Summary of Submissions

No.	Doc No.	Issues Raised
1	D00826310	• Generally supports Strategy - agrees with methodology to estimate retail floor space demand • Support a hierarchy of centres as a fundamental planning tool • Needs to be flexible in application to specific centres • Too great an emphasis on the regional centre at the expense of district centres (31% regional centre, 42% district centres) • None of the additional retail floor space for district centres (62,558m²) is allocated to Bay Village • 5,000m² of bulky goods till 2011 - then no expansion until after 2021 – doesn't allow long term competitiveness • Doesn't take into account need to compete with Erina Fair • Gross lettable floor space is 27,500m² retail plus 1925m² non-retail – not the 30,046m² outlined in the Strategy • 5,000m² is not enough bulky goods to be viable – require minimum bulky goods of 8000m² • Need an appropriate retail mix within proposed bulky goods precinct – approximately 3:1 – to make commercially viable. • DCP should provide flexibility for minor variation of floor space targets where a major benefit will be achieved • Bay Village need 8,000m² bulky goods with 3,000m² of retail floor space in the short term – achieved by a minor variation to the bulky goods target floor space • DCP should clarify that the minimum 10% non-retail floor space should only apply to the additional floor space component
2	D00830177	• Strategy does not factor in tourism expenditure for The Entrance – needs to be considered in carrying capacity for the town - Ensure tourism expenditure is not lost to other district centres • Flexibility should be provided in DCP for further detailed analysis of floor space requirements under an economic impact assessment – also to allow for change through time • Definition for non-retail services is vague – better to include a definition of retail services then whatever is not defined as retail services is defined as non-retail. • Non-retail services should include restaurants, convention facilities, reception establishment, child care, education establishment, recreation facilities (gym, spa, health clubs, etc) • No reference to the amount of undeveloped floor space already commercially zoned - is rezoning required to expand or reduce the capacity of any of the identified centres? • Strategy does not identify when the remaining 2,200m² of floor space for The Entrance is to be developed (states 8,000m² by 2011) • How will the allocated floor space for the centres be shared? How will applications be assessed if multiple development proposals are made at the same time for floor space in excess of the limits? How will applications be prioritised? • Any ancillary retail use throughout industrial areas needs to be monitored and controlled

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3	D00826318	• The Strategy does not clearly cross reference Council's strategies in relation to The Entrance, North Entrance/Long Jetty • How will the 8000m² of retail floor space for The Entrance be allocated (1st in best dressed)? • The 8000m² does not reflect the scope of development proposed by a number of prominent sites (ie. Picnic Point, Klumper, Fisherman's Wharf, Oway Site, Lakeside Plaza). • Traffic management issues need to be resolved to adequately address distribution of viable retail specific development • Strategy does not reflect the unique character of The Entrance and requires further review
4	D00837631	• Potential for amended population projections following Waterplan 2050 – may impact on the final Retail Strategy • Centres hierarchy should also be adopted for Wyong/Tuggerah Major Centre – if not the inconsistency should be acknowledged • REDES will provide a framework for business parks • Limited retailing in industrial areas should also be extended to the 4(c) Business Park Zone • Should refer and relate to other district strategies (ie. Wyong/Tuggerah, Ourimbah, and The Entrance). • Show how it will guide the preparation of the principal LEP. • The Department will guide the location of retail/commercial development and the application of standard LEP template zones to guide Council in finalising and implementing its principal LEP. • Council's current DLEP164 to amend Cl 59 to increase floor space at Wadalba should be extended to a complete review of Cl 59 in relation to recent approvals at both Wadalba and San Remo. • Future intentions in relation to the small centre at Warnervale East should be highlighted. • New village centres at Wadalba East, San Remo and Lake Munmorah are not identified in the draft CCRS – its premature to nominate specific sites prior to the North Wyong Structure Plan • The current Strategy can be interpreted as giving "in principle" support for specific proposals (ie Lake Munmorah) without detailed assessment, strategic planning for the surrounding area, or consideration of the future role of existing neighbourhood centres in these areas. • More appropriate to discuss alternative approaches to the allocation of floor space OR state this area is subject to detailed planning and this will determine scale/location of new centres • It's premature to commit to the WEZ business park. • Would benefit from an analysis as to the merits of floor space caps • Review in light of Catherine Hill Bay and Gwandalan proposals • Disclaimer to be inserted for HillPDA/PB 2005 Retail Report • Discuss tourism expenditure and try to quantify its impact • Need to ensure that floor space figures for each centre are accurately reflected. Particularly for Westfields Tuggerah, Tuggerah Supa Centa, Lake Haven and Bay Village

