planning schemes. Retail organisations questioned the appropriateness of the section on "Avoiding adverse tenure arrangements".
- 13. Boundary definition, zoning and activity corridors:** Concerns included:
  - lack of clear centre boundaries or boundary criteria for centres;
  - recommended Model Scheme Text zoning classifications; and
  - Minimal coverage of activity corridors and their relationship with activity centres; reflected also in the *Directions 2031* draft spatial framework.
- 14. Planning Land Use Categories (PLUC):** Submissions questioned the classification of uses with reference to the terminology used in the draft SPP.

# Section 2

## Discussion of the principal issues

### 1. Planning framework

Thirteen submissions were received with regard to the planning framework. A number expressed uncertainty regarding the integration of the SPP with the current/emerging planning framework, and in particular, its relationship to, and consistency with, *Liveable Neighbourhoods* (Element 7). Some submissions also highlighted a need to consider and reflect endorsed structure plans when finalising the policy.

In response to the issues raised regarding the role of the Activity Centres SPP within the planning framework, the following changes have been made:

- Section 3 (Application of the Policy) has been amended to include a graphic representation and explanation of the hierarchy of relevant planning policies and the statutory planning framework.
- District structure plans have been reviewed and a number of additional district centres have been included in the revised activity centre hierarchy.
- The relationship to Element 7 of *Liveable Neighbourhoods* and the use of the document in the preparation of plans has been clarified throughout the policy and Model Centre Framework. Element 7 of *Liveable Neighbourhoods* will need to be amended to incorporate certain provisions of the finalised policy.

### 2. Policy objectives

Whilst support for the policy objectives was expressed in a number of the submissions, some submissions advocated a closer relationship between activity centres and the future development of Perth's public transport facilities.

It was also considered that the draft policy objectives were statements of broadly accepted principles which did not connect sufficiently with the policy as a tool for implementation.

- The Policy Objectives have been reworded to better align with the policy provisions. The policy objectives are now organised under five general headings: activity centre hierarchy, activity, movement, urban form and out-of-centre development.
- An additional objective has been included in recognition of the public benefits associated with competition, namely, that "activity centres should be planned to support a wide range of retail and commercial premises and promote a competitive retail and commercial market."
- While the Policy does not cover all aspects of public transport in detail, the final policy incorporates strengthened policy measures to promote land use and public transport integration.
- The activity centres hierarchy is a structural element of the metropolitan spatial framework in *Directions 2031 and Beyond*. As such it is an important reference point in the development of the Draft Public Transport Plan by the Public Transport Authority.

### 3. Policy structure and mapping

Twenty two submissions were received in relation to the manner in which the policy contents were organised and mapping issues. Some submissions recommended that the layout/format of the policy be revised. Others highlighted centres incorrectly located on the centre map.

The Policy provisions in Section 5 have been reworded and re-arranged under the following six themes; these correspond generally to the structure of the revised Model Centre Framework:

1. Activity centre hierarchy
2. Activity (or land use)
3. Movement (or transport and parking)
4. Urban form
5. Resource conservation
6. Out-of-centre development

The map has been amended to ensure centre locations are correctly shown.

### 4. Activity centre hierarchy

Of the eighty five submissions received in relation to the activity centre hierarchy, fifty eight were concerned with the proposed classification of particular centres. A high proportion supported a particular centre's classification in the hierarchy, however, there were a number of submissions requesting centres to be re-classified.

Local governments and Redevelopment Authorities expressed concern regarding the omission of Midland, Armadale, Mandurah and Fremantle in particular from the primary centre designation. Submissions argued that they should be on par with Joondalup and Rockingham, given their strategic employment and service role for the inland sub-regions, and the existing and planned levels of public infrastructure investment.

Furthermore, a number of submissions expressed concern about the failure to recognise certain planned future centres and existing centres, and argued the policy should provide the potential for centres to advance up the hierarchy.

A review of the activity centre hierarchy as proposed in the draft policy was undertaken in conjunction with the review of *Directions 2031 and Beyond*, the spatial framework for Perth and Peel.

The activity centres hierarchy has been changed to reflect the final Directions 2031 document. These changes include:

- The recognition of ten strategic metropolitan centres. The Primary centres classification has been retained, however, there are no centres currently listed under this classification, and a statement has been included to foreshadow that some of the strategic metropolitan centres have the potential to warrant this higher-order classification in the future.
- The Regional Town Centres have been renamed 'secondary centres'.
- Strategic and regional specialised centres have been combined into one 'specialised centre' classification.
- The re-classification of a number of centres:
  - Ashfield - from secondary centre to district centre
  - Clarkson - from district to secondary centre
  - Port Coogee has been replaced by Cockburn Coast as a district centre;
  - Burswood re-classified from a secondary to a district centre<sup>1</sup>
  - Mandogalup was re-classified as a neighbourhood centre

