

| City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 17 – Schedule of Submissions | | | | |
|---|--------------------|---|--|---------------------|
| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
| 1 (15-06-2021) | Affected Landowner | Support. We as residents in direct proximity to the lot in question are in total favour of the rezoning of Lot 156 Place Road to commercial zoning. | | Note submission. |
| 2 (16-06-2021) | Water Corporation | No objection. | | Note submission. |
| 3 (21-06-2021) | Affected Landowner | Object An alcohol license recently changed hands from one of the owners to an address in Warratah Street in Strathalbyn. | City officers are not aware of what this comment is in relation to. The submitter was contacted to provide additional information however none was forthcoming. Nonetheless, concerns regarding liquor licencing are not considered applicable at the rezoning stage. | Dismiss submission. |
| | | I am concerned by granting approval we could end up with another liquor outlet here, which we don't need. I want to live in a residential area. | The proposed and existing 'Commercial' zoning has the potential to accommodate a number of land uses, including 'Liquor Store'. A development approval has been approved over adjacent Lot 51 which includes a 'Tavern' and 'Liquor Store'. The proposal does not undermine the role of the area for primarily residential uses but supports it by ensuring that infrastructure, services, and amenities are easily available for the local community. | Note submission. |
| | | The original blocks were designed for a reason and should not be tampered with for reasons of profit. The owners of the land bought the property knowing the rules and now want to change them to increase resale value, not wanting to develop it. I strongly oppose any change. | The original subdivision of the landholdings occurred in the late 1980s with the subsequent rezoning of the land occurring in the mid 1990's. The rezoning is requested in order to provide sufficient land area to support a neighbourhood centre in accordance with current standards and requirements. | Dismiss submission. |

| City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 17 – Schedule of Submissions | | | | |
|---|--------------------|--|--|------------------|
| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
| 4 (21-06-2021) | Affected Landowner | <p>Object</p> <p>We don't want noise and cars on our street. Don't want rubbish or shopping trolleys around my property.</p> <p>Don't want potential staff of the businesses parking on the verge or outside my property.</p> | <p>It is important to note that this proposal is for the rezoning of the site only and future development of the land is a separate matter.</p> <p>Any future development proposal will have to demonstrate that it is not detrimental to the amenity of the area. This will include the provision of parking in accordance with scheme requirements and that the site is appropriately managed.</p> | Note submission. |
| 5 (30-06-2021) | ATCO Gas | No comment. | | Note submission. |
| 6 (23-07-2021) | Element WA | <p>Following our detailed review of Amendment 17, we respectfully request that the City does not support the amendment for the reasons outlined below.</p> <p>Economic Overview – Appropriateness of proposed retail floorspace</p> <p>In support of the request for rezoning the applicant has included a summary retail/commercial assessment (Technical Note undertaken by Urbis) as part of their amendment report (Appendix 3 of the Planning Report supporting the proposed rezoning). The Technical Note states that, 'We recommend, that the rezoning of Lot 156 is necessary to allow the centre to fulfill its main role of servicing the daily and weekly shopping needs of residents'.</p> <p>In respect to the Technical Note provided, the City has advised that this, 'demonstrates that the current and expected population growth would support the proposed floorspace. Expansion of the site is expected to facilitate a better spatial layout for the proposed development'. After reviewing the applicant's supporting material and the City's officer report and recommendation, there are a number of concerns with the Technical Note, see below:</p> | | Note submission. |
| | | <u>Expansive Trade Area</u> | The applicant has provided the following | Note submission. |

