

Submission Table

Submitter No.	Assess No.	Submission	City's Response
1.	Element on behalf of Hawaiian	<ol style="list-style-type: none"> 1. Element act on behalf of Hyde Park Management Ltd, being the landowner Hawaiian's Forrestfield located at Lot 102 Strelitzia Avenue and Lot 109 Hale Road, Forrestfield. 2. Element are engaged to provide a submission on the Activity Centres Strategy (ACS). element and Hawaiian have also met with the City of Kalamunda to assist in the preparation of this submission. 3. District Centre Classification and Shop / Retail Floorspace - The designation of Hawaiian's Forrestfield as a District Centre under the Strategy is supported. It is noted under State Planning Policy 4.2 Activity Centres for Perth and Peel (SPP4.2) a District Centre is assigned retail floor space NLA of 20,000m2. 4. The ACS indicates that floorspace for the Forrestfield District Centre is anticipated to be 17,000m2 by 2036. The ACS recommends at Clause 4.6 Table 5 that this floorspace figure be applied. It is noted that the 17,000m2 spans across Hawaiian's Forrestfield as well as adjoining properties fronting Hale Road. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. Noted. 4. Noted. 5. ACS updated to state that expansion to 20,000m2 may be considered in the long term. 6. See response 5. 7. Allocation of additional floorspace to be considered during the preparation of the Forrestfield Activity Centre Plan (FACP). 8. To be considered during budget considerations for 2021/22. 9. Noted. 10. To be considered during the preparation of the FACP. 11. To be prepared as part of the FACP. 12. Noted. 13. Noted. 14. Commentary on 'out-of-centre development' included within the Strategy. Out-of-centre-development generally subject to RSA and will be considered at the various planning phases (scheme amendments, structure plans, development applications etc). The Strategy has

		<p>5. Hawaiian consider that the floorspace for the Forrestfield District Centre should reflect the 20,000m2 provided for a District Centre under SPP4.2. That is, table 5 of SPP4.2 requires an Activity Centre Structure Plan when shop/retail floorspace exceeds 20,000m2 NLA. It is therefore requested that the indicative floorspace for the Forrestfield District Centre be increased to 20,000m2.</p> <p>6. This will allow for expansion of the Forrestfield District Centre to 20,000m2 to the requirement of SPP4.2 without being inconsistent with the recommendations of the ACS.</p> <p>7. It is further requested that this floorspace in allocated to Hawaiian's Forrestfield to allow for shop / retail expansion in a coordinated and consolidated manner.</p> <p>8. Activity Centre Plan - The ACS advises that an Activity Centre Plan (ACP) is proposed to be prepared in 2021 / 2022 for the Forrestfield District Centre. It is understood pending budget allocation that the ACP should commence preparation mid 2021 with an external consultant to be engaged to prepare the ACP.</p> <p>9. Hawaiian supports the preparation of an ACP for the Forrestfield District Centre and surrounding locality. It is considered that given the demographic analysis undertaken as part of the ACS indicates 25% population growth to 2036 for Forrestfield that an ACP is critical in</p>	<p>also included an action for the investigation of the need for a policy to guide (amongst other things) assessment of 'out-of-centre' development.</p> <p>15. See response 14.</p> <p>16. Noted.</p> <p>17. See response 14. Guidelines for the requirements of a RSA have been included within the Strategy. The Strategy has also included an action for the investigation of the need for a policy to guide (amongst other things) RSA requirements.</p> <p>18. Noted.</p> <p>19. See response 17.</p> <p>20. Noted.</p> <p>21. See response 17.</p> <p>22. Noted.</p> <p>23. Noted.</p> <p>24. Noted.</p> <p>25. The City will take this into consideration during any consultation with MRWA on the Tonkin/Hale intersection.</p> <p>26. Noted, see responses above.</p> <p>27. Noted.</p>
--	--	---	---

		<p>ensuring that a framework is in place to allow for the expansion of the Forrestfield District Centre.</p> <p>10. Increased residential densities should be considered surrounding the Forrestfield District Centre as part of the ACP preparation. Increased residential densities will assist in supporting the ongoing vibrancy viability of the Forrestfield District Centre by providing greater residential catchment. This is particularly important given the likelihood of competing Centres, such as Forrestfield North, being established in the short to medium term.</p> <p>11. As part of the preparation of the ACP a retail sustainability assessment (RSA) is required to be prepared in accordance with SPP4.2. The RSA will inform the extent of shop / retail floorspace that is sustainable within the Forrestfield District Centre. It is considered that the shop / retail floorspace specified in the ACS should be considered as a guide at this juncture, and the RSA inform the final shop / retail floorspace for the Forrestfield District Centre. The RSA will provide a more detailed and focussed assessment relevant to the Forrestfield District Centre. In this regard, is understood that with the preparation of the Kalamunda District Centre ACP that the shop / retail floorspace outcome was more than initially envisaged.</p>	
--	--	--	--

		<p>12. Given that Hawaiian is likely to be the major landholder affected by the preparation of the ACP it is requested that early engagement with the City and appointed consultant is undertaken.</p> <p>13. Out of Centre Development - Hawaiian owns and manages a number of Shopping Centres throughout the Perth Metropolitan Region.</p> <p>14. Recently, a number of out of centre developments have been proposed in the vicinity of Hawaiian Centres. As an example, within the City of Kalamunda, the Outline Development Plan (ODP) amendments being sought to the Wattle Grove Urban Cell U9 ODP are a significant concern. The amendments propose to modify the designated zoning of Lots 192, 193 and 194 (No. 310, 318 and 326) Hale Road, Wattle Grove from 'Mixed Use' to 'Commercial' to facilitate a significant increase in shop/retail floorspace. This proposal has the potential to undermine the established activity centres.</p> <p>15. Out of centre development has the potential to impact upon the established hierarchy of activity centres and result in the loss of quality of service and diversity of uses. Out of centre development dilutes and disperses the concentration of such uses external to activity centres. Loss of quality of service offer within a Shopping Centre leads to degradation and less</p>	
--	--	---	--