<sup>1</sup> It is also classified as a "Metropolitan Attractor" under Directions 2031

- The consideration of submissions also resulted in the inclusion of an existing district centre omitted from the draft SPP (ie, Woodvale). Secondly, where structure plans had been endorsed and/or reached the point where the location of new district centres can be identified with sufficient certainty. These district centres are: Wungong, Albion, Wandi, Ravenswood (Riverfront), Newhaven (North Forrestdale) in addition to planned district centres in the Yanchep District Structure Plan area.
- Section 5.1 (Activity Centre Hierarchy) has been amended to explain that new Activity Centres over and above those identified in the Policy may be endorsed by the WAPC, subject to the policy principles.
- Section 5.1 has also been amended to recognise neighbourhood and local centres within the hierarchy and to re-iterate the importance of their community and retail functions.
- There is a general presumption against a centre “advancing” up the hierarchy independently from a future review of the Policy and it is stated that Activity Centre structure plans and development proposals should be consistent with the centre’s classification in the hierarchy. The exception to this principle is in relation to the Primary centre tier; a statement has been included to encourage the timely preparation of activity centre structure plans for Strategic Metropolitan Centres. This may assist a future State Government assessment as to whether the classification of a particular centre under the centre hierarchy should be upgraded.

## 5. Definition and distinction of centres and retail floorspace

The majority of the thirty submissions received in relation to retail floorspace welcomed the removal of the retail floorspace guide. Furthermore, in the instance where the floorspace guide was retained (5,000 m<sup>2</sup> nla for specialised and neighbourhood centres) submissions requested the floorspace guide be either increased or removed. Some submissions commented on the need to review the per capita guidelines on shopping floorspace in Section 6.1 of the draft SPP.

Twenty nine submissions were received regarding the definition of, and distinction between, centres. Most of these submissions raised concerns about the lack of clear distinction between the upper tiers of the centre hierarchy, with reference to stated functions and characteristics detailed in Table 2 of the draft SPP. Furthermore, reference was made to the limited distinction made between primary, strategic and regional centres in relation to transport, office and community uses, and typical retail functions. The City of Perth recommended certain functions and characteristics that could be included in Table 2 to distinguish the role of the Perth Central Area.

Submissions referred to the absence of residential density targets in Table 2 and mixed use thresholds in relation to Primary Centres.

Submissions argued that the proposed uniform distance-based retail catchments or “service population” areas used to differentiate centres within the hierarchy was inappropriate given significant variables of population density.

The need to amalgamate Table 2 and Appendix 2 was also raised in submissions which highlighted some duplication between Table 2 and Appendix 2.

Submissions also made reference to the disparate characteristics of the Specialised Centres and the need for the planning and development of these centres to be addressed on a more individual basis.

The table 'Guidelines on shopping floorspace supply' based on standardised per capita floorspace has been removed from the policy. It was considered this may be perceived as prescriptive and ignores the significant differences in spending power between retail catchments across the metropolitan region.

Table 2 (Table 3 in the final policy) has been amended by the following:

- A revised version of the Role and Function of the different centres in Table 2 and the deletion of Appendix 2. The 'typical attributes' have been amended to provide a clearer distinction between centres.
- "Residential density performance targets" and the associated "walkable catchments" for each type of centre have been included.
- A "diversity performance target" has been added to the table to replace the mixed use threshold.
- An indicative service population (trade) area for each centre type has been changed from a distance-based indicator to a broad population range, and the term 'typical service population access' deleted.
- Inclusion of Perth Capital City.
- Reference to the centre plan requirement has been removed from Table 2 and placed under the Implementation section **Section 6.4 Activity centre structure plans**.
- 'Specialised centres' have been removed from Table 2 and described separately in terms of their various strategic roles under **Section 5.1.1 Specialised Centres**.
- The typical shop-retail floorspace guideline of 5,000m<sup>2</sup> nla for neighbourhood and specialised centres has been removed.

## 6. Mix of uses and diversity of activity

Almost half of all submissions commented on the means by which the draft policy proposed to promote a greater diversity of uses (other than shopping) in larger centres. A significant number of submissions raised concerns about both the definition and application of the 'mixed use threshold' requirement proposed for strategic, regional and district centres, although the principle of diversifying centre functions was generally supported.

Significant issues in relation to the proposed mixed use policy provisions included:

- the use of the term 'mixed use' and the definition of 'mixed use threshold';
- the lack of clear centre boundaries, or boundary criteria; the way that centre boundaries are defined spatially in relation to the commercial centre will affect the amount of mixed use that can be provided in the centre;
- the policy should recognise the need for an increasing mix of uses as centre sizes increase i.e. smaller centres will be dominated by shop-retail development while the larger, upper tier centres may support a greater diversity of activities;
- apart from scale, the capacity of a centre to deliver non-retail uses depends on geographic, temporal and amenity factors. For example, it is unrealistic to expect much non-retail commercial floorspace in the initial phase of a "greenfield" centre's development;
- the policy should clarify whether the requirement for mixed use is applicable retrospectively or is only applicable to proposed expansions;
- residential development should be included in the mixed use threshold;
- market demand for non-retail uses may not coincide with the market cycle for retail;
- the numerical mixed use threshold should be abandoned in favour of a qualitative approach; and
- primary and specialised centres should also have a mixed use requirement.