| City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 17 – Schedule of Submissions | | | | |
|---|-----------|---|---|---------------------|
| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
| | | <p>The catchment defined by the applicant's retail assessment extends 10 km (driving distance) to the north to include residents in Moresby and approximately 7.5 km (driving distance) to the south to include residents in Deepdale. The definition of the trade area appears to give little consideration to the location of competing centres. The trade area does not appear to recognize physical barriers; travel times; the location of urban development and workers; and the location of current and future developments.</p> <p>For instance, a resident from Moresby would have to travel 10 km to perform his daily/weekly shopping at the subject site - this seems to transcend the stated objective of a neighbourhood centre. Moreover, this resident would pass the IGA Glenfield, a full-scale supermarket, which would serve the same purpose at only 4 km driving distance. Retail gravity theory would suggest that this resident from Moresby would gravitate toward Glenfield – not the subject site.</p> | <p>response:</p> <p><i>Whilst the existing residents in Moresby are more proximate to IGA Glenfield, this suburb was identified in the study area as it includes the urban zoned growth areas which will ultimately connect to Strathalbyn Road and Place Road (and be located within 2-4km of the centre). Excluding it would understate the need for this centre over the long-term.</i></p> <p><i>The inclusion of Moresby has a limited impact on the needs analysis given its estimated resident population as of 2019 represents only 13.8% of the trade area's estimated population.</i></p> <p>The City notes the proposed future road connections to Strathalbyn and Place Road. It is also aware that the retail gravity does not consider local factors, including the attractiveness of centres based on the diversity of land uses. In this instance, the proposed provision of a tavern and medical centre provides a mix of land uses not available in other nearby centres.</p> | |
| | | <p><u>No Site Assessment Undertaken</u></p> <p>The report does not include any contextual site analysis that is typically required to understand and define the likely trading area and the benefits of locating the proposed use in this location.</p> | <p>The applicant has provided the following response:</p> <p><i>The site is already identified as an activity centre by the planning framework, and the purpose of the technical note was to understand if there is merit in accommodating the proposed uses.</i></p> <p><i>The rezoning of the subject site would facilitate an expanded site area, but not change the function or hierarchy of the identified site.</i></p> | Dismiss submission. |

