

Flying Minute: Draft State Planning Policy 4.2: Activity Centre Plans (05-036-03-0020 CH)

Chris Hossen, Acting Policy Manager, Planning & Improvement

Cr Ronnie Fleay declared an interest and did not participate.

That the submission to the draft State Planning Policy 4.2 Activity Centres be endorsed.

RESOLUTION 196.FM/2021

CARRIED

Executive Summary

- In October 2020 the Western Australian Planning Commission released the draft *State Planning Policy 4.2: Activity Centres* (SPP4.2) with implementation guidelines,
- The intent of SPP4.2 is to ensure planning and development adequately considers the distribution, function and broad land use considerations for activity centres.

Attachment

Draft State Planning Policy 4.2: Activity Centres - submission

Background

In October 2020 the Western Australian Planning Commission (WAPC) released the draft *State Planning Policy 4.2: Activity Centres* (SPP4.2) with the draft implementation guidelines. The intent of SPP4.2 is to ensure planning and development adequately considers the distribution, function and broad land use considerations for activity centres.

The advertised policy is proposed to replace the current *SPP4.2: Activity Centres for Perth and Peel*, which was gazetted over 10 years ago. SPP4.2 will apply to the Perth, Peel and Greater Bunbury Region Scheme Areas. Local Governments in other parts of the state will be able to apply the principles of the policy to the planning of their activity centres, in collaboration with the WAPC.

In contrast to the current version of SPP4.2 detail regarding the preparation and content of Activity Centre Structure Plans have been removed from the policy. As part of the DesignWA initiative, the Planning Reform agenda Activity Centre Plans have been removed from the planning framework and replaced by precinct structure plans. The recently gazetted *State Planning Policy 7.2: Precinct Design* (SPP7.2) will form the basis for matters that require consideration in precincts that are also activity centres. The Association's submission to SPP7.2 supported the inclusion of activity centre precinct design into the DesignWA framework. This change is a positive simplification of the planning framework.

This change to SPP4.2 provides for a more succinct policy that focuses on the maintenance of the activity centre hierarchy (strategic, secondary, district and specialised activity centres, to ensure that decisions in one centre do not unduly impact on the viability of others. The objectives of policy are to:

1. Provide a hierarchy and network of activity centres that meets community need and provides social, economic and environmental benefits to all Western Australians.
2. Enable the distribution of a broad range of goods, services and activities, including retail, commercial and mixed-use developments that do not undermine the hierarchy of activity centres.
3. Ensure consistency and rigour in the planning and development of activity centres.

Comment

Local Governments have indicated their general support of the draft policy and guidelines. The Department of Planning, Lands and Heritage (DPLH) has consulted broadly with the sector and other stakeholders during policy and guideline preparation. However, as noted in the submission,

the policy and guidelines require further refinement prior to adoption by the WAPC. These changes are largely minor in nature, and thus the Association can support SPP4.2 subject to the consideration of these changes.

The planning of successful multi-functional activity centres is important to Western Australia's economic and social success. In recent years, economic factors and changes in business models have led to a range of concerns in activity centre planning that have caused stresses on Local Governments. Of particular concern are proposals that challenge the established activity centre hierarchy and major development proposals that seek to place themselves outside existing activity centres.

SPP4.2 attempts to address these concerns through the establishment or refinement of two tools: a 'Needs Assessment' and an 'Impact Test'. It is proposed that Local Governments may prepare a Needs Assessment as part of their local strategic planning, or that an applicant may prepare one when proposing a major development. The Impact Test, previously known as a Retail Sustainability Assessment, is required to be prepared when there are concerns that a proposal will unduly impact on the proposed or existing centres. The Impact Test will allow Local Governments to make a more informed decision on such proposals. The inclusion and refinement of these tools are supported.

The draft Policy also takes steps to address the management of supermarkets and also establishes a process for Local Governments to propose changes to the Activity Centre Hierarchy, both matters that have previously been lacking from the state planning framework. The inclusion of supermarkets is of particular importance to the sector. Changing development models and the introduction of new competitors has seen a proliferation of full-line supermarkets into lower level activity centres and also in 'out of centre' locations. This has caused considerable concern about impacts on the viability of existing centres and has also challenged the functionality of local activity centre frameworks. The Association has proposed in its submission even greater certainty when determining supermarket proposals through the establishment of a Model Definition for both 'Neighbourhood Supermarkets (with a maximum size) and supermarkets. This would allow Local Governments to set, through their Local Planning Scheme, the appropriate form of supermarket in each commercial zone.

