

# ATTACHMENT C

## ATTACHMENT C

<p><b>TABLE OF SUBMISSIONS AND RESPONSES</b></p>
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No.	From	Issues	Response
1	<p><b>Landowner</b> 501-509 Botany Road, Zetland</p>	<ol style="list-style-type: none"> <li>The submitter supports greater flexibility in the GSTC Local Environmental Plan (LEP) land use controls, such as might be afforded if developers are given an option to develop more retail on individual sites.</li> <li>That retail development should be permitted at ground floor in the GSTC sites along Botany Road to provide a gateway to the centre. The option to develop ground floor retail in these sites would provide greater development viability, and enhance the overall centre.</li> </ol>	<ol style="list-style-type: none"> <li>The Retail Study advocates a reasonable amount of flexibility in terms of land use mix throughout the GSTC, as well as throughout the study area.</li> <li>Retail uses fronting Botany Road within the GSTC may be appropriate. Active frontages along Botany Road should help to activate areas leading to the Civic Plaza and provide for a mix of retail opportunities within GSTC, without diluting the core retail area fronting the Plaza. The suitability of retail in this location will be determined by further analysis currently being undertaken to develop guidelines for the location and design of retail floorspace within the GSTC. This work is due for completion in late 2008 and will be incorporated into <i>City Plan</i>.</li> </ol>
2	<p><b>Landowner</b> South Sydney Corporate Park (SSCP)</p>	<ol style="list-style-type: none"> <li>The definition of ancillary retail development to industrial uses is not clear under the existing planning controls.</li> <li>It is important to provide retail services for the workers on site, such as dry-cleaning or banking services and convenience stores.</li> </ol>	<ol style="list-style-type: none"> <li>'Ancillary retail' means retail services that provide the necessary support to the primary activities within a particular area. The amount of retail floor area should be limited to retail services that can be supported by the area's primary activities SSCP rather than services that rely heavily on trade from beyond the area. The definitions and controls for retail development in industrial areas will be clarified in the new City Plan LEP and DCP to provide more certainty.</li> <li>The proposed <i>City Plan</i> LEP controls allow for the following uses (amongst many others) in the IN1Z Industrial Zone (General Industrial): <i>Child care centres; Industrial retail outlets; Kiosks; Medical centres; Neighbourhood shops; Pubs; Recreation facilities (indoor); Take away food and drink premises</i>. Dry cleaning stores and convenience stores would be permitted with consent in the new <i>City Plan</i>.</li> </ol> <p>The submission suggests that the study recommends an <i>additional</i> 1,000sqm of retail floorspace be located in the SSCP. The Study recommends that a centre of up to 1000sqm be located to serve the daily needs of the southern industrial area. There is a clear preference for such ancillary retailing to be integrated rather than scattered through the Southern Industrial Area. There is not intention to cap the size of centre that may emerge in the SSCP (consisting of the permissible land uses above). The proximity of existing retailing such as the IGA supermarket on Botany Road, Rosebery will also reduce potential demand for ancillary retail services in the SSCP.</p>

