



Your Ref: Draft State Planning Policy 4.2 – Activity Centres

XX January 2021

Department of Planning Lands and Heritage
Locked Bag 2506
Perth WA 6001

Dear Sir/Madam,

Draft State Planning Policy 4.2 – Activity Centres – City of Kalamunda Submission

Thank you for the opportunity to comment on Draft State Planning Policy 4.2 – Activity Centres (policy). The City of Kalamunda (City) has reviewed the documentation and is broadly supportive of the revised policy which is comprehensive and concise.

The Kalamunda Activity Centre Plan (KACP) was recently adopted at the 24 March 2020 Ordinary Council Meeting and forwarded to the Department of Planning, Lands and Heritage (DPLH) for consideration. The City has also prepared an amendment to Local Planning Scheme No. 3 to give statutory effect to the KACP. The draft SPP4.2 is considered to have no material impact to the KACP and associated Scheme Amendment as forwarded to DPLH.

The City has also prepared a draft Activity Centre Strategy, advertised in June 2020, which will be reviewed by Council for adoption in early 2021. The draft policy is considered to have minimal impact on the final version of the Activity Centre Strategy though may affect the level of information required to support future proposals within Activity Centres.

The City will also be initiating, subject to budget allocation, a Forrestfield Activity Centre Plan in 2021 which will need to incorporate the provisions of the proposed draft policy.

Comments on the proposed draft policy have been included in Appendix 1 for your consideration.

Yours sincerely

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Director Development Services

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Appendix 1 – Submission

The following comments are provided for your consideration:

Section	Comment
Pg 4 7.8, 7.9, 7.10	The inclusion of guidelines for Needs Assessment, Impact Test and Out of Centre Developments is supported.
9 / Appendix 1	Recommend including a definition of the size threshold for each centre classification. In Livable Neighbourhoods this is defined as: a) Strategic regional – 40,000 – 80,000m ² b) District – 15,000 – 25,000m ² c) Neighbourhood – About 4,500m ²
Appendix 1	The residential density target for each activity centre classification is supported.
Implementation Guidelines 5.4	It is recommended to clarify that the intention of the Impact test is to assess the impact on the sustainability of surrounding centres, not just whether the proposal can be supported.
Implementation Guidelines 5.6	The community benefit of the proposal should be weighed up against the community impact/detriment for neighbouring centres when assessing community benefit.
Pg. 2 (7.1) & Pg. 5 (9)	Recommend adding the definition for high frequency public transport to match the definition in the Residential Design Codes Volume 1 – Appendix 1 Definitions.
Pg. 3 (7.4)	Will the diversity ratio apply to individual development applications or to land use permissibility in Local Planning Schemes? Will there be a trigger for providing a diversity ratio assessment in a DA? While and RSA (Retail Sustainability Assessment) would not account for market competition, would a diversity ratio need to account for this when, for example, a local government may receive three petrol stations within 300m of each other on the same road.

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