The Association's submission was prepared in consultation with Local Governments. An early draft of the submission was circulated to members via the Planning Improvement Portal in December 2020. This feedback has been used to inform the final submission. The comment period for submissions closes on 12 February 2021.

Flying Minute Outcomes

Total invited to Survey:	24
Declared an Interest and did not participate:	1
Total Finished Survey:	17
Endorse Recommendation:	15
Endorse Recommendation subject to comment below:	2

Carol Adams OAM	Endorse Recommendation subject to comment below
Phillip Blight	
Julie Brown	Endorse Recommendation
Ruth Butterfield	Endorse Recommendation
Karen Chappel	Endorse Recommendation
Cheryl Cowell	
Malcolm Cullen	Endorse Recommendation
Frank Cvitan	Endorse Recommendation

Tony Dean	Endorse Recommendation
Catherine Ehrhardt	Endorse Recommendation
Russ Fishwick JP	Endorse Recommendation
Ronnie Fleay	<i>Declared an interest and did not participate</i>
Logan Howlett JP	Endorse Recommendation
Mark Irwin	
Paul Kelly	Endorse Recommendation
Jenna Ledgerwood	Endorse Recommendation subject to comment below
Peter Long	
Cate McCullough	
Chris Mitchell JP	Endorse Recommendation
Les Price	Endorse Recommendation
Michelle Rich	Endorse Recommendation
Tracey Roberts JP	
Ken Seymour	Endorse Recommendation
Stephen Strange	
Doug Thompson	Endorse Recommendation

Comments

Jenna Ledgerwood on 24/01/2021 at 10:10

7.5 Employment - This needs to be more specific. My experience in our area is that some developers have wanted to remove all existing employment and replace with a coffee shop, thereby having employment however creating unemployment with the removal of the other stores in existence. Given apartments create more ROI than commercial spaces. 4.7 Supermarkets. Fully support the requirement given previous developers have removed them or wish to. This has an impact on our climate given people are then required to drive further for their provisions and also removes a "sense of community " for no benefit other than ROI for the developer. Developers wishing to retain and improve Supermarkets should be supported.

Carol Adams OAM on 27/01/2021 at 11:42

I have referred the item to our officers for comment. In relation to the guidelines, Part 4.7, the City strongly agrees on recommendation 20 and would ask for the concept to be extended to include size requirements on the Shop land use (add a SHOP - SMALL LAND USE WITH A MAXIMUM SIZE OF 300M2 - as has been done for the liquor store). Typographical error at top of page 5 - Recommendation 11. The CHAPEAU to the list ...

Secretariat Comment

Comments related to part 7.5 Employment are noted. The State Planning Policy provides broad level guidance for decision makers on how to prepare and assess strategic and statutory planning instruments. Matters related to land use diversity and built form outcomes (such as ground floor commercial) are best addressed at the local level by Local Governments through their Local Planning Scheme or Activity Centre Plans.

Comments related to part 4.7 and recommendation 20 are noted and supported. The submission has been amended, and an additional recommendation included that seeks the WAPC consideration of the inclusion of a 'Shop-Small' land use definition as part of any future amendments to the Planning and Development (Local Planning Scheme) Regulations 2015.



SUBMISSION TO THE DEPARTMENT OF PLANNING, LANDS AND HERITAGE

Draft State Planning Policy 4.2 – Activity Centres & Implementation Guidelines

INTRODUCTION

The Western Australian Local Government Association (the Association or WALGA) is the united voice of Local Government in Western Australia. The Association is an independent, membership-based group representing and supporting the work and interests of 139 Local Governments in Western Australia.

The Association provides an essential voice for 1,222 Elected Members and approximately 15,000 Local Government employees as well as over 2 million constituents of Local Governments in Western Australia. The Association also provides professional advice and offers services that provide financial benefits to the Local Governments and the communities they serve.

GENERAL COMMENTS

The Association welcomes the release of the draft State Planning Policy 4.2 Activity Centres (SPP 4.2) and the accompanying Implementation Guidelines for public consultation.