In response to the submissions, the 'mixed use threshold' of the draft policy has been re-named a *diversity performance target* and a definition of the relevant uses for this target has been included ('mix of land uses'). A revised definition, 'mix of land uses', now includes a broader range of land use categories, namely:

- Office/business;
- Health/ welfare/ community services;
- Entertainment/ recreation/ culture (excludes outdoor areas); and
- Bulky goods retail / showroom.

*Liveable Neighbourhoods* (Element 7) includes guidelines for new activity centres designed to achieve mixed use "town centres" and which recommend a higher level of non-retail development than is proposed under the revised policy.

The Metropolitan Centres Policy includes a land use diversity guideline of 20 percent for regional and district centres. However, this is limited in its scope to offices and community uses and is below prevailing actual diversity levels of most developed centres. The current guideline needs to be updated into a more effective policy measure, however, it is also important to recognise the need for some flexibility in its application and the variable conditions of activity centres.

A revised statement has therefore been included in section 5.2.1 of the final policy that is designed to encourage greater land use (and associated employment) diversity in activity centre structure plans and, where appropriate, major developments. At the same time it is made clear that this is a guideline or target to be applied with regard to a centre's particular constraints and opportunities to incorporate such development.

It is recognised that, particularly for larger centres, the centre boundary and the mix of uses it contains usually extend beyond a single ownership. Therefore, Section 6.3.1 of the final

policy states: '*the centre boundary must contain sufficient land to deliver an appropriate degree of land use diversity, for the relevant type and scale of centre*'. The diversity performance target envisages that a mix of uses would generally be implemented in a staged manner, guided by an activity centre structure plan. This also addresses concerns regarding market conditions as they can be developed over time.

The diversity performance target has been included for strategic metropolitan centres in the final policy. However, it has not been included for specialised centres (for example, Jandakot and Perth Airport) due to their nature and functions.

Residential development has not been included within the diversity performance target as it is impractical to reliably measure the total floorspace of many dwellings. Retail, commercial, community and entertainment floorspace in centres is, however, periodically measured by DoP via the Perth and Peel Land Use and Employment Survey.

## 7. Residential development

Several submissions stated that the proposed housing targets were conservative and should be increased. Other comments related to the following:

- flexibility is needed in the application of housing targets to consider the local context;
- the 'walkable catchment' definition needs to be clarified; and
- the 'desirable densities per gross hectare' target conflicts with *Liveable Neighbourhoods*.

The housing density targets apply to the *walkable catchment* and have been increased. The policy has been amended to include residential density as a substantive policy provision (Section 5.2.2) and included as a performance target in Table 3. The appropriateness of the target for a particular centre will need to be assessed by the responsible authority. The definition of *walkable catchment* has been simplified.

The revised targets are broadly consistent with Commission's DC policy 1.6 *Planning to Support Transit Use and Transit Oriented Development*, when the significant differences between gross and nett densities are taken into account. A footnote to Table 3 in the final policy explains that the average R Code (or nett density) equivalent is two to three times the number of dwellings per gross hectare.

*Liveable Neighbourhoods* will need to be brought into line with this aspect of the Activity Centres policy, although the differences are not major.

## 8. Mixed business and bulky goods outlets

There were twenty two submissions in relation to mixed business and bulky goods. Concerns were raised about the location, control and accessibility requirements of bulky goods retailing operations. Reference was made to the fact that bulky goods retailing generally involved the use of private vehicles (rather than public transport), generally involves co-location with other similar bulky goods outlets (to facilitate comparison shopping) and requires relatively large sites.

Other issues in submissions include the following:

- Bulky goods should be located on activity corridors;
- Appropriate definitions are required for bulky goods/large format retailing;
- The location of bulky goods retailing in industrial zones; and
- 'Bulky goods retail' should be introduced as a stand alone retail use in the mixed use threshold

Section 5.6.1 (Bulky goods retailing and mixed business) of the final policy has been amended in response to the issues raised in the submissions. A new provision has been included to more clearly differentiate shop-retail from bulky goods. Further product categories have been included to bring WA's planning definition of bulky goods more into line with definitions used in other States. The definition is subject to refinement as part of the proposed review of the Model Scheme Text.

The draft policy was considered overly prescriptive in seeking to confine future bulky goods retail to the "edge" precincts of activity centres. The final policy recommends that local planning schemes restrict the permissibility of bulky goods retail in industrial zones, but acknowledges the need for this form of retailing in appropriately located mixed business or equivalent zones.