		<p>attractive Centres as landowners are discouraged from investment.</p> <p>16. Recently, Hawaiian has experienced the approval of a full line supermarket and specialty stores totalling approximately 3,500m² shop / retail NLA and 6,500m² floorspace (in total) within 800m and 1.3km of two District Centres, including Hawaiian's Mezz Shopping Centre. The approval of this proposal is estimated to have a financial impact of \$7.2 million on Hawaiian's Mezz Shopping Centre and a \$42.0 million impact on surrounding Centres. The above-mentioned proposal took advantage of a shop being a permitted use in the Commercial zone, where the Commercial zone was not intended to facilitate shop / retail floorspace to the equivalent of a stand-alone Neighbourhood Centre.</p> <p>17. It is requested that the City consider that where a shop use is a permitted use outside of defined activity centres that limitations on shop / retail NLA floorspace be put in place, or alternatively provisions be incorporated in the Local Planning Strategy or Local Planning Scheme to discourage ad hoc retail development.</p> <p>18. The above is requested to provide a level of protection against opportunistic and ad hoc development of shop / retail floorspace outside of the hierarchy of established Centres. As above, approval of out of centre development</p>	
--	--	---	--

		<p>has significant potential to degrade the level of services and activities in established Centres. This should not simply be discounted on the grounds of commercial completion but in the context of Clause 67(v) of the Deemed Provisions of the Planning and Development (Local Planning Schemes) Regulations 2015. That is, the potential loss of community service of benefit resulting from the development other than the loss that may result in economic competition.</p> <p>19. Concomitant to the above, any proposed new expansions or new activity centres should be required to prepare an RSA under the ACS. We note that an RSA should be required as set out within SPP4.2.</p> <p>20. As the City would be aware shopping centres have been significantly impacted upon due to COVID 19.</p> <p>21. The approval of out of centre development, as described above, further exacerbates COVID 19 impacts.</p> <p>22. Tonkin Highway and Hale Road Intersection Upgrades - As the City is aware Main Roads WA are upgrading the intersection of Tonkin Highway and Hale Road. Whilst not directly related to the ACS, the upgrades have potential to impact on the Forrestfield District Centre.</p>	
--	--	--	--

		<p>23. The first iteration of the interchange design did not contemplate access to or from Hale Road to Tonkin Highway as currently can be facilitated.</p> <p>24. More recently MRWA have revised the intersection design to accommodate access to Hale Road from Tonkin Highway travelling to and from the north. Access to Hale Road to and from the south is currently not facilitated. Restriction of access to and from Tonkin Highway to Hale Road reduces the potential for passing trade and ease of accessibility to the Forrestfield District Centre. Whilst, access travelling to and from the north on Tonkin Highway to Hale Road is supported Hawaiian is further reviewing the impact of the loss of access to and from the south.</p> <p>25. The City's support to retain access from Tonkin Highway to Hale Road is requested given the potential impact on accessibility to the Forrestfield District Centre.</p> <p>26. Conclusion - To conclude:</p> <ul style="list-style-type: none"> a. Hawaiian generally supports the recommendation of the ACS relevant to the Forrestfield District Centre. b. The preparation of an ACP for the Forrestfield District Centre is supported and is considered an important planning tool to assist in securing the ongoing vibrancy and sustainability of the Centre. 	
--	--	--	--

		<p>Hawaiian supports the preparation of an ACP in 2021/2022.</p> <ul style="list-style-type: none"> c. Hawaiian requests that the current retail floorspace of 17,000m2 for the Forrestfield District Centre is increased to 20,000m2 to be consistent with SPP4.2, and such floorspace be allocated for Hawaiian's Forrestfield to provide for co-ordinated and consolidated development. d. The ultimate shop / retail floorspace for the Forrestfield District Centre should be determined by an RSA with the proposed ACP. The envisaged floorspace in the ACS should only be considered a guide given further more detailed analysis will occur through an ACP. e. It is requested that the City consider more stringent controls on out of centre development as outlined in the submission. Approval of out of centre development has the potential to impact upon the established hierarchy of activity centres and result in the loss of the quality of service and diversity of uses within existing Centres. f. The City's support to maintain access to and from Hale Road to Tonkin Highway is requested as retention of the access is 	
--	--	---	--

		<p>critical transport link to the Forrestfield District Centre.</p> <p>27. We trust that this advice will be considered as part of the finalization of the ACS.</p>	
2.	<p>Macroplan on behalf of A134839 (submission 1)</p>	<ol style="list-style-type: none"> 1. This memorandum provides a brief overview of the Draft City of Kalamunda Activity Centres Strategy April 2020, particularly in relation to the proposed Maida Vale NAC. It also provides catchment analysis for the proposed centre. 2. Strategy Review - The Draft Activity Centres Strategy was prepared for the City of Kalamunda in April 2020. The purpose of the strategy is to guide activity centre development throughout the municipality. The population forecasts relied on in the strategy were produced by .id consulting in September 2017, and are therefore relatively dated. It is noted that the strategy does not include the future growth in the Maida Vale South area, though as this area is only zoned as 'urban expansion', not urban, development of this area is likely to occur over the longer term. 3. A retail gravity model is used in the strategy. Outlined in the strategy are the various limitation of gravity models including that it does not allow for consumer preferences; physical amenity of centres; any spending by visitors; accessibility; and the scale of non-retail facilities at each centre. Another major limitation of the gravity model is its calibration, particularly the 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. Population statistics are the most up to date available. 3. Noted. The model and results act as a guide. More site specific modelling required at structure plan and development proposal stages. 4. See response 3. 5. Noted. 6. The Strategy has been amended to remove the post 2026 consideration requirement. 7. See response 6. 8. See response 6. 9. See response 6. 10. See response 6. 11. Outcomes provided as part of this submission have been incorporated into the Strategy. See response 6. 12. See response 11. 13. See response 11. 14. See response 11. 15. See response 11. 16. See response 11. 17. See response 11. 18. See response 11.

		<p>use of Retail Averages (or published data which would be very limited in this case) to determine the likely retail sales of each activity centre. This is a major limitation, as the sales for the majority of centres appear to be estimated based on averages at 2016, some of which are questionable.</p> <p>4. If the calibration of the model is flawed, then any analysis from the model would also likely to be flawed. The model asserts that the establishment of a 5,000 sq.m neighbourhood centre at the Forrestfield North District Activity Centre (DAC) by 2026 'appears to be a reasonable proposition'. This is despite the Forrestfield North Retail Strategy predicting that only up to 1,250 sq.m of retail floorspace would be supportable at 2026.</p> <p>5. The timing of the Forrestfield North DAC will be dependent on a substantial amount of population growth occurring in the Forrestfield North Residential Precinct. In our view, it will be many years (potentially well over a decade) until Forrestfield North can sustain a full-line supermarket.</p> <p>6. In relation to the proposed Maida Vale NAC, it firstly states that 'The site is conducive to retail opportunities because of its exposure to passing trade and proximity on two arterial roads.' However, the strategy recommends that its development is 'considered post 2026',</p>	
--	--	--	--