**City of Greater Geraldton – Local Planning Scheme No. 1
Amendment No. 17 – Schedule of Submissions**

| Number & Date | Submitter | Nature of Submission | Comment | Recommendation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------|-----------|--|---|------------------|-------|-------|-------|-------|-------|--|--|--|--|---|-------|-------|-------|-------|-------|-------|-------|-------|-------|-----------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|---------------------|
| | | | As per the applicant response, the site has already been identified as a neighbourhood centre in the City's Commercial Activity Centres Strategy (CACS). The proposed amendment and intended development are consistent with the role, function and hierarchy for the Strathalbyn neighbourhood centre and the therefore the information contain in the technical note, including the general trading area and needs identified, are considered appropriate to support the amendment. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | <u>Overstated Population Estimates</u> According to ABS statistics for the latest census year of 2016, the population for the suburbs of Strathalbyn, Moresby, Deepdale, Spalding and Webberton combined amounted to 5,239. The applicant has incorrectly stated and used a population of 6,624 in its assessment, being a 26.5% increase. This has subsequently swayed the data provided in the Technical Note, and it should therefore be dismissed. Suburb 2016 Strathalbyn 1,230 Moresby 870 Deepdale 874 Spalding 2,075 Webberton 190 Total 5,239 <i>Source: ABS 2016 Census</i> | The applicant has provided the following response: <i>The population estimates refer to 2019 rather than 2016. Furthermore, the Census is not an appropriate comparison given it provides an under-count of population levels and ABS adjust these and publish estimated resident population (ERP) estimates.</i> <i>A review of the latest 2019 ERP numbers from ABS is summarised in the attached table. At 6,528 residents, this is broadly consistent with the estimates in the technical note and imply that the estimated current needs are accurate.</i> <table border="1"><tr><td>*Population†</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>■</td><td>2011■</td><td>2012■</td><td>2013■</td><td>2014■</td><td>2015■</td><td>2016■</td><td>2017■</td><td>2018■</td><td>2019■</td></tr><tr><td>Study-Area-ERP■</td><td>6488■</td><td>6612■</td><td>6688■</td><td>6814■</td><td>6797■</td><td>6795■</td><td>6740■</td><td>6623■</td><td>6528■</td></tr></table> | *Population† | | | | | | | | | | ■ | 2011■ | 2012■ | 2013■ | 2014■ | 2015■ | 2016■ | 2017■ | 2018■ | 2019■ | Study-Area-ERP■ | 6488■ | 6612■ | 6688■ | 6814■ | 6797■ | 6795■ | 6740■ | 6623■ | 6528■ | Dismiss submission. |
| *Population† | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ■ | 2011■ | 2012■ | 2013■ | 2014■ | 2015■ | 2016■ | 2017■ | 2018■ | 2019■ | | | | | | | | | | | | | | | | | | | | | | | | | |
| Study-Area-ERP■ | 6488■ | 6612■ | 6688■ | 6814■ | 6797■ | 6795■ | 6740■ | 6623■ | 6528■ | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | <u>Overstated Population Growth Estimate</u> Population growth forecasts used in the Technical Note vary from five-year period to five-year period, but average 4% per annum throughout the projection period. | The applicant has provided the following response: <i>Small Area Forecast Information (SAFi) prepared by .id Consulting, historical lot sale activity and expectations for urban development noted in the Geraldton Regional</i> | Note submission. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 17 – Schedule of Submissions | | | | |
|---|-----------|--|---|---------------------|
| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
| | | <p>By comparison, WA Tomorrow Band C forecasts for North Geraldton average to be 2.3% per annum for the period between 2021-2031, whereas forecasts for Geraldton East average 0.5% per annum for the decade. Overall, the average annual growth rate for the Greater Geraldton (LGA) is estimated to be 0.3% per annum for the period 2021-2026.</p> <p>The compounding effect of the expansive trade area (set out above) multiplied by an overstated population basis and overstated growth rate is significant (250%-300% by our estimates).</p> | <p><i>Land Supply Assessment informed the forecasts.</i></p> <p><i>In comparison, WA Tomorrow is a projection which is significantly influenced by historical growth.</i></p> <p><i>The future land supply of relevance includes:</i> <i>Spalding – 129 dwellings</i> <i>Webborton – 192 dwellings</i> <i>Deepdale – 184 dwellings</i> <i>Woorree – 14 dwellings</i> <i>Moresby – 2,905 dwellings</i></p> <p><i>This estimated future supply of 3,424 dwellings equates to approximately 9,600 persons at 2.8 persons per household. As such, the forecast growth of approximately 8,000 residents over next 20 years is below the urban land supply capacity.</i></p> <p>The City agrees with the applicants comments that WA Tomorrow projected figures are heavily influenced by historical growth however there is some uncertainty around the growth rates proposed in this scenario.</p> <p>Despite these possible deficiencies, the proposed amendment and intended development are consistent with the role, function and hierarchy for the Strathalbyn neighbourhood centre. The additional zoned commercial land will support a mix of land uses which are not available in other nearby centres and will provide a community benefit.</p> | |
| | | <p><u>No Spending Estimates Provided</u></p> <p>No spending estimates have been prepared to establish the floorspace demand in this location. Instead, an average of 350sqm of supermarket floor</p> | <p>The applicant has provided the following response:</p> <p><i>Floorspace per capita supply benchmarking is commonly used for retail needs</i></p> | Dismiss submission. |