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		<ol style="list-style-type: none"> <li>3. Does not necessarily support a 'capping' of ancillary retail, but would suggest that 20% of nett lettable area may be appropriate.</li> <li>4. The definition of 'industrial' development is changing and planning controls need to respond.</li> <li>5. Requests information about the future potential for factories to undertake factory sales.</li> <li>6. Supports the creation of employment opportunities, but argues that planning for large warehouse development contradicts this objective.</li> </ol>	<ol style="list-style-type: none"> <li>3. 20% of nett lettable area for retail uses is considered to be much higher what is required to provide an ancillary service to the SSCP. The current retail allocation within GSTC for example is only 4% of total floor space and this is intended to provide for much more than ancillary retail needs. It is proposed to prohibit <i>Retail premises (other than those ancillary to a permissible use within the zone)</i> in the Industrial 1 Zone in <i>City Plan</i>. Further investigations are being undertaken to define 'ancillary' in the City Plan which will be placed on exhibition in 2009.</li> <li>4. This issue was not within the scope of the Retail Study, but has been investigated in detail in the draft Southern Industrial Area Land Use and Urban Design Study, which was placed on public exhibition in August 2008. Defining ancillary commercial development was not within the scope of the Retail Study, but will be resolved in the City Plan controls.</li> <li>5. In terms of factory outlet sales as an ancillary use, the study noted that most "outlet retailing" within the study area were not ancillary to a manufacturing use but rather a stand alone use. Such stand alone uses were recommended to be contained to the northern portion of the study area in order to provide a more consolidated precinct for shoppers and restrict travel between dispersed outlets. Such uses were considered a viable use of secondary accommodation.</li> <li>6. Warehouse development does support employment opportunities because the other businesses rely on warehousing facilities that can only be supported in a few areas of the City. The opportunities for providing large warehouse spaces close to the airport and to the CBD are limited and have to be protected. Supporting these warehouse uses means supporting industry, commerce and employment across the City of Sydney.</li> </ol>
3	<b>Landowner</b> 'Greensky' site, 9-15 Bowden Street Alexandria	<ol style="list-style-type: none"> <li>1. The submitter will be lodging a DA for this site in the future which will comprise a significant retail component.</li> <li>2. The Study underestimates the amount of supportable retail in the trade area, and that the demand should be approximately 2.48sqm of retail floorspace / person within the trade area. We should be aiming to capture 80%</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted. It should also be noted that the subject site has not been identified in the Retail Study's recommended hierarchy of retail centres.</li> <li>2. Jones Lang LaSalle estimates that total retail provision in metropolitan Sydney is approximately 2.2sqm per person. This is figure is not applicable to the Study Area for the following reasons:                         <ul style="list-style-type: none"> <li>▪ Higher order centres outside the study area reduce the need for a higher</li> </ul> </li> </ol>

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		<p>household retail expenditure – and therefore reducing travel times.</p>	<p>order retail centre at GSTC, and reduce the total retail floor space required within the study area to service the population. In other words, there is likely to be more retail spending leaked from the catchment area than coming in from beyond the catchment area. The submission’s assessment does not take into account the impact that major retail supply in nearby centres such as the CBD, The Broadway, Bondi Junction and Eastgardens have on supportable demand within the trade area. The study area is regarded as being part of the trade area for Bondi Junction, the CBD and other major centres. These centres will continue to draw trade from Green Square, particularly for higher order goods not provided at Green Square. It should also be noted that many of these higher order centres are well served by public transport. The GSTC and other centres in the study area would not be able to compete with these other centres to the point where 80% of spending is captured within the study area.</p> <ul style="list-style-type: none"> <li>▪ The Retail Study’s “Market Analysis” concentrates on retailing in main centres anchored by at least a small supermarket, as well as analysis of the bulky goods sector. This is a subset of total retail space, and in the case of the study area, there is considerable secondary retail space, some main street retailing and outlet retailing, which all contributes to the overall retail provision within the study area.</li> <li>▪ Recent fieldwork undertaken for the City of Sydney’s <i>Floorspace Employment Survey</i> revealed that approximately 140,000sqm of retail floor space existing in the Retail Study Area. Approximately half this space was showroom / bulky goods floor space with the remaining space being a mix of retail shops, small grocery stores, cafes and restaurants located outside of centres anchored by a supermarket (i.e. not included in the analysis and therefore distorting the calculations of the total retail demand in the Study Area). The provision rate quoted of 2.2sqm per person takes into account all retail space, including space outside of centres and space that is considered unviable.</li> <li>▪ Across the Sydney metropolitan area, retail centres anchored by a supermarket and other major anchors (typically referred to as neighbourhood, sub-regional and regional centres) account for less than 35% of total retail floor space. The Study’s finding that 51,000sqm of retail floorspace is supportable in centres is therefore only a similar subset of total retail in the study area.</li> </ul>