This approach recognises the necessity for some out-of-centre locations, while reducing the dispersal of bulky goods retail throughout industrial zones. The final policy's recommended locations in priority order are:

- 'edge-of-centre' sites;
- sites adjacent to established and well-located bulky-goods nodes; and,
- other suitable sites (in exceptional cases), where sufficient sites in, or adjacent to, activity centres or established bulky-goods nodes are not available.

The policy recommends that local government undertake strategic planning by assessing future bulky goods floorspace demand via local planning (commercial) strategies and by identifying sufficient and suitable land in local planning schemes and structure plans.

Bulky goods have been included in the 'mix of land use' category so as to encourage provision to be made in edge precincts of larger centres, as this is preferable to their proliferation throughout industrial zones.

## 9. Industrial areas

There were thirteen submissions in relation to industrial areas. Concern was expressed about the limited recognition of industrial areas in the draft policy, particularly in light of the proliferation of retail and commercial development in these areas over a long period. Other submissions argued for a separate Industrial Activity Centres Policy.

Industrial areas are not regarded as “urban” activity centres, which is the focus of the policy. A reference is included to explain the scope of the policy in relation to industrial areas. This is essentially to recommend constraints or limits to the extent to which retail and commercial development should be permitted to locate in industrial zones. The policy’s focus is instead to concentrate such development in activity centres.

A new sub-section 5.6 (Out of centre development) has been included to limit the extent to which such uses are able to locate in dispersed, out-of-centre locations. The provision is directed at larger-scale health, welfare, community services, entertainment, recreation, commercial and cultural facilities that regularly generate a significant number of vehicle trips. The intent is that local planning schemes generally should direct such uses to established Mixed Business-type zones or, ideally, sites in or next to activity centres.

## 10. Implementation and model centre framework

### Centre Plans (Section 6.4 Draft) and Model Centre Framework (Appendix 6 Draft)

Eighty submissions expressed concern about the proposed requirements and aspects of Centre Plans and the role and level of detail in the Model Centre Framework (MCF). The main issues were:

- responsibility for the preparation of centre plans, both between property owners and local government and among owners in the case of centres in multiple ownership;
- resource/cost implications for the preparation of centre plans and the potential constraint to development in the absence of a centre plan;
- the need to recognise existing centre plans and strategies which already satisfy the new policy principles;
- the need for procedures to guide the preparation and endorsement of centre plans;
- the complexity of the assessment of centre plan checklist (135 compliance items). Submissions suggested a focus on high order principles appropriate to a state level policy. There is a need to allow more flexibility for urban design principles to be applied appropriately to each local context and reduce the rigidity of the policy guidance;
- the failure of the policy to recognise the importance of local setting and account for local context in centre planning, and the need to recognise that street-oriented development may not be suitable in all circumstances;
- a lack of recognition afforded to internal-mall centres and the preoccupation with main street centre form, whereas the MCF should give greater guidance on the common problem of retrofitting existing suburban shopping centres.
- the need to address the wider policy context influencing the activity centre planning, with suggestions including the need to reference established design principles for transit orientation, crime prevention and sustainable development.
- a level of uncertainty as to where the draft SPP will sit in the Commission’s current/emerging policy structure, in particular its relationship to (and consistency with) *Liveable Neighbourhoods*;
- the role of local planning strategies should be made clearer, for example, to refine housing density targets, as well as the demarcation of centre boundaries.
- there was some support for the mechanism of Centre Plans to facilitate land use diversity, tempered by a concern over ‘forcing’ the market to deliver non-retail development ahead of demand.

- it was also pointed out that some elements would not be well accommodated in all centres. For example the requirement for centre layouts to match the existing street grid, as this may be too fine or too large.
- Difficulties in achieving housing density around some centres as the walkable catchment of existing ('box') centres often contains car parking and road infrastructure.
- some submissions argued the merits of box centres, such as the benefits of their nature (indoor, air-conditioned etc) which highlight their consumer popularity.

Section 6.4 of the final policy has been amended to more clearly describe the type and scale of activity centre requiring a structure plan. A section has also been modified to clarify who should be responsible for the preparation of centre plans and the planning authority responsible for endorsing the plan. The policy has been amended to allow for local government and, where appropriate, landowners to prepare activity centre structure plans for strategic metropolitan, secondary, district, and specialised centres. This is to overcome the issue of limited local government resources and the need to allow for development to progress.

The final policy will align with the Department's related policy reform work currently in progress that will establish industry standards for the scope, structure and content of structure plans generally. These standards will be contained in proposed Structure Plan Preparation Guidelines.

A sub-section (6.4.3) has been added to summarise the recommended content of structure plans and list general performance indicators for each key element to assist their assessment.