| City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 17 – Schedule of Submissions | | | | |
|---|-----------|--|--|----------------|
| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
| | | <p>space per 1,000 population has been used to estimate the supportable floor space. Moreover, this benchmark is based on the average per capita in the Perth Metropolitan area which does not accurately reflect the need in regional areas like Geraldton.</p> <p>Demand modelling enables an understanding of the current and emerging gaps and market under-and over-supply. The applicant's assessment does not assess the need for the proposed retail floor space but rather approximates a general market supportable floor space estimate. The lack of a demand assessment limits the ability to understand whether the proposed development is addressing a community need or in fact, providing an oversupply that will detrimentally affect other centres and in turn, negatively impacting the community.</p> | <p><i>assessments.</i></p> <p><i>Whilst an expenditure approach is more appropriate in some instances, estimates surrounding income growth can overstate future needs if real income growth is not achieved. Further, an expenditure approach requires an accurate understanding of retail turnover density (i.e. turnover per sq.m) benchmarks which are not widely available in regional areas.</i></p> <p><i>The Perth benchmark was utilised given the lack of comparable benchmarks for Geraldton. A review of shop retail per capita levels for other WA regional areas (from the DPLH Land Use and Employment Surveys) however illustrates that retail floorspace provision is generally higher in regional locations. E.g.</i></p> <ul style="list-style-type: none"> ○ <i>Perth – 1.98 sq.m per capita</i> ○ <i>Broome – 2.86 sq.m per capita</i> ○ <i>South West – 2.26 sq/m per capita</i> ○ <i>Lower Great Southern – 2.68 sq.m per capita</i> <p>The City notes that an assessment of retail spend is usually included within a retail need assessment or an impact test.</p> <p>Draft State Planning Policy 4.2 – Activity Centres (SPP 4.2) states a retail needs assessment or impact test is required where the proposal is large in terms of floorspace (exceeding 5,000m²), unplanned or over and above what has been planned. While SPP 4.2 does not necessary apply to areas outside of Perth, Peel and Bunbury, it serves as a guide, and in this instance the amendment would not require a retail need assessment or an impact test to be</p> | |

| City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 17 – Schedule of Submissions | | | | |
|---|-----------|---|--|---------------------|
| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
| | | | <p>undertaken to support the amendment.</p> <p>The City's CACS provides guidance that proposals consistent with its requirements should be considered to be conforming and no additional justification is required.</p> <p>Given the framework provided by SPP 4.2 and CACS it is considered that the technical note is adequate to support the proposed amendment.</p> | |
| | | <p><u>Turnover forecast / impact</u></p> <p>No impact test was undertaken to assess the potential impact of the proposed development on other centres in the hierarchy.</p> <p>Overall, our review has revealed that there are a number of issues within the Technical Note used to support the proposed amendment.</p> | <p>The applicant has provided the following response:</p> <p><i>The assessment demonstrates that there is sufficient unmet need and therefore the rezoning is unlikely to have a detrimental impact on the sustainability of any activity centre.</i></p> <p>Draft SPP 4.2 states an impact test is required where the proposal is large in terms of floor space (exceeding 5,000m²), unplanned or over and above what has been planned. While SPP 4.2 does not necessary apply to areas outside of Perth, Peel and Bunbury, it serves as a guide, and in this instance it would not require an impact test to be undertaken to support the amendment.</p> <p>The City's CACS provides guidance that proposals consistent with its requirements should be considered to be conforming and no additional justification is required.</p> <p>Given the framework provided by SPP 4.2 and CACS it is considered that the technical note is adequate for its intended purpose to indicate the general need and merit for the land uses and no impact test is required.</p> | Dismiss submission. |
| | | Spatial Layout – Supporting Concept Development | The final design of any forthcoming development | Dismiss submission. |

| City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 17 – Schedule of Submissions | | | | |
|---|-----------|--|--|----------------|
| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
| | | <p>The City has advised that there is currently a valid development approval over Lot 51 for a proposed liquor store, tavern, shops and office which is stage 1 of a two stage proposal which also includes a shopping centre. As part of the development approval process, a Local Development Plan was prepared and approved in order to guide commercial development over Lot 51.</p> <p>A concept plan of a proposed development has been provided as part of the applicant's justification for the proposed rezoning.</p> <p>We are of the opinion that the spatial layout of the proposed commercial development with the inclusion of Lot 156, specifically the location of the supermarket on the subject site, is not considered to be any better from a planning perspective (design and function) than the current development approval (without the subject site).</p> <p>The proposed concept plan is shown in Figure 1 below.</p> <p>1. Loading – Loading area is directly fronting Place Road (a District Distributor road) and is not screened from view, resulting in a poor streetscape outcome. It is not clear how loading will occur, with large vehicle movements often being required to reverse into a loading dock, the proposed concept plan does not appear to allow for a safe movement to occur within the site itself. The interface is not considered to be consistent with Clause 4.17.4(c) of the City's LPS1 and would also be unlikely to be consistent with the principles of good design as outlined in State Planning Policy 7.0 – Design of the Built Environment (SPP7.0).</p> | <p>will be subject to an application for development approval where all requirements, including those raised by the submitter, will be fully assessed and addressed.</p> <p>The City has advised the applicant that this will include modification to the Local Development Plan that currently sits over Lot 51. This advice is reflected in the scheme amendment report.</p> <p>It is not warranted for a detailed concept plan to be provided for the purpose of assessing design elements at the rezoning stage.</p> | |