No.	From	Issues	Response
		<p>3. Proposed supermarket centres should be better distributed to serve a wider area, and not just in the east of the Study Area.</p> <p>4. It is recommended that the retail floorspace permitted in the GSTC be increased to up to 50,000sqm (whereas the report recommends an increase from 16,500sqm to 26,500sqm)</p> <p>5. The proposed hierarchy of centres is too prescriptive and mixed use developments and convenience strips should be permitted.</p>	<p>The draft Study's calculations also use a definition of retail space that does not include showrooms, services (such as travel agencies, accountants, optometrists) or ancillary commercial space, which also accounts for the discrepancy. 10.</p> <p>As such, it is considered the draft Study's recommended hierarchy of retail centres does not underestimate the amount of retail floorspace supportable.</p> <p>3. Two of the nominated supermarket based centres in the hierarchy are east of Botany Road. These centres were recognised in the hierarchy because they are both approved, with construction having commenced on the Crown Square site. These sites are supported because the distribution of existing and forecast residential populations are primarily east of Botany Road, while the west of the GSTC will continue to have a predominantly employment function.</p> <p>4. Increasing the retail floorspace in the GSTC to the submitted amount would drastically change the role of the GSTC as a retail destination. The vision for the GSTC is for a 'Planned Major Centre' as presented in the NSW Government's Metropolitan Strategy, but also in the City's planning documents as a vibrant mixed use centre, which is a destination for its community facilities and public domain and not just retail facilities. The Study recommended that the increase to 26,000sqm will allow for two major anchors in the GSTC and enough speciality retail to achieve a viable shopping precinct.</p> <p>5. The main aim of the retail hierarchy is to provide recommendations on the distribution of supermarket based centres, having regard to the NSW State Government's <i>Metropolitan Strategy's Centres Policy</i>. The Centres Policy aims to concentrate a greater range of activities close to one another, making it easier for people to go about their daily activities and reduce travel time. Convenience strips and ground floor retail to activate frontages and serve daily needs of the local population are supported. It is expected that new developments will seek to provide retailing for day to day shopping needs outside of the designated zones. Therefore flexibility is assumed to allow this. This would also provide the flexibility to activate key streets.</p> <p>The recommendations of the Retail Study will be translated into planning controls for the Study Area in the City Plan LEP and DCP. Proposed controls will identify</p>

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		<p>6. The Study does not provide sufficient information on how the trade areas were determined.</p>	<p>where the centres in the retail hierarchy should be located. The City Plan will also identify mixed use zones throughout the whole study area which will allow for convenience retail development and active frontages as supported by demand. The resulting planning controls will not place a cap on the total amount of retail development to be located in the study area – only identify where the supermarket based centres (or villages) are to be developed and how these centres complement the strategic vision for the study area.</p> <p>6. Trade areas were determined taking into account the location and extent of competition, barriers such as main roads, rail and the intended positioning of the GSTC as a proposed Major Centre. The proximity of well established centres with very comprehensive retail offers, such as the CBD, Bondi Junction and Eastgardens restricted the size of the trade area.</p>
4	<b>Botany Council</b>	<ol style="list-style-type: none"> <li>1. GSTC will have an impact on the proposed development of Eastlakes as a Town Centre, as it is identified in the NSW DoP's Draft East Sub-regional Strategy. It is planned to redevelop this centre to provide a bus interchange, additional retail and commercial floorspace and improved traffic arrangements.</li> <li>2. The City of Botany has not objection to permitting bulky goods development in the LGA.</li> <li>3. The City of Botany's Draft Strategic Planning Study (being prepared by SGS Economics) will be placed on exhibition in late September 2008. The main outcomes are: <ul style="list-style-type: none"> <li>▪ An enterprise corridor is recommended for Gardeners Road;</li> <li>▪ Mascot Station is identified as a Town Centre that should accommodate 1,750 new jobs and 3,000 new residents;</li> <li>▪ 'Activity hubs' are proposed on the corner of Botany Road and Rolfe Street (Rosebery) and the corner of Botany Road and King Street (Mascot).</li> </ul> </li> </ol>	<ol style="list-style-type: none"> <li>1. GSTC is identified as a 'Planned Major Centre' under the NSW State Government's <i>Metropolitan Strategy</i>. As such, the GSTC will have a larger catchment area than the Eastlakes Town Centre, and it is considered appropriate for the GSTC to support a broader range of retail. As a Town Centre, Eastlakes is expected to provide for a more local catchment than Green Square.</li> <li>2. Noted.</li> <li>3. Noted.</li> </ol>