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5	D00826366	• New residential unit and resort developments have empty shops – 21 empty shops in The Entrance • Can not rely on 3 months of tourism to hold trade for the year • 3 markets on weekends take income from permanent retailers • Commercial office development needs to be increased • Lakeside Plaza is an important component • Traffic flow is a major concern • Proposal for 5,000m² at Long Jetty could be good for Long Jetty but have a negative impact on The Entrance • Must support existing shops first and not develop more
6	D00813502 D00867600	• Existing and future demand support additional retail opportunities beyond those identified • Undue weight given to "Warnervale" – contentious argument • Strategy will create ongoing limited access to retail facilities, limited competition or greater travel distance • Strategy limits retail opportunities to those identified historically or "re-badged" as Villages under the CCRS • Fails to recognise the potential role of Wyong Town Centre as a commercial and higher density hub • The Toukley Town Centre does not have its function or potential fully fleshed out in the DCP • Lake Haven is saturated with grocery provision – service to resident population can only be improved by competition • Strategy uses average sales rate of $8,500 per m² for supermarket sales – it is acceptable for stores to trade at $7,500 per m². – using this figure achieves an additional 3 supermarkets by 2031 – majority of shortfall in supermarket floor space will be in Northern Wyong • Create a current demand for 5 supermarkets in Warnervale/Wadalba area – allowing a supermarket at Wadalba East/Kanwal between 2011-2016 • After 2016 there will be demand for further 2-3 supermarkets – therefore Wadalba East/Kanwal could expand (ie. instead of the 1 supermarket proposed could be 2 supermarkets) • Instead of 50,000 persons to support a DDS, 35,000-40,000 persons should be considered in Wyong Shire due to lower provision of Department Store floor space – this will create a need for another DDS in Northern Wyong • Wadalba East/Kanwal Centre should be expanded to incorporate at least 2 supermarkets and a DDS • Floor space caps are subjective and inefficient – support a net community benefit approach instead
7	D00823126	• Lacks significant detail on transport and roads, the additional facilities that will be required to address the expected increase in traffic and pedestrian generation, and proposed funding sources • The variation criteria for expansion of existing retail centres must include an assessment of the likely traffic impacts so that any increase in traffic volumes on, and access to, the Classified Road Network are satisfactorily accommodated

No.	Doc No.	Issues Raised
8	D00826741 D00825596	• Is Lake Munmorah the best place for a large shopping centre? • Destroy the local shops in Lake Munmorah and Chain Valley Bay – become an empty shopping strip • The area will become a choice between Coles and Woolworths • Retail Hierarchy strongly supported • Proposals to "cap" Centre's retail floor space is commended • Given the important issue of proximity, may be appropriate to have a flat hierarchy of village centres rather than larger neighbourhood centres – more distributed approach may be preferable • How to meet demand? Single supermarket anchored centre? A series of convenience supermarkets located in close proximity to individual settlements may be a better option. • No justification for Lake Munmorah as a new village centre • Insufficient assessment to suggest bulky goods at Lake Munmorah – bulky goods should be at district level and above • Agreed with cap of 8,000m². for village centres and see no basis for Lake Munmorah to exceed this level • Neighbourhood, village and district centres should be a minimum 1.6km apart, giving an immediate catchment radius of 600m • If a single village centre is needed for the Northern Lakes area, it should be more central to the area then Lake Munmorah (between Gwandalan and Lake Munmorah) – a more northerly location would be favoured to complement rather than compete directly with the existing neighbourhood centres • Alternative is to have two new neighbourhood centres – one in the northern part of the Northern Lakes, the other in the southern part. Each located so as to protect the role and function of the current shopping facilities.
9	D00830018	• Future retail planning should not compromise the economic and social health of existing neighbourhood shops • Developments on the Pacific Highway will damage the prosperous small local centres that have taken years to establish • Existing and proposed retail centres provide more than sufficient consumer variety (ie. Budgewoi, Toukley, San Remo, Charmhaven)
10	D00828314	• The development at Gwandalan for a supermarket and speciality shops should not be considered until the residential proposal is approved • A new shopping centre at Gwandalan will adversely affect the existing retail centres of Gwandalan and Summerland Point – also could jeopardise the viability of the recommended 5,000m². of retail floor space for Lake Munmorah • The new village centre at Lake Munmorah and the existing centres at Gwandalan and Summerland Point are adequate to service the area and absorb more growth to meet the needs of the proposed additional residential population • If Gwandalan needs a larger supermarket, the existing shopping centre should be increased, but not until after 2011 • The proposed site adjacent to the roundabout on Kanangra Drive is not appropriate being across from the sewer treatment plant