		<p>despite analysis from MGA Planners finding that a 5,000 sq.m centre 'would be feasible in the short-term'.</p> <p>7. The recommendation to delay the development of the centre is based on expectation that the centre will impact the future designated Forrestfield North DAC and due to State Government and Council's 'significant investment' into the Forrestfield North precinct.</p> <p>8. More concerning is the recommendation in the strategy to delay the development of Maida Vale NAC until 'after the establishment of the retail core at Forrestfield North.'</p> <p>9. This is very concerning as we expect the retail core of the Forrestfield North not being supportable for possibly 10- 15years.</p> <p>10. As detailed following, a full-line supermarket is considered supportable at the subject site in the short-term. We recommend that any submission on the strategy should focus on removing any recommendations in relation to timing and particularly linking its development with the timing of the Forrestfield North DAC.</p> <p>11. Catchment analysis - Map 1 illustrates the extent of the catchment available to be served by a full-scale supermarket at the Maida Vale NAC site. A future supermarket would draw the majority of its sales from the primary sector, with more limited sales being captured from the secondary sectors. It is noted that while the</p>	
--	--	--	--

		<p>Maida Vale NAC will serve the secondary west sector, the sector is not needed to support a NAC at the subject site.</p> <p>12. There is significant land planned for future residential growth in the primary sector, and some of this land is currently being developed for residential housing. A component of the future growth land is located in the southern part of the primary sector (Maida Vale South), though this area is planned to be eventually served by the Maida Vale South NAC.</p> <p>13. Table 1 provides the population estimates and projections for each trade area sector based on a range of sources, with the 2020 estimates based on the number of new dwellings actually developed since 2016 using Nearmap images. The population of the trade area at 2020 is estimated at 26,650, which is substantial and is sufficient to support at least two full-line supermarkets, for example the Coles at High Wycombe and a Woolworths at the subject site.</p> <p>14. Table 2 and Chart 1 detail the socio-demographic profile of the catchment population, based on the 2016 Census of Population and Housing, compared with the Perth metropolitan and national averages.</p> <p>15. Chart 2 presents a comparison of per capita retail spending behaviour of the catchment population with the metropolitan Perth and Australian averages, while Table 3 presents</p>	
--	--	---	--

		<p>estimates of total retail expenditure capacity generated by the population by retail category (which does not allow for the short-term impacts from COVID-19).</p> <p>16. Food, liquor and groceries (FLG) expenditure, which is of most relevance for supermarkets, is estimated at \$189 million at 2020. The primary sector population generates an estimated \$54 million of FLG spending in 2020, increasing to \$60 million by 2023.</p> <p>17. The available market is considered sufficient to support a full-line supermarket at the subject site given the competitive context of the surrounding area.</p> <p>18. Refer to Appendix 1 for tables and images</p>	
3.	Macroplan on behalf of A134839 (submission 2)	<p>1. This letter provides economic analysis to support a submission to the Draft City of Kalamunda Activity Centres Strategy April 2020 in relation to the proposed Maida Vale NAC. Macroplan are leading economic consultants and have worked extensively on existing and future Activity Centres throughout Perth.</p> <p>2. The Draft Activity Centres Strategy (the Strategy) was prepared for the City of Kalamunda in April 2020. The purpose of the Strategy is to guide Activity Centre development throughout the municipality. The Strategy relies on a document titled Activity Centres Strategy: Retail and Commercial Demand Analysis, which was prepared for the City of Kalamunda in March</p>	<p>1. Noted.</p> <p>2. Noted.</p> <p>3. Noted.</p> <p>4. The Strategy has been amended to remove the post 2026 consideration and Forrestfield north establishment requirement.</p> <p>5. See response 4.</p> <p>6. See response 4.</p> <p>7. See response 4.</p> <p>8. See response 4.</p> <p>9. See response 4.</p> <p>10. Noted.</p> <p>11. See response 4.</p> <p>12. Noted. Population statistics are the most up to date available.</p>

		<p>2019 by Syme Marmion & Co together with MGA Town Planners.</p> <p>3. The Strategy identifies the location of the Maida Vale NAC at the intersection of two major roads – Kalamunda Road and Midland Road. Kalamunda Road is a major traffic route through the area, while Midland Road extends north towards Midland. The Strategy states that ‘The site is conducive to retail opportunities because of its exposure to passing trade and proximity on two arterial roads.’</p> <p>4. In numerous parts of the Strategy, it is recommended that the development of the Maida Vale NAC should be considered post 2026. In Section 8.3.4 under Matters for consideration it states that the development of Maida Vale NAC should be considered ‘after the establishment of the retail core at Forrestfield North.’ The key reason for these recommendations is the potential impact Maida Vale NAC may have on the designated Forrestfield North District Activity Centre (DAC), particularly given that the State Government and Council have invested significantly into the Forrestfield North precinct.</p> <p>5. It is requested that all nominal timing restrictions on the potential development of Maida Vale NAC be removed from the Strategy, and particularly any linking of the timing with the future development of retail facilities at</p>	<p>13. Noted. The model and results act as a guide. More site specific modelling required at structure plan and development proposal stages.</p> <p>14. Outcomes provided as part of this submission have been incorporated into the Strategy. See response 4.</p> <p>15. See response 14.</p> <p>16. See response 14.</p> <p>17. See response 14.</p> <p>18. See response 14.</p>
--	--	--	--

		<p>Forrestfield North. Any recommendation on timing should be based on a Retail Sustainability Assessment (RSA), which has not been undertaken for the proposed centre at this stage. Supporting analysis for this request is outlined following in this letter.</p> <p>6. The Strategy states under Activity Centre Strategy Modelling in Section 8.3.4 that 'Analysis by MGA Planners found that the inclusion of 5,000 sq.m of retail at the Maida Vale NAC would be feasible in the short-term, however the impacts on the development of Forrestfield North were considered noteworthy based on the retail gravity model'. The fact that the impacts were 'considered noteworthy' does not appear to be overly concerning, and certainly does not warrant a potential delay in the development of the shopping centre if it is found to have no adverse impacts on the surrounding network of established or future Activity Centres.</p> <p>7. The impact analysis undertaken by MGA Town Planners, which is based on a gravity model, found that the inclusion of a 5,000 sq.m retail centre at the Maida Vale NAC would potentially result in impacts 'that were generally unacceptable', however it clarifies that 'this is based on the assumption that retail proposals identified in the activity centres strategies of all surrounding LGA areas are actually realised.'</p>	
--	--	---	--