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5	<p><b>Landcom</b> Landowners and property managers, GSTC</p>	<ul style="list-style-type: none"> <li>▪ The constraints for the development of Eastlakes as a Town Centre are to be further investigated.</li> <li>▪ While the current Botany LEP does not permit bulky goods retailing, the proposal is to identify areas in the LGA where this retailing would be appropriate.</li> </ul> <ol style="list-style-type: none"> <li>1. Landcom strongly supports: <ul style="list-style-type: none"> <li>▪ The GSTC as a 'Planned Major Centre' in the defined hierarchy of centres.</li> <li>▪ The increase of retail floorspace in the GSTC by 10,000sqm to a total 26,000sqm.</li> <li>▪ Retail development in other competing centres should be limited to ensure the vitality of the GSTC.</li> </ul> </li> <li>2. Because the Study's recommendations have no statutory weight prior to their incorporation into, and the exhibition of the City Plan, the City should consider either amending the existing LEP, or writing a new DCP to provide statutory support for the recommended retail hierarchy now.</li> <li>3. Landcom have engaged consultants to undertake an urban design study to locate the recommended additional retail floorspace in the GSTC. The studies found this retail difficult to accommodate and it is likely that changes to the design of the centre are required.</li> <li>4. While it is important to try and achieve ESD and public transport objectives, appropriate car parking rates for retail development in the GSTC will be vital to its success. With nearby shopping centre achieving high car parking rates,</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. Council on 12 May 2008, and the Central Sydney Planning Committee (CSPC) on 8 May 2008 resolved to support the recommended hierarchy of retail centres and that retail development outside of these centres should be limited to minor retail development. This resolution gives this particular recommendation of the Study statutory weight. It is recommended that Council and CSPC resolve to use the recommended hierarchy of centres to inform the assessment of planning applications. The Retail Study was also noted as informing the preparation of the City Plan LEP and DCP by Council on 12 May 2008, and the CSPC on 8 May 2008, and the City Plan is due for exhibition in 2009. It is not proposed to amend the existing LEP and DCP at this stage to reflect the findings of the Study.</li> <li>3. Noted. The City is investigating this issue in Stage 2 of the Retail Study, which specifically aims to locate the additional retail space across the development sites in the GSTC, and then prepare guidelines for the design of retail development. This Study will be completed in October 2008, and incorporated into the City Plan LEP and DCP for exhibition in 2009.</li> <li>4. The car parking rates for retail development in the GSTC will be determined as part of the City's current review of car parking rates for the City Plan LEP and DCP. This review will take into consideration the recommendations of this Retail Study in terms of making the centre economically viable from a commercial</li> </ol>

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		<p>the GSTC must be able to compete with these centres.</p>	<p>perspective, environmental objectives and the outcomes of the Green Square TMAP.</p>
6	<p><b>NSW Department of Housing</b></p>	<ol style="list-style-type: none"> <li>1. NSW Department of Housing supports any strategy that helps the GSTC achieve its role of 'major centre', including the recommended hierarchy.</li> <li>2. There are three major public housing developments in close proximity to Green Square, which contain 5,431 dwellings. The 3 sites are: Redfern Waterloo; Elliot Avenue, Erskineville and 'Northcott', Surry Hills.</li> <li>3. NSW DoH are currently examining options for the renewal of the housing stock in the RWA area and planning for retail in Green Square should support these 'community renewal initiatives'. It is a concern that the study assumes a future population in the area that is young and affluent, and focuses on providing for this population only.</li> <li>4. Shopping centres should provide a location for social integration and interaction, however this objective could be hard to achieve if centres are aimed at a certain demographic only.</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. Noted.</li> <li>3. The Retail Study does not recommend specific retailers over other retailers or suggest only catering for one sector of the population - rather it provides an indication of the retailers that will most likely be attracted to the centre as a result of the changing demographic. The study assumes that, on balance, the average resident in the primary catchment will be more affluent than existing residents. These assumptions are based on the profile of new residents in Crown Square and Victoria Park. Nevertheless, affordable household staple goods will be available in the future in the Study Area through a variety of stores, including supermarkets and discount department stores.  The recommended supermarket based Village Centres are located where shopping centres have been approved or are under construction, so there has been little flexibility in locating these centres. The centres are located within the walking catchments of a large number of residents.</li> <li>4. The proposed Village Centres are proposed to be identified in the City Plan DCP as the location for future public domain upgrades and a focus for the provision of public transport services and community facilities. These measures are expected to promote the future centres as meeting places for all residents. In addition, the strong focus on the public domain in the GSTC and the intent to provide a wide range of community facilities in the GSTC will also make this new centre accessible and attractive for all residents.</li> </ol>