**City of Greater Geraldton – Local Planning Scheme No. 1
Amendment No. 17 – Schedule of Submissions**

| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
|---------------|-----------|--|---------|----------------|
| | | <p>2. Interface – The supermarket appears to be setback approximately 2m from the boundary that adjoins existing low density residential development. The supermarket will likely have a significant wall height (around 8m or so), which is considered to have a detrimental impact on the adjoining properties. This would be unlikely to meet the setback requirements outlined within Table 4 of the City's LPS1, specifically the rear setback.</p> <p>3. Spatial layout – The existing commercial site appears large enough to accommodate a neighbourhood centre (supermarket development). The proposed concept plan shows a supermarket locating across the subject site to emphasise that this land is required to support a future development. We do note that there is already a development approval for a retail development over the existing commercial site that does not include the subject site.</p> <p>4. Local Development Plan – The concept plan does not appear to be consistent with the existing LDP that guides a development on the adjoining commercial site. Notwithstanding it does not include the subject site, the concept plan does not respond to the general development provisions of the LDP, and specifically Items 2 and 6, which relate to setback requirements and building orientation. The concept plan is entirely inconsistent with the LDP, which has previously been approved by Council for the purpose of guiding an appropriate development outcome adjoining low density residential development.</p> <p>5. Parking – There do not appear to be a sufficient number of car parking spaces provided to service the amount of floorspace proposed as part of a future development. This may potentially suggest</p> | | |

| City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 17 – Schedule of Submissions | | | | |
|---|-----------|---|---|---------------------|
| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
| | | <p>that an overdevelopment of the site is proposed. For example, the supermarket land use alone requires 150 car parking bays to be provided. Only 156 car parking bays are provided in total to support a further two land uses/tenancies. In total, a 61 car parking bay shortfall is proposed with no appropriate justification to allow the City to consider the appropriateness of this.</p> <p>6. Other – An insufficient amount of space appears to be allocated for landscaping across the site.</p> <p>When considered holistically, we are of the opinion that the concept plan has several issues that need to be addressed by the City as part of this amendment. Our initial review reveals that the concept plan does not provide adequate justification to support the proposed rezoning, nor the City's commentary, 'Expansion of the site is expected to facilitate a better spatial layout for the proposed development'.</p> <p>It is acknowledged that a lot of the abovementioned matters may be able to be addressed in further detail as part of a future Local Development Plan and development application, however, it is prudent for these matters to be considered now to ensure that the subject site is not inappropriately included within the 'Commercial' zone, only to find that it is in fact not required to support a better spatial layout and overall development outcome.</p> | | |
| | | <p>Local Planning Strategy The City's Local Planning Strategy does not specifically talk to Strathalbyn, but it does identify a neighbourhood centre as locating within this area. The City has outlined that the proposed amendment is consistent with the relevant strategies and actions (listed below) as it, 'proposes to rezone land abutting a commercial centre and will create a lot size that is considered adequate to support a neighbourhood</p> | <p>The increase in the 'Commercial' zone will enable an increase in commercial floorspace however any future development will be required to be consistent with the role, function and retail floorspace required under the CACS.</p> <p>The applicant advises that the difference between the original and proposed development intention is the inclusion of the medical centre</p> | Dismiss submission. |

