

**City of Greater Geraldton
Commercial Activity Centres Strategy
Schedule of Submissions**

Submission No. & Date Received	Submitter & Affected Property	Nature of Submission	Comment	Recommendation
1 (03/04/13)	Western Power	Western Power only objects if alignments, easements or clearances are encroached or breached. Changes, if required, to the existing power system is the responsibility of the individual developer.	Comments relate to individual developments and not to the Strategy document.	Note Submission
2 (04/04/13)	John Rigter	<p>This was a comprehensive report but did not mention some important facts.</p> <p>The health of the CBD depends on a sufficient supply of parking, otherwise it will continue in its downward trend. Also this parking should be free. The East Victoria Park Council should be held as an example of how it should be done.</p>	The City has recently adopted a “City Centre Transport Planning & Car Parking Strategy” and a “City Centre Car Parking Management Plan” which adequately covers car parking issues in the CBD.	Note Submission
		Trading hours should be governed by the wishes of the people, and the lifestyle that they desire. Special days could be set aside for special occasions. Like open Marine Terrace on the Sunday of the Sunshine festival. Also have a special policy to retain the local identity of the City, Cities in Canada are trying to achieve that as they look as way as they support the locals, so that the City can its uniqueness.	<p>The Retail Trading Hours Act 1987 applies to retail shops. The Background Report states:</p> <p><i>In considering the merits of the deregulation of retail trading hours in it is suggested that rather than blanket deregulation of trading hours across the board, and in the interests of engendering city vitality over the medium to longer term, the City might consider the establishment of a special shopping / entertainment precinct which may feature deregulated trading hours as part of its profile. This may be used to reinforce the economic activation and creation of multiple value propositions in the City Centre.</i></p> <p>Trading hours are a separate matter that Council considers on a number of occasions.</p>	Note Submission

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2 continued		<p>The timing of the two large district centres planned for the South and North of the City should only be allowed when the City is a certain size. I would think at least twice the size, otherwise they will completely suck out the life of central Geraldton, as other towns and cities in Australia found out when the retail stock in the centre empties because of the surplus supply that has happened because these boundary centres, and the town or city is suffering a down turn in growth, or worse a detracting in size. Mining is not going to grow much longer, the sector is already hitting bumps (Iluka and the Port that has been put on hold), so the continually growth of Geraldton depends on a lot of factors and the predictions could be way out going forward.</p>	<p>The Strategy makes a number of statements in support of retaining the primacy of the CBD such as:</p> <p>7.2 GERALDTON CBD <i>The analysis assumes that existing and future demand for a discount department store is allocated to the CBD or future district centres. There is currently significant regional demand for a discount department store.</i></p> <p><i>If this demand is not to be met within the CBD in short-term there may be a planning argument for bringing forward the development of a DDS anchored district centre sooner than 2021. However given the principles outlined in Chapter 3 of this Strategy the strategic merits of this would need to be carefully considered by the City, based on detailed proposal by a proponent, in order to ensure the ongoing viability of retail in the CBD.</i></p> <p>7.3 DISTRICT CENTRES <i>The modelling of future district centres has been based on the development of a northern district centre by 2016 and a southern district centre by 2021.</i></p> <p><i>This timing of the development of these centres is designed to allow the Geraldton CBD to maximise its floorspace productivity.</i></p>	Note Submission

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2 continued			<p>Additionally the Strategy makes a specific recommendation:</p> <p><u>9.1.7 Geraldton CBD</u></p> <p><i>Actively encourage the consolidation and prioritisation of the Geraldton CBD, which needs to continue to mature into an intense, diverse Regional Centre that provides a range of opportunities for work, leisure and accommodation.</i></p>	
3 (09/05/13)	Department of Agriculture and Food	<p>The Department of Health (DoH) has released Guidelines for Separation of Agricultural and Residential Land Uses; Establishment of Buffer Areas.</p> <p>The guideline provides the DoH position for the establishment of buffers in new residential subdivisions where possible conflict with existing agricultural land uses may occur. When a residential or urban use is proposed next to an existing agricultural area, the buffer areas and separation distance should be located within the area being developed and should not be imposed on the existing agricultural land use. This principle protects the prior rights of agricultural producers to practice agriculture on rural land.</p> <p>DAFWA has also made several suggestions for changes to the strategy text in Section 3.3.4 (Valuable Agricultural Land) of the Background Report in order to improve the clarity of the text.</p>	<p>Changes in the text are supported.</p>	<p>Note Submission</p> <p>Uphold Submission</p> <p>Modify Section 3.3.4 of the Background Report in accordance with the submission.</p>

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4 (09/05/13)	Department of Environment and Conservation	<p>DEC advises the City to comply with:</p> <ul style="list-style-type: none"> All relevant sections of the Environmental Protection Act 1986 and the Contaminated Sites Act 2003 as well as their relevant subsidiary legislation; and The criteria set out in all relevant EPA guidance statements. In particular, EPA Guidance Statement No. 3 'Separation Distances between Industrial and Sensitive Land Uses (June 2005)' which outlines recommended separation distances from different industries to protect other users from emissions and discharges. 		Note Submission
		<p>DEC anticipates that environmental planning issues will be appropriately managed through the City's planning process.</p>		Note Submission
5 (13/05/13)	Main Roads WA	<p>In general supports the strategic planning approach adopted.</p>		Note Submission
		<p><u>Section 8 Decision Making Strategy</u></p> <p>The distinction between minor and major applications is supported, however further clarification could be useful, e.g. major applications could be defined as those that would cover in excess of a particular site area/floorspace.</p>	<p>It is not supported that the size of an application should be the determining factor if a development is considered major or minor. Figure 45 in the Strategy poses 3 questions which are the basis for determining if an application is major or minor:</p> <p>Does the project have a significant impact on the function of the activity centre?</p> <p>Is the project of a significant scale in the context of the centre?</p> <p>Is the project for a site strategically or visually important in the context of the centre?</p>	Dismiss Submission