As outlined in the final policy, activity centre structure plans should be endorsed prior to a "major development" being approved. However, in order to allow for exceptional circumstances

(in the absence of an endorsed activity centre structure plan), the policy would require such major development to satisfy relevant requirements of the MCF.

The section has also been amended to state that, due to the importance of strategic metropolitan centres, structure plans are expected to be adopted within 3 years from the policy's finalisation. The status of these centres and their potential as possible primary centres may be reviewed in line with this requirement.

The final policy explains that an existing endorsed structure plan will remain effective in the interim until an activity centre structure plan is endorsed pursuant to this policy.

The MCF and assessment checklist have been substantially revised. Section 1.1 describes its role is to provide guidance on the preparation of activity centre structure plans. A graphic has also been included to show the key documents that need to be considered in the preparation of a plan. The content of the document has been substantially reduced into a more legible structure in which chapters correspond to each section of the main policy itself. Each chapter lists the relevant planning considerations and plan requirements to be addressed in a structure plan.

Section 2.2 of the final MCF provides more emphasis on the importance of considering local context, to highlight the need to prepare area-specific activity centre structure plans. A new chapter has also been included at the end of the framework to provide advice on the implementation of a centre plan.

The MCF has been amended to include reference to existing centres and the need to ensure that an enclosed mall should only be a small portion of the total centre. The "sleeving" of large scale retail formats with smaller tenancies and the introduction of external facing uses to avoid blank walls is encouraged.

The number of items in the assessment checklist has been reduced, as has the level of detail in pursuit of a more useful and succinct policy guidance document to facilitate the production of activity centre structure plans.

## 11. Economic Impact Assessment

There were forty four submissions in relation to the policy requirement for the preparation of Economic Impact Assessments (EIA). Whilst there has been a degree of support for the role of economic impact assessments in policy implementation, some concerns were expressed about the scope and practicality of the assessments.

The major issues and opinions raised in submissions were:

- need to clarify responsibility for EIA in the case of centres in multiple ownership, e.g. main street scenarios;
- the EIA requirement is too broad and will impose significant costs and potential delays on shopping centre developments.
- an EIA should only be required if a proposed development may amend the centre hierarchy
- the need to set out the circumstances or thresholds at which an EIA is required, and also exemptions. In particular, recognition that developments should be exempt from any requirement to prepare an EIA when they were consistent with approved strategies and plans;
- the need for clear criteria against which assessments are to be evaluated, including assumptions about the future development/expansion of other centres.;
- Local governments do not necessarily have the time, expertise or resources to assess EIA;
- concern that nominal or indicative catchments based on distance may be applied literally, when in fact there are several variables that determine

the size of centre catchments such as competing centres, geography, population densities and socio-economic factors;

- some submissions expressed concern that the removal of the standard retail guidelines and use of new EIA guidelines will lead to uncertainty in the development sector;
- others supported the use of EIA and structure plans as alternative planning tools
- the definition of 'major development' should be expanded beyond retail to include a range of non-retail uses;
- queries as to which social and environmental impacts might be considered within an EIA scope - social impacts should be considered in the broad context only;
- the need for clear and concise guidelines about how EIAs are prepared and what they should contain, including defined criteria on methodology and data sources. It was suggested that a model EIA should be prepared to demonstrate the relevant components for consideration together with an assessment checklist to ensure consistent implementation.

Economic Impact Assessment has been renamed Retail Sustainability Assessment (RSA) as this communicates the importance of a triple bottom line approach and promotes consideration of economic and environmental sustainability and community benefits. The revised policy confirms that the basic scope and purpose of these assessments is focused on retail, in response to concerns that the scope outlined in the draft SPP was too open-ended;

Supporting practice guidelines will be prepared to set out more detailed guidance on the parameters for a RSA. These guidelines aim to improve the consistency and transparency of assessment methods, the reliability of retail model outputs and restrict the use of overly technical or obscure methods.

Clear thresholds are set as to when a development or activity centre structure plan needs to be supported by an RSA process. An RSA is required for *major developments*, and scheme amendments or structure plans that provide for *major developments*. The largest neighbourhood centres (above 6,000m<sup>2</sup> in total retail size) and those which propose an expansion of more than 3000m<sup>2</sup> would also need to be justified by an EIA.

Exemptions to the EIA requirement include:

- where the proposed shop-retail floorspace is substantially within the walkable catchment of a passenger rail station, the responsible authority may waive the RSA requirement;
- where an endorsed local planning (commercial) strategy, district, local or activity centre structure plan includes an indicative amount of shop-retail floorspace derived from a retail needs assessment, a RSA should only be required where a significant increase to this shop-retail floorspace is proposed; and
- proposals in strategic metropolitan, neighbourhood (subject to the above requirements) and local centres do not require a RSA.

Other changes include the replacement of the geographic limits on catchments with indicative limits on a catchment size based on a broad population range. This measure recognises variables such as population density and spending power and allows for new centres to be delivered as populations grow.