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		<p>5. In order to provide affordable local retail facilities, it is proposed to provide one or more supermarkets in the RWA area.</p>	<p>5. Noted.</p>
7	<p><b>NSW Police Force</b> (as landowners, 377-497 Botany Road, Zetland)</p>	<p>1. This submission supported the recommendations to increase the amount of retail floorspace in the GSTC and to limit retail to the nominated hierarchy of retail centres.</p> <p>2. Argues that retail development in close proximity to the GSTC should be limited to “ensure that the GSTC remains the premier retail centre in Green Square, and the viability and sustainability of the centre is not compromised”. The submission argues that Gazcorp and Victoria Park already threaten the viability of the GSTC.</p> <p>3. Endorses the recommendation to increase retail floorspace in the GSTC to 26,000sqm. Westfarmers (owners of Kmart and Target) are both looking for a location in Green Square and the GSTC would be a good location if the land use controls permitted this outcome.</p> <p>4. The car parking rate for the GSTC will be critical to its success. The rates should be greater than that permitted in the Gazcorp development. (Does not support 3.5/100sqm, and should exceed 5/100sqm.)</p> <p>5. The GSTC must have a full-line supermarket. A supermarket of less than 2000sqm in size can not meet demand in the GSTC.</p>	<p>1. Noted.</p> <p>2. Noted. As discussed in the response to Submission No. 6, prior to the exhibition of City Plan, the Retail Study will be of some assistance in protecting the future viability of the GSTC, in that it is intended that the Retail Study (having been on exhibition and noted by Council) informs the assessment of development applications.</p> <p>3. Noted.</p> <p>4. The car parking rates for retail development in the GSTC will be determined as part of the City’s current review of car parking rates for the City Plan LEP and DCP. This review will take into consideration the recommendations of this Retail Study in terms of making the centre economically viable from a commercial perspective, environmental objectives and the outcomes of the Green Square TMAP.</p> <p>5. It is not intended to limit the size of the supermarket in the GSTC. Supermarket operators will determine the size of a supermarket that is desirable.</p>
8	<p><b>Landowner</b> ‘Sydneygate’ site, 1-5 Sydneygate,</p>	<p>1. The Retail Study should recognise the 6,203sqm of retail space approved in the Sydneygate site masterplan approval, or the 19,540sqm potentially possible under the mixed use condition of the masterplan approval (25% non-</p>	<p>1. The Retail Study’s recommendations do not affect this approval. Any future application for retail development on this site will be assessed having regard to the Retail Study and Council’s resolutions on the matter.</p>

No.	From	Issues	Response
	Waterloo	<p>residential uses are required). It is the landowner's intention to include more retail floorspace within this site, and potentially a supermarket.</p> <p>2. Refers to the <i>Choice Free Zone</i> report, which argues for a more flexible planning framework to cater for future retail demand.</p>	<p>The site however, is not recognised as a centre in the recommended hierarchy of centres and therefore is not likely to be an appropriate location for a supermarket based centre. The site is in close proximity to Victoria Park, Crowne Square and the GSTC, and a supermarket on the site would draw from the catchment areas of all three of these centres. Cafes and convenience stores may be more appropriate on the site where they supply a more local retail demand. Any application for retail development on the Sydneygate site would need to be accompanied by an Economic Impact Assessment that explains the proposed development's impact on the surrounding centres nominated in the retail hierarchy.</p> <p>2. The <i>Choice Free Zone</i> report was released by the Urban Taskforce Australia in May 2008, a NSW based industry organisation representing property developers, equity financiers and others with an interest in property development. The report was prepared as a submission for the ACCC's inquiry into supermarkets and competitiveness, which was called for in February 2008. The premise of the report is that NSW planning controls restrict retail competition and effectively result in higher retail prices, particularly in groceries and basic household goods. The report argues that centres planning policies prevent competitiveness in supermarket retailing.</p> <p>In summary, <i>Choice Free Zone</i> does not reflect the NSW Department of Planning's or the City of Sydney's planning policies and should not steer the direction of such documents as the draft <i>Retail Study</i>.</p> <p>Centres policy is a fundamental principle of orderly planning. The City's vision for Green Square and the surrounding area includes strategies for public domain and public transport infrastructure improvements, cycle and walking connections, open spaces and green connections which heavily rely on the enhancement of mixed use centres. The City must encourage the development of centres to achieve the desired urban structure. Sustainable Sydney 2030 also recognises the importance of the formation of centres.</p>
9	<b>Ministry of Transport</b>	<p>1. Submission advises that the TMAP is currently being prepared by the Ministry (in conjunction with other agencies including the City of Sydney).</p>	<p>1. Noted.</p>