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5 continued		<p><u>Section 9.1.2 Performance Based Decision Making</u></p> <p>There is no further clarification on what 'performance based decision making' is, which would be useful as it is suggested as a relatively new concept.</p>	<p>Performance based decision making is relatively new but is a somewhat common term used in the industry and as such it is not considered that additional explanation is required in the Strategy.</p> <p>As the name indicates it measures the performance (or merits) of a development against the Strategy rather than its mere compliance with standards such as car parking, landscaping, floor area etc.</p>	Dismiss Submission
		<p><u>Section 9.2.3 Promoting the Use of Public Transport</u></p> <p>Public transport is not discussed anywhere in the supporting text. References should be included in the objectives and principles 3 and 4.</p>	<p>Public transport is noted as a part of the accessibility of activity centres (hence the recommendation in Section 9.2.3). It is the overall accessibility of the centre by various transport modes (not just from public transport) that is the focus and therefore no changes are recommended to the text.</p>	Dismiss Submission
		<p><u>Section 9.2.8 Highway Commercial Areas</u></p> <p>MRWA requests to be involved with any discussions in relation to highway commercial developments or the development of commercial areas as it will have direct impact on MRWA infrastructure.</p>	<p>MRWA is a referral agency in all rezonings and development applications involving MRWA controlled road infrastructure.</p>	Note Submission
		<p><u>Section 9.4 Defining Activity Centre Boundaries</u></p> <p>It is not clear who is responsible for providing roads and access infrastructure and whether this infrastructure would be within the boundaries of the 'Activity Centres'.</p>	<p>The responsibility of infrastructure will be dependent on the individual specifics of the centre and development proposed. It may be a combination of both private and public but cannot be determined within the context of the Strategy.</p>	Note Submission
6 (13/05/13)	State Heritage Office	<p>Part 2.2 of the Background Report details a number of planning instruments considered relevant. Part 2.2.1 'State Statutory Planning', makes reference to several State Planning Policies, and should also refer to State Planning Policy 3.5 Historic Heritage Conservation.</p>	<p>The State Planning Policy gives useful guidance on the identification, planning and management of places of historic heritage significance and it is considered appropriate that it also be referenced.</p>	<p>Uphold Submission</p> <p>Under Section 2.2.1 include reference to State Planning Policy 3.5 Historic Heritage Conservation.</p>

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6 continued		Part 3.2.4 of the Background Report states that 'in the context of the Commercial Activity Centres Strategy, it should also be noted that heritage places in the City may be of economic value to the tourism opportunity'. However there is no reference made within the Strategy to heritage. It is suggested that the Strategy make some reference to this.	There are a number of other statutory mechanisms that provide for heritage (such as town planning schemes, local planning policies and State Planning Policies) and specific reference to it is not considered necessary in the context of a Commercial Strategy.	Dismiss Submission
		Principle 5 makes reference to City places that have a clear and positive sense of identity. Heritage places may also contribute to the City's sense of identity, and to the creation of places that communities can care about. The principle provides good opportunity strengthen the importance of heritage through references to the contribution of heritage places.	The 8 guiding principles in the Strategy are centred around the growth and maintenance of activity centres. The value statement for Principle 5 states: <i>The City values places that have a clear and positive sense of identity ...</i> It is inherent in the statement that heritage contributes to a sense of identity and therefore no changes are recommended to the text.	Dismiss Submission
7 (13/05/13)	Water Corporation	Provided general comments on the effect of increasing density on water and wastewater services.		Note Submission
		Provided advice on the Corporation's review of water scheme planning.		Note Submission
		Provided advice on some constraints to the existing and planned water capacity for northern Geraldton.		Dismiss Submission
		There are potential opportunities for beneficial land uses within the Waste Water Treatment Plant (WWTP) buffers.		Note Submission
		Consider including the buffers on the strategy map.	There are a number of mechanisms for buffer areas to be identified and formally recognised the most effective being the town/local planning scheme. If the Water Corporation seeks to formally protect their asset then they should lodge a scheme amendment to include the buffer areas as was done for the Narngulu WWTP.	Dismiss Submission

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7 continued		Waste Water Pumping Station (WWPS) buffer have not generally been significant but odour buffers should be measured from the site boundary and not a single point.		Note Submission
		General comment on Figure 7 regarding existing water and/or wastewater connection and capacity, and if Water Corp. planning review is required.		Note Submission
8 (14/05/13)	Department of Health	<u>Water and Sewerage:</u> All developments are required to comply with the provisions of the draft Country Sewerage Policy. Potable water must be of the quality specified under the Australian Drinking Water Quality Guidelines 2004.	Comments relate to individual developments and not to the Strategy document.	Note Submission
		<u>Public Health Impacts:</u> The proposed draft Strategy provides the City the opportunity to minimise land use conflicts and incompatible activities which is the most common issue in land use and development. You should consider incorporating Health Impact Assessment (HIA) and/or Public Health Assessment (PHA) principles in your decision making process.	The City is currently preparing a draft Public Health Plan to coincide with the Public Health Bill becoming law once passed by both Houses of Parliament.	Note Submission