It was not deemed appropriate to include other non-retail uses in the definition of 'major development'. The focus of the policy is for larger centres to develop as mixed use centres that accommodate a range of uses (and employment) in addition to shopping. The policy recognises that major retail development remains a significant driver for other forms of development within centres and it was not considered appropriate to require impact assessments for other forms of land use.

Major (retail) development is also the trigger for an activity centre structure plan. The policy is designed to ensure that major retail development occurs within the framework of a structure plan, whilst also considering impacts on other relevant activity centres.

Draft RSA Guidelines are to be developed and advertised for public comment once the Final Policy is released.

## 12. Other Implementation Issues (Section 6 Draft)

There were 47 submissions which raised questions about various other issues regarding implementation of the policy, including:

1. uncertainty regarding the requirements necessary to implement the policy;
2. a lack of recognition in the draft SPP of existing local planning schemes, local planning strategies and local commercial strategies.
3. the purpose and appropriateness of section 6.6.2 (Avoiding adverse tenure arrangements).
4. clarification of WAPC region scheme approval requirements.

A graphic has been included in the implementation section outlining the key strategic and statutory planning processes and requirements that will be applied to implement the policy. The section has been restructured to reflect the graphic into:

- Regional planning
- Local planning strategies
- Local planning schemes
- Activity centre structure plans
- Retail sustainability assessment
- Development control

Section 6.2 (Local Planning Strategies) states that Local Housing Strategies and Commercial Strategies should be progressively brought into line with the policy.

The delegation arrangements are to be revised, with the range of retail developments needing the WAPC's separate development approval under the Metropolitan or Peel region scheme being reduced in light of proposed planning reforms, specifically the creation of Development Assessment Panels (DAPs).

The section in the draft policy stating that planning decision-making should avoid supporting adverse tenure arrangements has been removed. This draft policy statement was confusing; and the public benefit in ensuring that major retail operators do not seek to prevent competitor retail businesses from establishing in the same centre is more appropriately addressed under Competition legislation. The Australian Competition and Consumer Commission has in the meantime implemented reforms at a national level that will see restrictive supermarket lease provisions being phased out over the next five years.

The Department of Planning currently has two pilot projects (Stirling Highway and Scarborough Beach Road) to progress the policy concept and develop planning guidance for urban corridors. Urban corridors will therefore not be included in the final policy.

centres comprising multiple individually-owned sites, e.g. in a main street scenario. Submissions raised the need to clearly define centre boundaries and the responsibilities of local government and the WAPC. Other issues raised were:

- that guidance is required on the application of the Model Scheme Text zoning classification to the activity centres hierarchy; and
- that the delineation of centre boundaries will affect the amount of mixed use that can be provided in the centre.

The final policy has included a 'defining activity centre boundaries' section in Section 6.3 (Local Planning Schemes) and includes the factors to be considered when defining a centre boundary; the centre boundary must contain sufficient land to deliver an appropriate degree of land use diversity for the relevant type and scale of centre. It is stated that 'unduly elongated centre form or "corridor" type centres will generally not be supported'.

Section 6.3 recommends that local planning schemes be amended to incorporate zoning classifications (from the Model Scheme Text Guidelines) to be applied to activity centres. These types of zones, in conjunction with structure plan requirements, are intended to promote a "place-based" approach to detailed planning and development control and enable a desirable mix and integration of various land uses, rather than an approach which zones land based on the separation of land uses.

### 13. Boundary definition, zoning and urban corridors

Eleven submissions raised issues related to activity corridors. The term 'urban corridors' is proposed to replace 'activity corridors' and is consistent with Directions 2031. Neither urban nor activity corridors, however, were addressed in the draft policy. Submissions requested that activity corridors be included as a key component of the policy, together with the designation of particular activity corridors and a set of criteria to guide appropriate development within these corridors.

Eleven submissions raised issues in relation to boundary definition and zoning. Some concern was expressed regarding potential anomalies between zoning and land use boundaries and the difficulties in administering development guidelines and controls in the case of

## 14. Planning Land Use Categories

Eight submissions were received in relation to Planning Land Use Categories, raising questions and concerns about the classification of uses according to the terminology used in the draft policy, e.g. shop-retail, commercial floorspace, community floorspace. Related to these questions are the Planning Land Use Categories (PLUC) used in the commercial and industrial surveys over past decades.

The policy has been amended to delete Appendix 2 and retain only a basic reference to the 'Planning Land Use Classification 5 (Shop-retail)'. This anticipates that the detailed composition of the PLUC 5 classification will be revised in the future, but avoids the need for the policy itself to be amended to accommodate any detailed changes.