The importance of successful multi-functional activity centres to local economies and the broader Western Australian economy cannot be understated. The role of draft Policy in allowing the careful consideration of how activity centres are distributed and function, is therefore vital in ensuring that activity centres and communities are economically successful.

The revised Policy provides a more streamlined document that complements the recently gazetted State Planning Policy 7.2 - Precinct Planning (SPP 7.2), which supports a higher level of planning for all forms of precincts, including activity centres. The Association's submission to SPP7.2 supported the inclusion of activity centre precinct design into the DesignWA framework. The Association broadly supports the intent and approach that has been taken in the draft SPP 4.2, however there remains several matters that require modification and consideration to ensure that optimal outcomes can be achieved. These matters are addressed in the specific comments and recommendations below.

Recommendation

- 1. The Association supports Draft State Planning Policy 4.2, subject to consideration of the specific recommendations below.**

SPECIFIC COMMENTS

State Planning Policy 4.2 – Activity Centres

Part/Clause	Comment/Recommendation
Part 3 – What are Activity Centres?	<p>The current definition of an ‘activity centre’ includes reference to them being ‘designed to be well-served by public transport’. The current definition provided in Part 3 has removed reference to public transport and instead states:</p> <p>“That are generally well-served by transport networks with a focus on integrated pedestrian access and walkability...”</p> <p>While the focus on pedestrian access and walkability are strongly supported, the removal of public transport from this ‘definition’ is not supported. The wording used in ‘point 7’ Part 6 Policy Outcomes to describe how walking, cycling and public transport should be maximised in and to centres should be used in Part 3.</p> <p>Recommendation:</p> <p>2. That Part 3 be reworded as follows:</p> <p><i>“Activity centres are multi-functional community focal points that vary in size and function. They are generally well-served by transport networks with a focus on maximising integration between walking, cycling and public transport, and may include land uses such as commercial, retail, food and hospitality, higher-density housing, entertainment, tourism, civic/community, higher education, and medical services.”</i></p>
Part 4 – Application of the Policy	<p>This part outlines the geographical extent of the Policy’s application, as well as the types of planning instruments that are required to have regard to the Policy. The draft Policy proposes to apply to the Metropolitan, Peel and Greater Bunbury Region Scheme Areas, with discretion afforded to decision-makers to apply the principles of the draft Policy to proposals in other jurisdictions. The expansion of the draft Policy to cover the Greater Bunbury Regional Scheme area is supported. This part also provides a list of planning processes and plans that decision-makers should also apply to the draft Policy. Missing from this list is ‘Amendments to Region Schemes’: the</p>

	<p>Association believes that any proposed Amendment to a Region Scheme that related to an activity centre should be required to address the draft Policy.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 3. Support the inclusion the Greater Bunbury Region Scheme area within the draft Policy; 4. That the preparation and assessment of ‘Amendments to Region Schemes’ be a planning instrument required to consider the draft Policy; 5. That the phrase ‘local planning proposal’ in the second paragraph of this part be amended to read ‘planning instruments’ to ensure consistency with the first paragraph is this part, and to make clear that regional level instruments, developed by the WAPC, may make use of this part of the draft Policy;
<p>Part 7.2 – Requirement for a precinct structure plan</p>	<p>The draft Policy states that a precinct structure plan is to be prepared for strategic, secondary, district and specialised activity centres, with the decision to create a plan for lower level centres at the discretion of the decision maker. This approach is generally supported. While precinct structure plans form a fundamental part of the planning framework in new and emerging centres, there may be situations in existing centres where the existing planning framework is sufficient to facilitate the orderly and proper planning of that centre. The current wording of the draft Policy does not allow such an outcome. It is recommended that the draft Policy be amended to allow a relevant authority to seek consent of the WAPC to not prepare a precinct structure plan over a centre where the planning framework would facilitate a similar outcome.</p> <p>This part makes clear the expectation that a precinct structure plan should be in place prior to the consideration of a major development in an activity centre. Discretion is provided for consideration of major developments prior to the endorsement of structure plan in certain circumstances. While this approach is supported in principal, the current ‘loose’ wording around what exceptional circumstances are and the lack of clear assessment criteria for decision-makers is concerning. As an example, the terms ‘fully evidence’ and ‘justified’ are not sufficient to:</p> <ol style="list-style-type: none"> 1. guide applicants in the preparation of the proposals; and 2. provide decision-makers with the tools to assess proposals. <p>To compound this issue, the example ‘exceptional circumstances’ are written in a broad fashion. While flexibility is an important factor in the exercising of discretion, the current wording will be likely open to broad reading by</p>