| City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 17 – Schedule of Submissions | | | | |
|---|-----------|--|--|---------------------|
| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
| | | <p>centre'.</p> <p>Strategies:</p> <ul style="list-style-type: none"> • <i>Establish a hierarchy of activity centres and areas where priority should be given for more intensification in close proximity to existing and planned services.</i> <p>Actions:</p> <ul style="list-style-type: none"> • <i>Implement the land use planning recommendations from the Commercial Activity Centres Strategy.</i> • <i>Zone land in and around activity centres to ensure they provide for residential, retail, commercial intensification and mixed use development as appropriate.</i> <p>As previously mentioned, irrespective of whether or not the subject site is included within the 'Commercial' zone, the adjoining site (Lot 51) is capable of being developed as a 'Neighbourhood Centre' on its own. The proposed amendment (inclusion of the subject site) will simply allow for a larger neighbourhood centre to be developed in this location.</p> <p>It is the size and scale of a larger neighbourhood centre (which Amendment 17 will allow) at this location that is of concern, especially considering the applicant's justification appears to be flawed in relation to the existing and future population supporting the proposed retail floorspace.</p> | <p>which is 500m².</p> <p>This is not considered to be a significant increase. Given that the proposed total floorspace (being 3940m²) sits below the range within the CACS (being 4000m²-6000m²), it is not considered the additional 2036m² of additional commercial zoned land will result in a 'large neighbourhood centre'.</p> <p>The applicant has demonstrated that the proposed amendment and the intended future development meets the guiding principles of the CACS which City's Local Planning Strategy recommends implementing.</p> | |
| | | <p>Commercial Activity Centres Strategy</p> <p>Should the proposed amendment be supported, we understand that the subject site is intended to be amalgamated with the adjoining Lot 51 to create a larger neighbourhood centre in the locality of Strathalbyn.</p> | <p>The City's CACS does not define a major neighbourhood centre. It does apply an activity centres hierarchy and denote an associated status to each centre. There are two neighbourhood centre hierarchy levels, one being the standard 'neighbourhood centre' which are those centres afforded status 2 and 3 and</p> | Dismiss submission. |

| City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 17 – Schedule of Submissions | | | | |
|---|-----------|---|---|---------------------|
| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
| | | <p>Under the City's Commercial Activity Centres Strategy, the Strathalbyn neighbourhood centre is not identified as a major neighbourhood centre, instead, it is recognised in Figure 7 as 'Potential to maintain current role or transition of activity centre into alternative use'.</p> <p>It is clear that the City's Commercial Activity Centres Strategy suggests that the existing commercial site (Lot 51) is capable of being developed to its full potential as a neighbourhood centre, and in the event that it cannot, there is a possibility for the site to be developed for an alternative use (such as residential). As such, the City's Commercial Activity Centres Strategy does not seem to provide any supporting justification for a larger neighbourhood centre (with increased retail floor space) as proposed through Amendment 17.</p> | <p>the other being a 'large neighbourhood centre' which are all afforded a status 1.</p> <p>Strathalbyn is classified as a standard 'neighbourhood centre' with the status 3 denoting 'potential to maintain current role or transition of activity centre into alternative use'.</p> <p>Given that the proposed total floorspace (being 3940m²) sits below the range within the CACS (being 4000m²-6000m²), it is not considered the additional 2036m² of additional commercial zoned land would support a significant development which would imply a status change to a 'large neighbourhood centre'.</p> <p>The proposal is considered consistent with and will not alter the role, function or hierarchy of the Strathalbyn neighbourhood centre under the Strategy therefore no additional justification is required.</p> | |
| | | <p>Commercial Activity Centres Strategy (cont.)</p> <p>The City's Commercial Activity Centres Strategy sets out a number of general policy measures under the suggested strategy implementation section, including managing the impact of retail development. Policy measure 9.2.2 states:</p> <p><i>In determining major shopping developments the City will generally not support proposals which are, in the opinion of the City, likely to:</i></p> <ul style="list-style-type: none"> • <i>Undermine the established and/or planned hierarchy of centres;</i> • <i>Adversely affect the economic viability of existing, approved and planned activity centres where this could result in a deterioration in the level of service to the local community or undermine public</i> | <p>The CACS defines 'major development' as where the proposed development is more than 5,000m². This definition is consistent with the definition of 'major development' within draft SPP 4.2.</p> <p>Given that the proposal is not considered a 'major development' and the intended development conforms with the retail floorspace for neighbourhood centres, assessment in accordance with 9.2.2 is not considered warranted.</p> <p>The amendment has been accompanied by a technical note that broadly demonstrate that the proposed land uses have merit as there is an identified need in the current and future community. This, along with its consistency with</p> | Dismiss submission. |