# Appendix 1

## Submissions received by issue

Issues	Submission reference	No of submissions
1. Planning framework	31,44,52,53,54,56,67,68,74,75,82,89,103	13 submissions
2. Policy objectives	7,11,13,18,20,25,26,29,38,40,43,49,50,52,53,55,60,61,62,63,68,74,75,77,81,82,85,91,92,93,94,96,100,102,103,105	36 submissions
3. Policy structure & mapping	2,13,20,27,28,31,39,45,49,50,51,53,56,64,66,71,79,81,82,84,85,91	22 submissions
4. Activity centre hierarchy	2,3,13,17,25,29,36,42,49,51,53,56,61,62,63,64,65,66,68,69,80,83,91,93,94,102,105	27 submissions
Classification/designation of centres	4,6,11,13,14,15,16,17,20,25,28,30,33,34,35,37,38,39,40,41,42,43,44,45,46,47,48,49,50,51,52,57,58,60,61,62,67,72,75,76,78,80,81,83,86,87,88,90,93,94,95,96,97,98,99,102,103,105	58 submissions <b>Total: 85 submissions</b>
5. Definition and distinction of centres	4,5,15,20,22,25,26,35,36,38,40,49,50,60,61,62,64,78,80,81,83,91,92,93,94,95,102,103,105	29 submissions
Retail floorspace	3,5,7,9,11,13,16,22,24,25,27,28,30,34,35,36,38,42,49,50,52,57,62,65,66,74,78,79,83,85	30 submissions <b>Total: 59 submissions</b>
6. Mix of uses and diversity of activity	3,4,5,6,7,9,11,15,16,20,22,23,26,27,29,33,34,35,36,39,40,42,49,50,51,52,58,59,61,62,63,64,65,66,68,69,71,73,74,78,79,80,81,83,84,85,90,92,94,98,103	51 submissions
7. Residential development	6,9,13,15,20,22,23,25,26,27,28,34,36,37,39,40,49,52,55,57,59,61,62,64,65,66,71,79,83,84,85,87,94,95,100,105	36 submissions
8. Mixed business and bulky goods	4,9,19,20,25,27,36,38,50,51,64,65,66,81,82,83,85,89,90,92,101,106	22 submissions
9. Industrial areas	6,9,20,28,32,36,42,52,53,58,91,92,102	13 submissions
10. Implementation and model centre framework	1,2,3,4,5,6,7,8,9,11,12,13,14,15,20,21,22,23,24,25,26,27,28,29,30,33,34,35,36,37,38,39,40,42,48,49,50,51,52,53,54,55,57,59,61,62,63,64,65,66,67,68,69,70,71,73,74,76,77,78,79,80,81,82,83,84,85,87,88,90,91,92,93,94,95,98,100,103,104,105	80 submissions
11. Economic Impact Assessment	3,4,6,7,9,14,15,20,21,22,24,25,27,29,33,34,35,38,39,40,42,48,49,50,52,58,59,61,62,69,70,71,73,78,80,82,83,84,85,87,92,94,100,103	44 submissions
12. Other implementation issues	4,11,13,14,15,19,20,22,23,24,25,26,27,28,29,33,34,36,37,38,39,48,49,50,51,54,55,62,63,64,65,66,68,77,79,80,81,82,83,85,87,91,92,94,98,102,103	47 submissions
13. Boundary definition & zoning	5,11,20,36,49,58,68,79,81,88,103	11 submissions
Activity corridors	10,40,55,69,87,89,92,94,96,98,104	11 submissions
14. PLUC	4,9,24,33,34,35,81,103	8 submissions

## Appendix 2

### Submissions Register for Draft Activity Centres Policy

Issues	Submission reference	No of submissions
1	Katherine Devlin	<b>Individual</b>
2	Melanie Bradley	Individual
3	Retail Traders' Association of W.A.	Retailer/Retail Org
4	Town of Kwinana	Local Government
5	Town of Victoria Park	Local Government
6	City of Bayswater	Local Government
7	Committee for Perth	Business/Investment Org
8	Dean Cracknell	Individual
9	PLANWEST	Consultant
10	Mike Wright	Individual
11	Murdoch University	Educational Institution
12	Housing Industry Association	Industry Body
13	Rockingham Kwinana Development Office	State Government
14	Town of Vincent	Local Government
15	City of Cockburn	Local Government
16	Curtin University represented by MGA Town Planners	Educational Institution
17	Tah Land Pty Ltd represented by Hotchkin Hanly Lawyers	Landowner/Developer
18	City of South Perth	Local Government
19	Bulky Goods Retailers Association	Retailer/Retail Org
20	City of Rockingham	Local Government
21	City of Belmont	Local Government
22	AMP Capital Investors	Business/Investment Org
23	Fabray Pty Ltd represented by TPG	Landowner/Developer
24	Jandakot Airport Holdings Pty. Ltd represented by TPG	Landowner/Developer
25	City of Swan	Local Government
26	Westfield Ltd	Retailer/Retail Org
27	Shopping Centre Council of Australia	Retailer/Retail Org
28	City of Wanneroo	Local Government
29	GREENS WA -Lynn McLaran,MLC	Political Party
30	Yanchep Beach Joint Venture	Landowner/Developer
31	Atlantis Cove Pty Ltd represented by TBB	Landowner/Developer
32	Landcorp represented by TBB	State Government
33	Colonial First State Global Asset Management represented by TBB	Business/Investment Org
34	Vogue Marketing and Syndication Pty Ltd represented by TBB	Landowner/Developer
35	Perron Group Ltd represented by TBB	Business/Investment Org
36	City of Perth	Local Government
37	Yaran Property Group	Landowner/Developer