		<p>This is a major caveat, and it is clear from this statement that a range of factors can influence the potential impacts from new developments.</p> <p>8. The most appropriate method in assessing the potential impacts arising from an individual centre is to undertake an RSA. Therefore, any reference to the recommended development timing of Maida Vale NAC 'post 2026' should be removed and it should be subject solely to an RSA.</p> <p>9. The Strategy states that the recommended delay of Maida Vale NAC is based on the expectation that the centre may adversely impact the future designated Forrestfield North DAC. The Strategy states that the establishment of a 5,000 sq.m centre at the Forrestfield North DAC by 2026 'appears to be a reasonable proposition'. However, the Forrestfield North Retail Strategy predicts that only up to 1,250 sq.m of retail floorspace would be supportable at 2026.</p> <p>10. The Forrestfield North District Structure Plan, which was completed in August 2016, outlines the broad plan for the precinct. The vision for the Activity Centre is a new main street-based centre including a mix of entertainment and recreational activities with a strong focus on activated food and beverage uses. The vision for the residential component includes some high-density residential neighbourhoods including</p>	
--	--	--	--

		<p>low-rise apartments in the short-medium term and some apartment towers in the longer term, as well as an extensive provision of medium density residential housing. The potential total number of dwellings supportable in the precinct ranges from 4,250 – 5,250, which has the capacity to accommodate 9,350 – 11,550 residents, as well as a further 2,000 workers.</p> <p>11. The planned Forrestfield North DAC is designated to eventually serve a wide catchment and include a broad range of different uses. The core markets the centre will serve in the short term will be residents and workers within the precinct as well as users of the Forrestfield Railway Station. Given the scale of residents and workers to be accommodated within the precinct it is evident that an extensive provision of retail uses will be supportable at the Forrestfield North DAC. However, the timing of the first stage of the Forrestfield North DAC will no doubt be dependent on some residential development occurring in the Forrestfield North precinct. At this stage it is unknown when residential development will commence in the area. Therefore, it is considered unnecessary and inappropriate to link the timing of other Activity Centres in region, such as the Maida Vale NAC, to that of another designated centre with no confirmed or likely timing of development.</p>	
--	--	--	--

		<p>12. Another factor to highlight is that the population forecasts relied on in the Strategy were produced by .id consulting in September 2017 and are therefore relatively dated. It is also noted that the Strategy does not allow for the future growth in the Maida Vale South area, though as this area is zoned as 'urban expansion', not urban, development of this area is likely to occur over the longer term.</p> <p>13. A retail gravity model is used in the Strategy to assess the potential impacts from new Activity Centres. Outlined in the Strategy are the various limitations of gravity models including that it does not allow for consumer preferences; the physical amenity of centres; any spending by visitors; the accessibility of each site; and the scale of non-retail facilities at each centre. Another major limitation of the gravity model is its calibration, particularly the use of Retail Averages (or published data which would be very limited in this case) to determine the likely retail sales of each activity centre. This is a major limitation, as the sales for the majority of centres appear to be estimated based on averages at 2016, some of which appear quite questionable. If the calibration of the model is flawed, then any analysis from the model would also likely to be flawed.</p> <p>14. Macroplan has undertaken high-level catchment analysis for the proposed Maida Vale NAC. Map</p>	
--	--	--	--

		<p>A1 illustrates the extent of the catchment considered available to be served by the future Maida Vale NAC. A future supermarket at the site is expected to draw the majority of its sales from the primary sector, with more limited sales likely captured from the secondary sectors, and less still from the defined tertiary sector. It is noted that while the Maida Vale NAC will serve residents in the tertiary west sector to some degree, the area is not needed to support a NAC at the subject site.</p> <p>15. There is significant land planned for future residential growth in the primary sector, and some of this land is currently being developed for residential housing. The urban expansion land located in Primary South sector (Maida Vale South), will drive growth in the area over the longer term. However, this area is planned to be eventually served by the Maida Vale South NAC, and once this centre is developed the area will most likely not form part of the main trade area defined for the Maida Vale NAC.</p> <p>16. Table A1 provides population estimates and projections for each defined trade area sector based on a range of sources, with the 2020 estimates based on the number of new dwellings developed since 2016 using Nearmap images. The population of the total trade area at 2020 is estimated at 26,650, including 14,260 in the main trade area and 7,500 in the primary</p>	
--	--	---	--

		<p>sector. The estimated population in the core primary sector is substantial and is considered potentially sufficient to support at a Neighbourhood Activity Centre, subject to further analysis as part of an RSA.</p> <p>17. In summary, all references and recommendations for the Maida Vale NAC to be developed post 2026 or after the establishment of the retail core at Forrestfield North, should be removed. This request is based on several key factors including the following:</p> <ul style="list-style-type: none"> a. That the recommendations in the Strategy are based on somewhat dated population forecasts; b. A gravity model was used in the analysis which has some significant limitations when assessing impacts for individual centres; c. The size of the market available the proposed Maida Vale NAC can potentially serve; and d. That the planned centre will serve a very different role and core catchment to that of the future Forrestfield North DAC. <p>18. Refer Appendix 2 for tables and map.</p>	
4.	DMIRS	<p>1. The Department of Mines, Industry Regulation and Safety (DMIRS) has determined that this proposal raises no significant issues with respect to mineral and petroleum resources, geothermal energy, and basic raw materials.</p>	<p>1. Noted.</p>

5.	CoG	1. The City of Gosnells has no objection to the draft Activity Centres Strategy.	1. Noted.
6.	DFES	<ol style="list-style-type: none"> 1. It is unclear from the documentation provided if the Shire of Kalamunda has applied State Planning Policy 3.7 – Planning in Bushfire Prone Areas (SPP 3.7) to this proposal. 2. Exemptions from the requirements of SPP 3.7 should be applied pragmatically by the decision maker and are identified in Planning Bulletin 111/2016. 3. Should you apply SPP 3.7 then, we request the relevant information pursuant to this policy be forwarded to DFES to allow us to review and provide comment prior to the Shires endorsement of the strategy. 4. If there is some other reason which has given you cause to consider a referral to DFES, could you please provide detail on the attached 'Referral to DFES Checklist'. 	<ol style="list-style-type: none"> 1. Not relevant to the Activity Centres Strategy. 2. See response 1. 3. See response 1. 4. See response 1.
7.	DoE	<ol style="list-style-type: none"> 1. I refer to your letter dated 22 May 2020 providing the Department of Education (Department) the opportunity to comment on the draft Activity Centres Strategy (strategy). 2. The Department has reviewed all of the relevant information in support of the draft Strategy. It is noted that an additional 6,988 dwellings are projected to be delivered within the City of Kalamunda by 2036, with a significant 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. Noted. 4. School site consideration not a relevant consideration for the Activity Centres Strategy. 5. See response 4. 6. See response 4.