	<p>applicants and likely lead to conflict over interpretations. It is recommended that the exceptional circumstances be refined to provide greater certainty to applicants and decision-makers.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 6. That greater flexibility be established for higher order centres to seek approval from the WAPC to not prepare a precinct structure plan, where it can be justified that the current planning framework is sufficient to facilitate a similar outcome; 7. Clear assessment criteria be provided in Part 7.2 to guide decision makers when considering proposals for major development prior to the endorsement of a precinct structure plan; 8. That the 'exceptional circumstances' be refined to provide greater certainty to applicants and decision makers;
<p>Part 7.4 – Land Use</p>	<p>This part outlines the general approach decision-makers and applicants should take when planning land uses and the intensity of these uses in activity centres. There are four preferred approaches, being:</p> <ol style="list-style-type: none"> a) Allocating desired uses through a local planning scheme, b) Locating high trip-generating uses within or adjacent to centres to maximise use of public transport, c) Encouraging a mix of land uses through precinct plans, and d) Incorporating higher-density housing within and on the peripheries of activity centres to support commercial activity and reduce reliance on cars. <p>The clear direction provided in points b, c and d above are supported. It clearly recognises the need for activity centres to move away from the retail focused paradigm, while ensuring that centres can be supported by community within a walkable catchment.</p> <p>The Association recommends that a minor change be made to this section to aid its readability. The opening paragraph of this section largely repeats the objectives of the draft Policy. This repetition does not aid the reading of the document and should be removed.</p> <p>Recommendation:</p>

	<p>9. Supports the approach and intent of this Part, 10. Delete the following words from the first paragraph of Part 7.4:</p> <p><i>“This policy encourages the development of multifunctional activity centres that can cater for a wide range of office, commercial, retail, food and hospitality, entertainment, education, leisure, cultural/tourist residential and mixed-use land uses.”</i></p>
<p>Part 7.5 - Employment</p>	<p>This part talks to the need for planning proposals to facilitate employment generating outcomes, and places the requirements in this part on ‘planning decision makers’ to facilitate. This approach is in contrast to other parts of the draft Policy that places responsibility on either a process, document or proposal. With the growing tendency for activity centres and proposals in activity centres being proponent led, placing requirements on decision-makers to deliver particular employment outcomes is unlikely to be workable. It is suggested that this part be reworded to state that ‘proposals shall facilitate, where appropriate,’</p> <p>Recommendation:</p> <p>11. The chapeau to the list in Part 7.5 be reworded to state:</p> <p><i>“Proposals shall facilitate, where appropriate,”</i></p>
<p>Part 7.7 – Movement and Access</p>	<p>This part provides guidance and requirements for policy matters related to movement, access and parking. Importantly it provides a clear need for activity centres to maximise opportunities for active transport and a de-prioritisation of private car traffic. This is supported. This part also provides parking requirements for responsible authorities to undertake for higher order centres to adequately manage parking demand. These are broadly supported. However, these requirements are restricted to only strategic metropolitan and specialised activity centres. There may be certain lower order centres, particularly district centres and centres that adjoin high-frequency public transport, which would benefit from clear direction on the use of similar tools. Additional guidance that responsible authorities may utilise these tools should be added to this Part.</p> <p>Recommendation:</p>

	<p>12. The Part be amended to state that lower order activity centres ‘may’ undertake the at the discretion of the responsible authority the requirements currently listed as items ‘d’, ‘e’, ‘f’, and ‘g’;</p> <p>13. Note that the ordering of items in this Part is incorrect and should be amended.</p>
Part 7.10 Out of Centre developments	<p>This part provides guidance for decision makers and applicants on how to address proposals that are deemed to occur outside accepted activity centre boundaries. Proposals, particularly those that could be deemed major development, are often difficult to assess and can cause significant consternation within a community. The requirement that an ‘impact test’ must be undertaken for these proposals, coupled with the low threshold for inclusion in the definition of ‘out of centre’ will provide Local Government with additional level of assessment to assess and determine proposals, which are supported. Two triggers for an ‘impact test’ are outlined. The second states that one is required where in the opinion of the WAPC an impact on the activity centre hierarchy is considered likely. As most proposals are lodged and assessed by Local Government it is unclear how the WAPC would come to form an opinion on such a proposal or be informed about such a proposal. A more logical requirement would be to flip this to state that an impact is considered likely by the relevant authority, in consultation with the WAPC. This would allow the Local Government to make an initial determination and then seek the views of the WAPC before making a final determination on the need for an impact test.</p> <p>Recommendation:</p> <p>14. That the second dot point in this part be reworded to read:</p> <p><i>“The proposed development is considered likely to impact the activity centre hierarchy, in the opinion of the responsible authority and in consultation with the WAPC.</i></p>