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10	<p><b>Landowner</b> 20 O'Riordan Street, Alexandria</p>	<p>2. The Green Square TMAP will consider a range of initiatives to reduce vehicle dependence, and minimising car parking in the GSTC will be critical to achieve these objectives – as such the draft recommendation to increase car parking rates in the GSTC (for retail development) to 3-4 spaces/100sqm is not supported by the Ministry.</p> <p>1. The retail hierarchy is based on the defined GSTC boundary and should consider a more organic boundary for the GSTC, which would radiate from the GSTC naturally. The subject site is within 130m of the GSTC, and 200m of the train station.</p> <p>2. Overall, the proposed approach is too prescriptive. Retail planning in general needs to be more flexible to respond to change.</p> <p>3. The Study underestimates the amount of retail floorspace supportable in the study area</p> <p>4. The submission references some findings of the paper <i>Choice Free Zone</i>, which was released by the Urban Taskforce Australia in May 2008.</p>	<p>2. The car parking rates for retail development in the GSTC will be determined as part of the City's current review of car parking rates for the City Plan LEP and DCP. This review will take into consideration the recommendations of this Retail Study in terms of making the centre economically viable from a commercial perspective, environmental objectives and the outcomes of the Green Square TMAP.</p> <p>1. In regard to the boundaries for the GSTC, it is important that the viability of the 'Planned Major Centre' is not compromised by excessive competing retail development in the immediate context of the GSTC. The success of the centre as a community hub will rely to a great extent on the success of it's retail component, and this should not be watered-down by retail development that has an unacceptable impact on the centre.</p> <p>2. It is considered that the Retail Study's recommendations and the proposed planning controls will provide flexibility for retail development to respond to market forces. While the Study focuses on planning for centres, Study's recommendations do not preclude the development of active frontages and small neighbourhood centres (where supportable) in appropriate location outside of these centres.</p> <p>While the Study recommends quite descriptive controls for these centres, it is not envisaged that neighbourhood centres and mixed use strips as supported in demand. At this time, this centres methodology is necessary for planning for the City's public infrastructure. Any changes to the retail market over time will be addressed through future revisions of the City's LEP and DCP.</p> <p>3. Refer to Submission No. 3. Point 2.</p> <p>4. Refer to Submission No. 8, Point 2.</p>

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11	<p><b>Landowner</b> Sites in Victoria Park</p>	<ol style="list-style-type: none"> <li>The Study underestimates the amount of retail floorspace supportable in the study area.</li> <li>The methodology for determining demand needs to be revised as it is too outdated and 'narrow'.</li> <li>The proposed hierarchy of centres does not acknowledge the 8,500sqm of retail currently approved in the Victoria Park site and proposes a village centre in this location which has a recommended size of 6,000sqm.</li> </ol>	<ol style="list-style-type: none"> <li>Refer to Submission No. 3, Point 2.</li> <li>Demand is calculated by establishing a trade area for a centre (in this case the GSTC) and establishing the future population of this area. The trade area was determined taking into account the location and extent of competition, barriers such as main roads, rail and the intended positioning of the GSTC as a 'Planned Major Centre', albeit with a considerably smaller retail focus than the likes of Bondi Junction. The proximity of well established centres with very comprehensive retail offers, such as the CBD, Bondi Junction and Eastgardens, restricted the size of the trade area, and therefore demand.</li> <li>The objective of the Retail Study was to provide a guide as to the level of retail floor area appropriate in each centre within the hierarchy, having regard to the Metropolitan Strategy's Centre Types. Village Centres (of which Victoria Park is one of in the proposed hierarchy) are primarily aimed at serving the daily needs of the population within walking distance of the village. 6,000sqm of retail floor space provides for more than the level of retail anticipated within a village, including a relatively large supermarket. Larger centres will need to draw on larger catchment areas, provide a greater range of retailing beyond the daily needs of the catchment, and therefore potentially compete with higher order centres such as GSTC for retail services beyond that envisaged by a Village Centre.</li> </ol> <p>It should also be noted that the Study's definition for Village Centre includes 6,000sqm of <i>nett lettable retail area</i>, which means that other activities that may locate in a centre (such as banks, real estate agents, travel agents, medical centres and local offices such as accountants, gymnasiums) would not be included in that 6,000sqm.</p> <p>In response to this submission, the consultants calculated the notional primary trade area for the Victoria Park Village Centre, which is forecast to grow to 25,250 people by 2021. Only 6,000-6,500 of these people (25%) are within the Victoria Park development, which means that the rest of the patrons will need to come from the catchment areas of other centres in the vicinity, including the GSTC. Many residents in Victoria Park's primary catchment will be closer to</p>