| City of Greater Geraldton – Local Planning Scheme No. 1 Amendment No. 17 – Schedule of Submissions | | | | |
|---|-----------|--|---|---------------------|
| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
| | | <p><i>investments in infrastructure and services; or</i></p> <ul style="list-style-type: none"> • <i>Adversely affect the amenity of the locality.</i> <p>In our opinion, the proposed development will have an impact on the economic viability of existing activity centres (including Northgate Shopping Centre) and this will result in a deterioration in the level of service that is currently being provided to the local community, essentially through diluting activity at existing centres. In addition, there are a number of concerns with the proposed concept plan that has been provided to support a future development and this amendment as previously outlined above. On this basis, the proposed amendment is not considered to meet the abovementioned policy measures.</p> <p>Policy measure 9.2.6 refers to the required number of car parking bays to service a development. In this instance, the proposed concept plan does not provide a suitable number of bays to support the land uses proposed. As such, it could be determined that an overdevelopment of the site is being proposed.</p> | <p>the CACS, means it is the proposal is considered unlikely to have a detrimental impact on the sustainability of other centres.</p> <p>Issues with the concept plan have been addressed in the previous submission responses, however, any future development will be assessed in accordance with Local Planning Scheme No. 1 which requires the City's to consider the requirements of the Local Planning Strategy (and in turn the CACS).</p> | |
| | | <p>Summary and Recommendation</p> <p>On the basis of our comments provided above, we respectfully request that the City does not support Amendment 17 which relates to Lot 156 (No. 331) Place Road, Strathalbyn.</p> <p>When assessed against the City's relevant planning framework and guidance provided through its strategic documents, the proposed amendment will allow for a future commercial development that is of an inappropriate scale and form that will detrimentally impact the existing amenity of the locality and importantly, the existing and planned hierarchy of centres in the local government area.</p> <p>It is recommended that the City dismiss the supporting Technical Note due to a number of factual and</p> | <p>It is not considered the addition of 2036m² of commercial zoned land would result in a development that is inappropriate in scale for the locality.</p> <p>The amendment and intended development is consistent with and will not alter the role, function or hierarchy of the Strathalbyn neighbourhood centre under the Strategy.</p> <p>While there may be aspects of the technical note that may be deficient, it is important to note that its inclusion was to broadly demonstrate that the proposed land uses have merit as there is a general need within the current and future community.</p> <p>Given that the proposed increase to land and</p> | Dismiss submission. |

**City of Greater Geraldton – Local Planning Scheme No. 1
Amendment No. 17 – Schedule of Submissions**

| Number & Date | Submitter | Nature of Submission | Comment | Recommendation |
|-------------------|---------------|--|---|------------------|
| | | <p>calculation errors, some omissions, and some unfounded assumptions.</p> <p>Prior to the City considering Amendment 17 further, it is highly recommended that the City request the applicant prepare a detailed retail sustainability assessment (RSA) to appropriately justify the demand for the proposed increase in retail floor space and to establish the impact the proposed development will likely have on established centres in the vicinity. Without this information, an orderly and proper decision may not be made on the proposed amendment and this may ultimately lead to a development outcome that is detrimental to the City.</p> | <p>floorspace is not significant, is fully compliant with the City's adopted CACS and not considered major development (proposed development over 5,000m²), there is no requirement for additional justification in the form of an Impact Assessment (Retail Sustainability Assessment). It is considered that the technical note contained within the scheme amendment report is adequate for its intended purpose.</p> | |
| 7 (23-07-2021) | Main Roads WA | No comment. | | Note submission. |