STATE PLANNING POLICY 4.2 - IMPLEMENTATION GUIDELINES

Part/Clause	Comment/Recommendation
Part 1	The draft Policy and Guidelines state that they are to be read in conjunction with State Planning Policy 7.1 Neighbourhood Design (Page 1 Clause 4), however, this document does not exist, and will only be released in 2021 for Public Consultation. It is recommended that the reference is retained as just Liveable Neighbourhoods,

	<p>and if Liveable Neighbourhoods is released and adopted as a State Planning Policy, then a minor amendment can be undertaken to these documents.</p> <p>Recommendation:</p> <p>15. Include the correct reference to Liveable Neighbourhoods in place of the yet to be advertised State Planning Policy 7.1 Neighbourhood Design;</p>
Part 4.2 – Changes to the Hierarchy and New Activity Centres	<p>The part provides guidance on how changes to the activity centre hierarchy can occur. The inclusion of this is supported as currently there is limited guidance on how such changes should be managed by Local Governments.</p>
Part 4.3 – Activity Centre Development Proposals	<p>This Part outlines some matters that development proposals are to be assessed against by relevant authorities. The second last sentence talks to how certain proposals may require an impact test. The current wording references only part 7.9 of the draft Policy, however Part 7.10 also sets requirements for when an impact test may be required. This part of the Guidelines should be amended to reflect this.</p> <p>Recommendation:</p> <p>16. Include reference to Part 7.10 to better reflect the requirements of the draft Policy;</p>
Part 4.4 – Diversity of Land Uses	<p>This part outlines the need for activity centres and decision-makers to strive for a diversity of land uses within centres to drive diversity in employment opportunities. This is supported. However, the usefulness of including diversity ratios in the Guidelines, without direct reference within the draft Policy is questioned. It is unclear what weight a decision-maker could apply to the ratios and how they would be useful in guiding applicants and decisions. Consideration should be given to elevating these to the draft Policy.</p> <p>Recommendation:</p> <p>17. Consider elevating the diversity ratios from the Guidelines to the draft Policy to give weight to the provisions;</p>