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		<p>4. The proposed hierarchy controls contradict other planning objectives – such as the existing vision in the current DCP – for active frontages and mixed uses.</p> <p>5. The restriction of retail development in nominated centres contradicts the Sustainable Sydney 2030 vision of creating connected communities.</p>	<p>GSTC and some residents of the Victoria Park trade area will travel in excess of 1.5km to visit the centre.</p> <p>4. A mix of uses are supported within activity centres, while ancillary retail uses as well as ground floor retail to activate streets is supported. The proposed retail hierarchy does not preclude this from happening; rather the hierarchy focuses on supermarket based centres and existing important retail nodes such as Dalmeny Avenue and Botany Road, Rosebery. The hierarchy and the proposed City Plan controls assume that new neighbourhood centres and small groups of shops will be developed where they are appropriate within the zone and where it can be demonstrated that they can be supported by a local demand.</p> <p>5. The Retail Study supports many 2030 objectives. The Study's nominated hierarchy of centres will support the creation of villages, and therefore communities, and also allow for the City to connect these planned centres with public transport, improved public domain and green links. A key aspect of the 2030 Vision is the evolution of the GSTC as the 'hub' for the southern areas. To ensure its success as a centre, excessive retail development immediately surrounding the GSTC should be limited, as recommended by the Retail Study.</p>
12.	<b>Redfern Waterloo Authority</b>	<p>1. Supports connectivity between the study area and the RWA area. With better connections between the two precincts, the RWZ also supports GSTC's potential to capture spending from the new residential and commercial populations envisaged in Redfern-Waterloo.</p> <p>2. Supports the work being undertaken between agencies on the Green Square TMAP and seeks to be included in similar partnerships.</p> <p>3. RWA also seeks to provide input in the preparation of the Green Square TMAP, given the implications for traffic and public transport in the RWA area.</p>	<p>1. Noted.</p> <p>2. Noted.</p> <p>3. Noted.</p>
13.	<b>Landowner</b>	<p>1. The submission generally supports the Study and the intent</p>	<p>1. It is considered that the GSTC would be best served if the majority of retail floor</p>

No.	From	Issues	Response
	<p>'Gazcorp' site, 296-298 Botany Road, Alexandria</p>	<p>to create a hierarchy of centres that supports the role of the GSTC. The submission argues however, that the Study's findings that the Gazcorp development would be to the detriment of the GSTC's viability are incorrect. Instead, it is submitted that the Gazcorp site complements the GSTC, and this is partially the reason the retail development was approved on this site. Argues that the Gazcorp site should be incorporated into GSTC.</p> <p>2. The Study underestimates the amount of retail floorspace supportable in the study area.</p>	<p>area was developed in an integrated, complementary manner and not separated by major arterial roads. At present there is no proposed above ground or below ground connection from the Gazcorp site to the GSTC. The City's peer review of the Gazcorp site's Economic Impact Assessment found that the sites would operate together as one centre if customers could travel between the sites. For the Gazcorp site to operate as part of an enlarged GSTC, patrons would need to easily and safely cross Botany Road. As measures to achieve this are not proposed, and given the nature of the intersection, it is considered that these two sites would operate separately and therefore compete with each other. The current application to increase the retail offer and floorspace on the Gazcorp site will further impact the viability of the GSTC, because the proposed shopping centre is more likely to serve all of a shopper's needs and people are less likely to visit the GSTC in the same trip.</p> <p>Given the proximity of the Gazcorp site to the GSTC, it was not considered appropriate in terms of retail hierarchy to separately identify the site as a centre type.</p> <p>2. Refer to Submission No. 3 for a response regarding the total retail floorspace supportable in the study area.</p>
<p><b>14</b></p>	<p><b>ALDI</b></p>	<p>1. As recommended in the recent Australian Competition and Consumer Competitiveness Commission (ACCC) inquiry, increasing competition between supermarkets should be considered in zoning and plan-making by all levels of government. The Retail Study should not employ a restrictive centres policy.</p>	<p>1. The ACCC recently held a public inquiry into the competitiveness of retail prices for standard groceries. In response to claims that planning and zoning laws act as barriers to the establishment of new supermarkets, the inquiry found that:</p> <ul style="list-style-type: none"> <li>▪ Zoning and planning regimes can act as barriers to new supermarkets being established because controls tend to protect existing centres which already have a Woolworths or a Coles site.</li> <li>▪ The current controls have little regard to competition issues (i.e. increasing competition and reducing the price of supermarket products) in considering zoning or planning proposals and the report recommends that these considerations are introduced in the planning framework to try and prevent greater concentrations of supermarket sites in the hands of Coles and Woolworths.</li> <li>▪ The ACCC recognised that zoning and planning policies are designed to</li> </ul>