		<p>proportion of these dwellings accommodated within existing and future activity centres.</p> <p>3. The student yield generated from residential development within these activity centres is expected to contribute to the need for additional public school sites.</p> <p>4. The Department requests that the draft Strategy acknowledges the link between increased residential development within activity centres and the need for additional public school sites.</p> <p>5. The draft Strategy should clearly indicate that new public school sites should be provided in accordance with the requirements of the Western Australian Planning Commission's Development Control Policy 2.4- School Sites and Element 8 of Liveable Neighbourhoods.</p> <p>6. Whilst future school sites are unlikely to be located within activity centres, the Department considers it important to note that additional residential development is likely to trigger the need for public school sites within the City of Kalamunda.</p>	
8.	DoH	<p>1. Activity Centre Strategy Content - It is noted within the Activity Centre Strategy (ACS), that good public health is not specifically recognised as part of the vision or objectives. Good public health outcomes require good planning strategies. The aim of the ACS should include a</p>	<p>1. Not a relevant consideration of the Activity Centres Strategy. The Strategy has actions which aim to improve the public and private realm which in turn provide 'public health' benefits.</p> <p>2. Noted.</p>

		<p>direct reference to 'enhancing the public health of the community' or words to that effect.</p> <p>2. The enclosed DOH fact sheet 'Evidence supporting the creation of environments that encourage healthy active living' may assist you with planning elements related to this structure plan.</p> <p>3. Water Supply and Wastewater Disposal - The ACS should also ensure that development is required to connect to scheme water and reticulated sewerage where possible and be in accordance with the Government Sewerage Policy (2019).</p> <p>4. Public Health Impacts - The ACS should be consistent with climate change adaption methods to deal with potential health hazards such as extreme heat. The guide 'Heatwave Guide for Cities' is intended to be a basic introduction to this topic and a resource for cities to start planning for extreme heat and is available for download from: https://www.climatecentre.org/downloads/files/FRCGeneva/RCCC%20Heatwave%20Guide%202019%20A4%20RR%20ONLINE%20copy.pdf</p>	<p>3. Not a relevant consideration of the Activity Centres Strategy.</p> <p>4. See response 3.</p>
9.	DPIRD	<p>1. Thank you for inviting the Department of Primary Industries and Regional Development (DPIRD) to comment on the City of Kalamunda's draft Activity Centres Strategy.</p> <p>2. I have reviewed the strategy on behalf of DPIRD and have no comments on the draft strategy,</p>	<p>1. Noted.</p>

		apart from noting that DPIRD is part of the Working Group established to support the Pickering Brook Taskforce.	
10.	DWER	1. The Department of Water and Environmental Regulation has assessed the draft Activity Centres Strategy and has no objections. Any potential water or environmental issues will need to be addressed at the relevant planning stages.	1. Noted.
11.	Perth Airport	1. In relation to this one, we've had a look and don't have any issues. Our comments would simply be to update the text on page 28 and 29 which refers to the Draft Master Plan (now Final Master Plan 2020).	1. Modifications made within modified Activity Centres Strategy.
12.	Tourism WA	1. Thank you for providing Tourism Western Australia (Tourism WA) with the opportunity to comment on the City of Kalamunda Draft Activities Centre Strategy. Tourism WA has no comments on this document.	1. Noted.
13.	Main Roads WA	1. In response to your correspondence received on 25 May 2020, Main Roads commends the City on its efforts in forward planning for the community and provides the following recommendations for the strategy: 2. Roads, together with public transport and integrated walking and cycling paths, provide a safe, connected and efficient transport network, as well as access to jobs, schools, commercial centres, community facilities, physical activity	1. Noted. 2. Noted. Transport Study not a consideration of the Activity Centres Strategy. 3. See response 2. 4. Noted. 5. Noted. 6. Noted. 7. Noted. 8. Noted. 9. Noted.

		<p>and open spaces. Transport networks strongly influence a community's action and activity spaces. It is recommended, the City consider undertaking a City Wide Transport Study to support this strategy and inform the future Local Planning Strategy and associated Town Planning Scheme.</p> <p>3. In responding to the transport needs under Section 9.0 Strategic Directions and Actions, it is recommended that the below items be included to strengthen the City's planning direction. (Refer to Appendix 3 – Item 1) Refer to Appendix 3 – Item 2.</p> <p>4. Work is currently, underway within the Transport Portfolio to introduce a "Movement and Place" framework that will inform a future guidance document for Western Australia. The City should consider implementing "Movement and Place" planning principals as part of the precinct planning within the future Local Planning Strategy.</p> <p>5. A robust Transport Impact Assessment (TIA) is to be prepared to support future Activity Centre Plans in accordance with WAPC's Transport Impact Assessment Guidelines (August 2016) and the Department of Transports Modelling Guidelines for Activity Centre Structure Plans.</p> <p>6. Where alternative access is available Main Roads' preference is for allotments to not have direct access onto the Primary Regional Road.</p>	<p>10. Noted.</p> <p>11. Noted.</p> <p>12. Noted.</p> <p>13. Final copy will be sent to Main Roads following adoption by Council.</p>
--	--	---	---

		<p>This position is reflected within Development Control Policy 5.1 Regional Roads (Vehicular Access). There is no suggestion of connections in the document, however this comment has been made for completeness.</p> <p>7. It is important that the State road functions be protected to deliver efficient strategic east west links into Perth. Planning is currently underway to review the Orrong Road/Welshpool Road East this corridor is important connection to the Kewdale Industrial Area and the wider metropolitan area.</p> <p>8. Pre-consultation with the relevant referral agencies should be undertaken in accordance with the Transport Impact Assessment Guidelines (August 2016). This will ensure referral agencies' interests are addressed early in the process. Main Roads encourages such preliminary consultation when an Activity Centre is proposed that impact upon a State Road, to ensure road planning matters are addressed upfront in the consultation process.</p> <p>9. The opportunities and constraints mapping contained within Appendix 5 identifies some future possible road access and transport matters to be resolved. The development areas adjacent to existing State Roads will need to be discussed with Main Roads. The appropriate document to address such matters would be a City Wide Transport Study.</p>	
--	--	---	--