<p>Part 4.6 Bulk Goods/Large Format Retail Precincts</p>	<p>Part 4.6 includes a statement that <i>“the design of bulky goods/large format precincts must provide for a comfortable walkable environment for all users and not prohibit future redevelopment of the precinct for transitioning other uses over time.”</i> This sentence is unclear how it would be implemented and combines two totally different issues into one sentence.</p> <p>‘A comfortable walkable environment’ could be achieved within a precinct, however it may be difficult to encourage pedestrian movements between premises within these precincts, given the nature of the ‘bulky’ goods being purchased would generally be reliant on vehicle pick up or delivery. Given the limited guidance in this guideline (and in the draft SPP 7.2 Precinct plans and Liveable Neighbourhoods), it may be clearer to state that the design of bulky goods/large format precincts will need to provide for all road users, so that pedestrians and cyclists are factored into the design of the precinct, rather than stating a ‘comfortable walkable environment’.</p> <p>The second part of the sentence <i>“and not prohibit future redevelopment of the precinct for transitioning other uses over time”</i>, should be a separate point and reworded. Consideration should be given to rewording this to state: <i>“The design of the activity centre precinct will also need to consider any possible longer term redevelopment options, particularly for the transitions of land uses.”</i></p> <p>Recommendation:</p> <p>18. That this part be reworded to state:</p> <p style="padding-left: 40px;"><i>“that the design of bulky goods/large format precincts will need to provide for all road users, so that pedestrians and cyclist are imported into the design of the precinct, rather than stating a ‘comfortable walkable environment”</i></p> <p>19. That the second section of this part be reworded to read</p> <p>“The design of the activity centre precinct will also need to consider any possible longer-term redevelopment options, particularly for the transitions of land uses.”</p>
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Part 4.7 Supermarkets	<p>This part refers to the important role supermarkets play in activity centres and communities more broadly. This marks the first inclusion of this into the state planning framework. The inclusion is strongly supported. Recent changes in the supermarket model has challenged standard practices and seen larger supermarkets become more common in smaller centres, at times in a manner that could challenge the viability of the centre hierarchy and existing smaller centres. However, there is an opportunity to provide further guidance and support to the Local Government sector in the setting of appropriate local planning frameworks for supermarkets. The inclusion of a definition for supermarkets within the guidelines, with the intention to eventually add a definition to the Model Provisions, could be of significant use for Local Governments. Consideration should be given to any definition of supermarket being driven by size. For example, in the NSW <i>Standard Instrument—Principal Local Environmental Plan</i> supermarkets smaller than 1,500m² are defined as ‘Neighbourhood Supermarkets’. Such an approach in WA would allow Local Governments to better allocate land-uses to appropriate zones and create more certainty that their centre hierarchy can be maintained. This approach should also be considered for the ‘Shop’ land-use definition through the inclusion of a ‘Shop-Small’ definition within the Model Provisions. This would allow Local Governments to appropriately identify areas that are more suited to smaller retail footprints, and where greater diversity of tenancies are sought through the local strategic framework.</p> <p>This part makes a requirement that supermarkets prepare and implement travel plans and parking supply management plans and must provide a comfortable walking and cycling environment. These requirements are not outlined in the draft Policy, this should be amended.</p> <p>Recommendation:</p> <ol style="list-style-type: none"> 20. That Part 4.7 be expanded to include a definition for supermarkets, including the possibility of a definition for and ‘supermarket’ and ‘neighbourhood supermarket’ with a maximum size similar to that currently used in NSW; 21. That the WAPC consider including definitions for supermarkets within the Model Provisions of the Planning and Development (Local Planning Scheme Regulations) 2015; 22. That the requirement for supermarkets to prepare and implement travel plans, parking supply management plans be included in the appropriate section of the draft Policy; 23. That the WAPC consider the inclusion of a ‘Shop-Small’ land-use definition within the Model Provisions of the Planning and Development (Local Planning Scheme Regulations) 2015;
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Part 5.4 Impact Test Requirements	<p>The current wording of the requirements in this section dictate that an impact test should only consider the potential impact of a proposal on existing and planned activity centres ‘in the locality’. The current wording is general and likely open to interpretation. Specifically, ‘in the locality’ could be construed to mean the suburb, immediate surrounds, or Local Government area and it is likely that some may attempt to argue that activity centres outside these areas should not be assessed, even if there may be impacts from the proposal.</p> <p>Secondly, the wording of the second paragraph states that an impact test must be in relation to all activity centres affected, which contradicts the first paragraph. It is recommended that the words ‘in the locality; be deleted from this part. This will ensure that applicants are required to assess any planed or existing activity centre that may be impacted by a proposal.</p> <p>Secondly, the Guidelines state that the assumptions and findings of an Impact Test should be validated through an independent peer review. The need for an independent assessment is supported. However, the Association does not support the assumption or direction that Local Governments would be responsible for paying for this work. Impact Tests are required when a proposal is stepping away from the local activity centre framework so all costs in supporting such proposals should be borne by the applicant. This would also apply when the Local Government is the applicant. The requirement for an independent review should be mandated within the draft Policy as a requirement for proponents to prepare in collaboration with the relevant authority in Part 7.9 of the Draft Policy.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> 24. Delete the words ‘in the locality’ from the first sentence in Part 5.4 25. The Association does not support the proposition that Local Governments pay for independent assessments of Impact Tests; and 26. That the requirement for an independent assessment of Impact Tests be included in Part 7.9 of the draft Policy and that this clearly state that the cost of these should be borne by the proponent.
Methodological Checklist	<p>The Checklist provided on Page 6 outlines the relevant considerations in the planning of activity centres. One of the considerations in the Regional and District planning requirements, specifically states that it is only for the Perth and Peel region, even though the State Planning Policy includes the Greater Bunbury Region Scheme</p>

	sites in Appendix 2. Is this an oversight, or does the Greater Bunbury Region Scheme area not need to identify targets for employment and dwellings?
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