No.	From	Issues	Response
			<ul style="list-style-type: none"> <li>▪ preserve public amenity and achieve other planning outcomes. It was revealed that existing supermarkets used planning objection processes to protect their opportunities for new stores and to protect existing business.</li> <li>▪ The inquiry also heard evidence that Coles and Woolworths “engage in deliberate strategies designed to ensure they maintain exclusive access to prime sites. In particular, both supermarket chains include terms in their leases which effectively prevent centre managers leasing space in centres to competing supermarkets”. This has been found to be a key reason for the increase in food prices.</li> </ul> <p>In response to the submission, it is considered that the Retail Study, or the translation of it recommendations into City Plan controls, does not contribute to the issue of lack of competition between supermarkets. Planning for, and encouraged mixed use centre develop is essential in planning for service, infrastructure and to protect amenity.</p> <p>Centres policy is also about achieving orderly and economic development. While new retail investment provides an opportunity for increased competition, this should have regard to the potential impact on existing investment that has been made by property owners, business owners and local Council. Orderly and economic development aims to reduce the potential of oversupply of retail space, which ultimately impacts negatively on existing investment made by investors and retailers, including small independent retailers.</p> <p>As identified in the ACCC report, one of the main reasons for reduced competition is the presence of restrictive leasing policies that prevent second supermarkets locating in existing centres. This issue cannot be dealt with through amendments to planning controls. One way the planning framework can support competition between centres is by providing for enough supermarkets in the area and by not restricting the types of supermarkets. The Study does not preclude this outcome in that the number of supermarket centres proposed would assume some competition, and does not preclude any particular brand or format of supermarket retailing.</p>

No.	From	Issues	Response
		<ol style="list-style-type: none"> <li>2. The Retail Study does not specifically identify the role of ALDI in the nominated hierarchy of centres.</li> <li>3. ALDI Stores can be managed to have fewer deliveries and a reduced impact on commercial or residential areas – which means that they can operate outside of centres (which is cheaper).</li> <li>4. A cap on the size of retail floorplates outside of the nominated centres is not supported.</li> <li>5. A land use category for 'small supermarkets' should be introduced for stores less than 1500sqm.</li> </ol>	<ol style="list-style-type: none"> <li>2. The purpose of the Retail Study was to estimate the amount of supermarket floorspace that is supportable. While this has been expressed in terms of the number of supermarkets, it is acknowledged that a mix of supermarket formats and sizes is appropriate, including full-line, limited-line, organic food markets and other formats. The Study does not preclude the presence of ALDI supermarkets, however, the existing approvals in the study area in the nominated locations are all for larger-sized supermarket centres (with the exception of the IGA in the Botany Road small village).</li> <li>3. The proposed City Plan LEP and DCP controls do not support supermarket development outside of centres, as stated previously.</li> <li>4. It is intended to limit the size of retail floorplates outside of the hierarchy of centres. This will encourage the development of the nominated centres and protect the future viability of the GSTC as a 'major centre'.</li> <li>5. In regard to introducing a definition for 'small supermarkets' the Standard LEP Template as set by the State Government does not include this definition, nor does it include a definition for 'supermarket'.</li> </ol>