		<p>10. The City is advised that any traffic treatments and modifications to traffic signals will require further approval from Main Roads under Road Traffic Code 2000.</p> <p>11. Noise sensitive land uses located adjacent to the Primary Regional Road reservation must implement acoustic attenuation measures, as outlined in State Planning Policy 5.4 Road and Rail Transport Noise and Freight Considerations in Land Use Planning, to mitigate potential negative externalities generated by the road environment.</p> <p>12. Main Roads requests an opportunity to meet as required and discuss the strategy further, prior to a final determination being made.</p> <p>13. Main Roads requests a copy of the City's final determination on this proposal to be sent to Planning referral email quoting the file reference.</p>	
--	--	--	--

Appendix 1

Table 1 Maida Vale SC trade area population, 2011-2031*						
Trade area sector	Estimated population			Forecast population		
	2011	2016	2020	2021	2026	2031
Primary	7,160	6,980	7,500	7,600	8,200	8,850
Secondary sectors						
• North	2,440	3,080	3,320	3,380	3,680	3,980
• East	3,360	3,440	3,440	3,440	3,440	3,440
• West	<u>11,970</u>	<u>12,310</u>	<u>12,390</u>	<u>12,410</u>	<u>12,510</u>	<u>12,610</u>
Total secondary	17,770	18,830	19,150	19,230	19,630	20,030
Main trade area	24,930	25,810	26,650	26,830	27,830	28,880
Average annual growth (no.)						
Trade area sector	2011-16	2016-20	2020-21	2021-26	2026-31	
Primary		-36	130	100	120	130
Secondary sectors						
• North		128	60	60	60	60
• East		16	0	0	0	0
• West		<u>68</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>
Total secondary		212	80	80	80	80
Main trade area		176	210	180	200	210
Average annual growth (%)						
Trade area sector	2011-16	2016-20	2020-21	2021-26	2026-31	
Primary		-0.5%	1.8%	1.3%	1.5%	1.5%
Secondary sectors						
• North		4.8%	1.9%	1.8%	1.7%	1.6%
• East		0.5%	0.0%	0.0%	0.0%	0.0%
• West		<u>0.6%</u>	<u>0.2%</u>	<u>0.2%</u>	<u>0.2%</u>	<u>0.2%</u>
Total secondary		1.2%	0.4%	0.4%	0.4%	0.4%
Main trade area		0.7%	0.8%	0.7%	0.7%	0.7%

*As at June
Source: ABS Census 2016; Western Australian Planning Commission, WA Tomorrow 2018; Forecast.id; Macroplan

Table 2 Malda Vale SC main trade area - socio-demographic profile, 2016							
Census item	Primary sector	Secondary sectors			Main TA	Perth Metro avg.	Aust. avg.
		North	East	West			
Per capita income	\$45,210	\$50,363	\$53,715	\$39,925	\$44,772	\$44,073	\$39,000
Var. from Perth Metro bmark	7.4%	12.2%	19.7%	-13.3%	-0.2%		
Avg. household income	\$126,656	\$139,079	\$139,925	\$100,637	\$117,874	\$115,642	\$101,610
Var. from Perth Metro bmark	11.1%	20.1%	20.8%	-13.0%	1.8%		
Avg. household size	2.7	2.6	2.6	2.6	2.6	2.6	2.6
Age distribution (% of population)							
Aged 0-14	17.7%	17.9%	17.0%	20.0%	16.7%	19.1%	16.7%
Aged 15-19	6.5%	7.2%	6.4%	5.9%	6.3%	6.2%	6.1%
Aged 20-29	10.0%	14.4%	8.0%	14.7%	12.5%	14.6%	13.8%
Aged 30-39	10.9%	11.0%	8.5%	15.2%	12.7%	15.2%	14.0%
Aged 40-49	13.6%	13.5%	14.4%	13.0%	13.8%	13.9%	13.5%
Aged 50-59	15.5%	15.5%	14.9%	12.5%	14.0%	12.2%	12.7%
Aged 60+	25.7%	20.6%	30.7%	17.6%	22.0%	16.6%	21.1%
Average age	41.2	36.6	43.6	36.6	39.1	37.4	36.6
Housing status (% of households)							
Owner (total)	<u>68.4%</u>	<u>64.6%</u>	<u>68.3%</u>	<u>76.0%</u>	<u>63.3%</u>	<u>71.7%</u>	<u>67.4%</u>
* Owner (outright)	43.6%	35.4%	49.0%	26.1%	35.9%	26.6%	31.9%
* Owner (with mortgage)	45.6%	49.3%	40.3%	49.9%	47.4%	42.9%	35.5%
Renter	10.3%	14.9%	10.1%	21.3%	16.2%	27.4%	31.6%
Birthplace (% of population)							
Australian born	70.9%	76.2%	66.0%	73.4%	72.2%	61.4%	71.9%
Overseas born	<u>29.1%</u>	<u>23.8%</u>	<u>33.2%</u>	<u>26.6%</u>	<u>27.8%</u>	<u>38.6%</u>	<u>28.1%</u>
* Asia	3.9%	3.1%	2.2%	5.0%	4.5%	12.5%	11.2%
* Europe	17.7%	14.4%	24.3%	11.6%	15.4%	16.2%	9.6%
* Other	7.4%	6.3%	6.7%	9.0%	7.9%	9.9%	7.4%
Family type (% of population)							
Couple with dep't child.	45.0%	46.4%	44.6%	43.5%	44.7%	47.0%	44.6%
Couple with non-dep't child.	11.3%	9.3%	9.6%	6.6%	9.5%	7.4%	7.7%
Couple without child.	27.4%	25.0%	31.2%	22.7%	25.4%	22.7%	22.6%
One parent with dep't child.	5.6%	6.5%	4.9%	10.7%	6.1%	6.2%	6.6%
One parent w non-dep't child	2.9%	3.2%	1.7%	4.6%	3.6%	3.3%	3.7%
Lone person	7.1%	6.6%	7.3%	6.9%	6.0%	10.2%	11.0%
Car ownership							
% 0 Cars	2.6%	3.6%	4.6%	0.9%	2.2%	4.9%	7.7%
% 1 Car	26.6%	29.9%	44.6%	22.1%	27.6%	33.1%	36.1%
% 2 Cars	35.2%	40.0%	38.4%	47.4%	42.1%	40.5%	37.5%
% 3 Cars	16.5%	16.0%	8.2%	17.9%	16.0%	13.6%	12.2%
% 4 plus Cars	16.6%	10.6%	4.0%	11.7%	11.6%	7.5%	6.5%