Issues	Submission reference	No of submissions
38	City of Fremantle	Local Government
39	City of Joondalup	Local Government
40	City of Stirling	Local Government
41	Port Bouvard Ltd represented by Greg Rowe & Associates	Landowner/Developer
42	Tim Auret	Consultant
43	Della Vedova Family represented by Development Planning Strategies	Landowner/Developer
44	Yanchep Beach Joint Venture represented by Mike Allen Planning	Landowner/Developer
45	Atlantis Cove Pty Ltd represented by Mike Allen Planning	Landowner/Developer
46	Primejade Holdings Pty Ltd represented by Shrapnel Urban Planning	Landowner/Developer
47	Tah Land Pty Ltd represented by Shrapnel Urban Planning	Landowner/Developer
48	ING Real Estate Development Australia	Landowner/Developer
49	City of Melville	Local Government
50	City of Armadale	Local Government
51	ING Real Estate Development Australia	Landowner/Developer
52	Satterley Property Group	Landowner/Developer
53	Urban Design Centre	Educational Institution
54	Water Corporation	State Government
55	DG Disability Services Commission	State Government
56	IGA Distribution Pty Ltd	Retailer/Retail Org
57	City of Gosnells	Local Government
58	Town of Bassendean	Local Government
59	Chappell Lambert Everett	Consultant
60	AMP Capital Investors represented by Greg Rowe & Associates	Business/Investment Org
61	Wanneroo Centre P/L represented by Greg Rowe & Associates	Landowner/Developer
62	Waterford Plaza Shopping Centre represented by Greg Rowe & Associates	Landowner/Developer
63	Coles represented by Planning Solutions	Retailer/Retail Org
64	Roberts Day	Consultant
65	Ellenbrook Joint Venture represented by Roberts Day	Landowner/Developer
66	Fini Group represented by Roberts Day	Landowner/Developer
67	Tokyu Corporation represented by Roberts Day	Landowner/Developer
68	Taylor Robinson	Consultant
69	Town of Cambridge	Local Government
70	Brookfield Multiplex represented by Chappell Lambert Everett	Landowner/Developer
71	Satterley Property Group represented by Chappell Lambert Everett	Landowner/Developer
72	City of Armadale & Swan and Armadale and Midland Redevelopment Authority	Local Gov & Redevelopment Authority
73	Hawaiian	Landowner/Developer
74	Banksia Grove Development Nominees represented by Chappell Lambert Everett	Landowner/Developer
75	Town of Claremont	Local Government
76	Main Roads	State Government
77	South West Group	Local Government

Issues	Submission reference	No of submissions
78	City of Canning	Local Government
79	Planning Institute of Australia	Industry Body
80	North West District Planning Committee	Local Government
81	Midland Redevelopment Authority	State Government
82	Serpentine Jarrahdale Shire	Local Government
83	Stockland WA Development Pty Ltd	Landowner/Developer
84	Owners of Lot 313 Anktell Road represented by Greg Rowe & Associates	Landowner/Developer
85	Property Council of Australia	Industry Body
86	Swan Chamber of Commerce	Business Organisation
87	Shire of Murray	Local Government
88	City of Nedlands	Local Government
89	BMC Properties represented by Taylor Burrell Barnett	Landowner/Developer
90	City of Armadale and Armadale Redevelopment Authority Joint Submission	Local Gov & Redevelopment Authority
91	HASELL	Consultant
92	Taylor Burrell Barnett	Consultant
93	Department of Sport and Recreation	State Government
94	Western Australian Local Government Association	Local Government
95	Australand Properties represented by Taylor Burrell Barnett	Landowner/Developer
96	Dept of Housing represented by Taylor Burrell Barnett	State Government
97	Walker Corporation represented by Macroplan	Landowner/Developer
98	Eastern Metropolitan Regional Council (EMRC)	Local Government
99	Belmont Park Racecourse Redevelopment represented by Development Planning Strategies	Landowner/Developer
100	City of Subiaco	Local Government
101	Officeworks	Retailer/Retail Org
102	Planning and Transport Research Centre	Educational Institution
103	City of Mandurah	Local Government
104	Tokyu City and Denkey represented by Greg Rowe & Associates	Landowner/Developer
105	University of Western Australia	Educational Institution
106	Bunnings	Retailer/Retail Org