Source: ABS Census of Population & Housing, 2016; Macropian



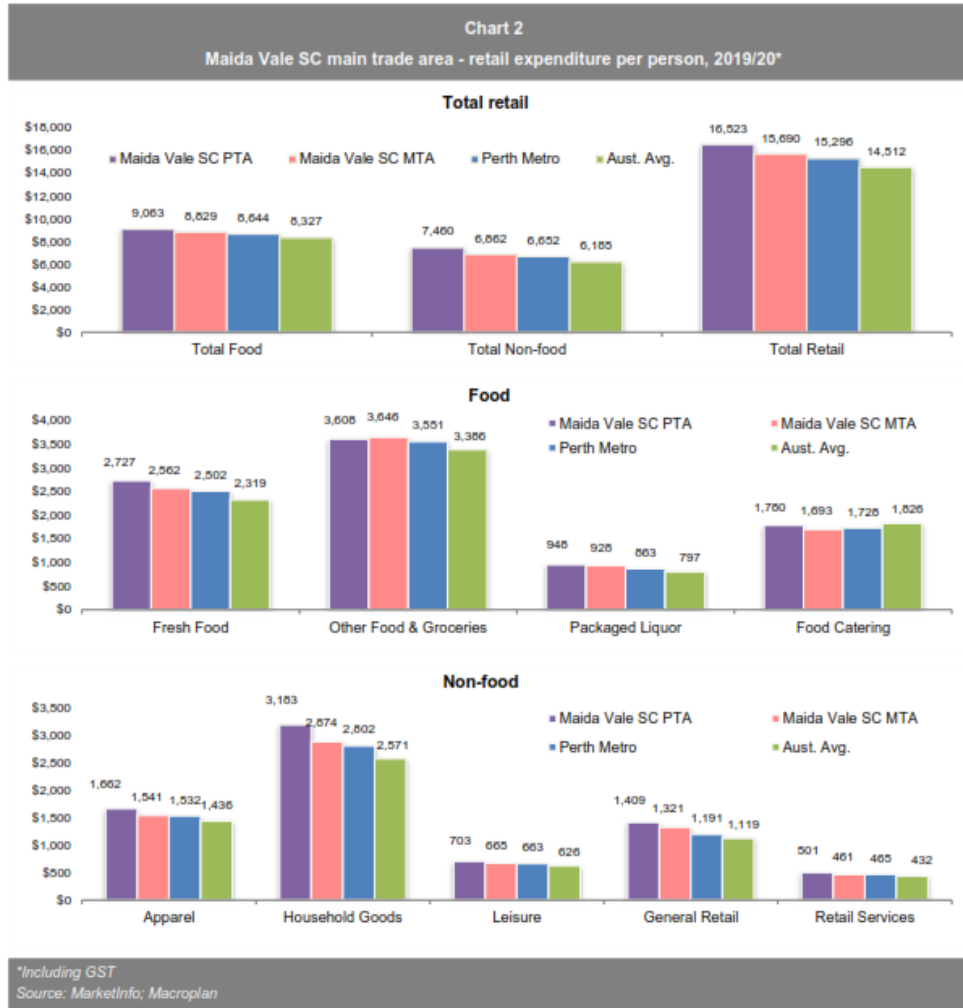
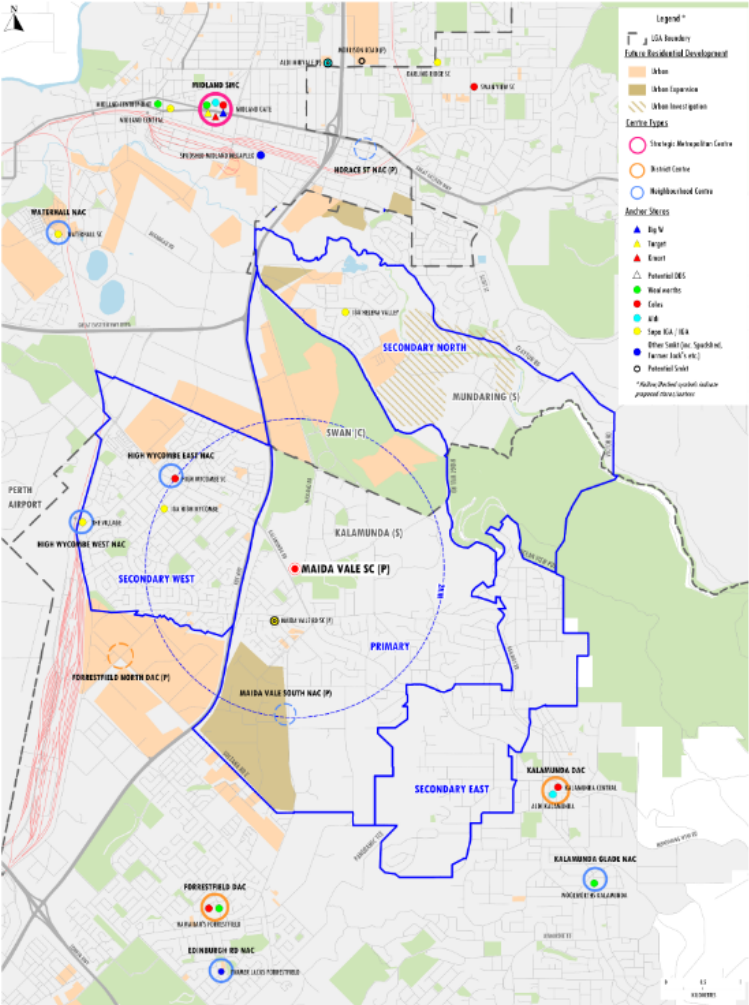


Table 3 Maida Vale SC main trade area - retail expenditure by category (\$M), 2020-2031*								
Year ending June	FLG	Food catering	Apparel	Household goods	Leisure	General retail	Retail services	Total retail
2020	189	45	41	76	18	35	12	417
2021	195	46	42	78	18	36	13	428
2022	201	48	43	80	19	37	13	441
2023	207	50	44	83	19	38	13	454
2024	213	51	45	85	20	39	14	467
2025	220	53	46	87	20	40	14	481
2026	226	55	48	90	21	41	15	495
2027	233	57	49	92	21	42	15	510
2028	241	58	50	95	22	44	15	525
2029	248	60	51	98	22	45	16	541
2030	256	63	53	100	23	46	16	557
2031	263	65	54	103	24	47	17	573
Average annual growth (\$M)								
2020-2031	6.7	1.8	1.2	2.4	0.5	1.1	0.4	14.3
Average annual growth (%)								
2020-2031	3.0%	3.4%	2.6%	2.8%	2.7%	2.8%	3.0%	2.9%
<i>*Inflated dollars & including GST Source: MarketInfo: Macroplan</i>								

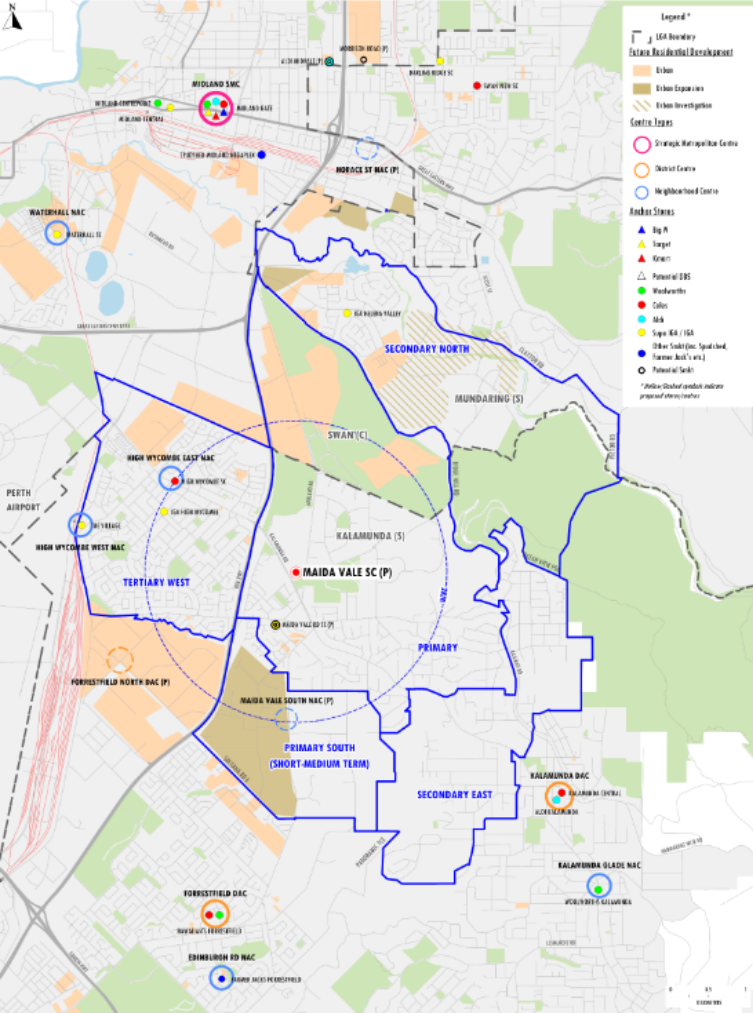
- Retail expenditure category definitions:
- FLG: take-home food and groceries, as well as packaged liquor.
 - Food catering: expenditure at cafes, take-away food outlets and restaurants.
 - Apparel: clothing, footwear, fashion accessories and jewellery.
 - Household goods: giftware, electrical, computers, furniture, homewares and hardware goods.
 - Leisure: sporting goods, music, games, books, newspapers & magazines, stationery and photography equipment.
 - General retail: pharmaceutical goods, cosmetics, toys, florists, mobile phones and pets.
 - Retail services: hair & beauty, optical goods, dry cleaning, key cutting and shoe repairs.



Appendix 2

Table A1 Malda Vale SC trade area population, 2011-2031*						
Trade area sector	Estimated population			Forecast population		
	2011	2016	2020	2021	2026	2031
Primary	7,160	6,980	7,500	7,600	8,200	8,650
Secondary sectors						
• North	2,440	3,000	3,320	3,300	3,600	3,900
• East	<u>3,300</u>	<u>3,440</u>	<u>3,440</u>	<u>3,440</u>	<u>3,440</u>	<u>3,440</u>
Total secondary	5,800	6,520	6,760	6,820	7,120	7,420
Main trade area	12,960	13,500	14,260	14,420	15,320	16,270
Tertiary West sector	<u>11,970</u>	<u>12,310</u>	<u>12,390</u>	<u>12,410</u>	<u>12,510</u>	<u>12,610</u>
Total trade area	24,930	25,810	26,650	26,830	27,830	28,880
Average annual growth (no.)						
Trade area sector	2011-16	2016-20	2020-21	2021-26	2026-31	
Primary		-36	130	100	120	130
Secondary sectors						
• North		128	60	60	60	60
• East		<u>16</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total secondary		144	60	60	60	60
Main trade area		108	190	160	180	190
Tertiary West sector		<u>68</u>	<u>20</u>	<u>20</u>	<u>20</u>	<u>20</u>
Total trade area		176	210	180	200	210
Average annual growth (%)						
Trade area sector	2011-16	2016-20	2020-21	2021-26	2026-31	
Primary		-0.5%	1.8%	1.3%	1.5%	1.5%
Secondary sectors						
• North		4.8%	1.9%	1.8%	1.7%	1.6%
• East		<u>0.5%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>0.0%</u>
Total secondary		2.4%	0.9%	0.9%	0.9%	0.8%
Main trade area		0.8%	1.4%	1.1%	1.2%	1.2%
Tertiary West sector		<u>0.6%</u>	<u>0.2%</u>	<u>0.2%</u>	<u>0.2%</u>	<u>0.2%</u>
Total trade area		0.7%	0.8%	0.7%	0.7%	0.7%

*As at June
Source: ABS Census 2016; Western Australian Planning Commission, WA Tomorrow 2018; Forecast.it; Macropian



Appendix 3

1. Recommended Strategy and Action 1:

Objectives		
Strategies	Actions	Implementation
To respond to the change and growth of population		
NEW ITEM	NEW ITEM	NEW ITEM
1.3 Ensure the Transport network complements and responds to the future needs of the community and Activity Centres.	1.3.1 Undertake a City Wide Transport Study in consultation with DPLH and key stakeholders.	Priority: City to recommend timeframe.

2. Recommended Strategy and Action 2:

Objectives		
Strategies	Actions	Implementation
To ensure equitable spatial distribution of facilities so that communities are not geographically disadvantaged from activity centres.		
NEW ITEM	NEW ITEM	NEW ITEM
3.3 Work collaboratively to deliver infrastructure and services to support planned growth.	3.3.1. Continue to work with developers, WA Government agencies and other stakeholders to ensure residents have access to the appropriate levels of infrastructure and services to meet their needs 3.3.2 Develop Vehicle Access Strategy where appropriate to ensure access is co ordinated	Priority: Ongoing, City to recommend time frame