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11	D00824333	• Support the DCP proposal for a second supermarket in Toukley • May have an ideal site for the second supermarket
12	Various	• Want the local shops to stay • Council should not consider any alternative land use • Any community facilities to complement not replace local shops • Council should improve the lighting, increase parking spaces, level the ground and beautify the shopping strip at Liamena Ave.
13	D00828814	• San Remo shops (Liamena Avenue) should be allowed to stay and the shopping facilities improved (lights, bike racks, parking, etc.) • Any alternative land uses should complement but not replace the existing shops • Council should keep San Remo shopkeepers informed on matter affecting their livelihood
14	D00824925	• Floor space limit of 10,000m² bulky goods at Tuggerah is an undersupply – more appropriate level is in excess of 30,000m² • Current provision of bulky goods floor space in Wyong Shire is 0.27m² per person – in Australia its approximately 0.6m² per person – as such Wyong Shire could support in excess of 90,000m² of bulky goods (50,000m² more than Strategy) • Survey indicates significant number of residents are shopping at Erina, Gosford and West Gosford for their bulky goods • Bulky goods accounts for 9.5% of retail sales in Wyong Shire – in Australia it is typically 20% • Does not take into account the adequacy of existing stores and retaining escape expenditure – therefore the supportable level of bulky goods floor space is underestimated as it assumes at least 50% of bulky goods spending will continue outside the Shire • Forecasts expressed in 2005 dollars – should be in 2007 dollars • Strategy uses a figure of $4,000 per m² for bulky goods spending – accepted average is $3,000-$3,500 per m² • Using 20% of spending and $3,500 per m² results in a floor space of 57,660 m². (33,450 m² more) • Our calculations indicate 50,000m² of bulky goods floor space is needed to capture existing escape spending and 57,000 m². to support population growth – Strategy recommends 43,000m² (difference is 60,000 m²) • Tuggerah Regional Centre must be recognised as the major destination for bulky goods in Wyong Shire • Replace current valuation with new evaluation tests that take into account Fabcot Principles and Net Community Benefit • Relevance of survey data – 2 years old – provide no information on frequency of visits to the centres – more extensive survey needed • 2006 Census data should be used • 500m² limit on office space in WEZ will impact on its success – decrease to 200m². as per Tuggerah Business Park • Strategy is ambiguous in relation to Council's Wyong/Tuggerah Strategy which outlines Bryant Dr for rezoning to bulky goods – no accommodation of this additional bulky goods floor space

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15	D00826337 D00826572 D00826308 D00829146	• Support a new Retail Strategy to identify/maintain a hierarchy of centres and provide objectives/functions for each of the centres • The trade area for the Tuggerah Regional Centre is incorrect • Discrepancy in the definition of retail floor space • Underestimate the market by 30% and future market growth by 5% • Underestimate market capacity for additional retail floor space • Decisions must take into account strategic planning for the only other regional centre on the Central Coast, being Erina Fair (which has minimal restrictions) • Numerical caps place unnecessary restriction on expansion and are based on flawed analysis of trade market and retail growth • Tuggerah Regional Centre should be pre-dominant, pre-eminent. • An agreed masterplan is unreasonable and onerous and is not inflicted on any other retail centre on the Central Coast • Will create a potential job loss and is a threat to ongoing investment and employment growth • The draft Strategy overstates the current provision of retail floor space at Westfield Tuggerah by 10,000m² (states 80,000m². where it's only 68,000m²) – on this basis there is current provision for another 12,000m². • There is a need for detailed review of floor space figures • Retail market is 30% larger – floor space caps and timing are based on inaccurate understanding of the size of the retail market – can develop larger and earlier than indicated • 1% retail growth is conservative – 1.5% is a more reasonable • No discussion if Wyong is over/under supplied in retail floor space • Markets other than households have not been accounted for • Need to capture escape expenditure – no mention of this • Role of Tuggerah Regional Centre and Westfields is downplayed • Westfield Tuggerah trade area extends beyond Wyong Shire • Prevents a 2nd department store for another 20 years and blocks out the addition of Myer • Erina Fair will capture development not permitted at Tuggerah • Needs flexibility to respond when market opportunities exist
16	D00824677	• The Lake Munmorah Shopping Centre rezoning should be included in the proposed/mooted development section of the Strategy • A retail facility at Lake Munmorah may now be required to be larger than first anticipated to meet demand from residential development at Gwandalan and Catherine Hill Bay • Clusters of small retail centres may be outweighed by one central facility • Other land holdings to the north of Lake Munmorah could be considered for a mix of commercial, business, light industrial and residential zonings

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17	D00827587	• DCP to provide more flexibility to respond to growth patterns • The analysis has not factored in tourism expenditure • Population projections are based on ID consulting data and are not consistent with the Draft CCRS figures – highly optimistic • Mixed use needs to be carefully monitored and controlled to ensure higher order retail uses do not permeate industrial areas • Premature for Council to finalise draft DCP prior to finalisation of draft CCRS. Draft CCRS and Stage 1 North Wyong Structure Plan to be release mid year and will demonstrate the likely areas for development in their staging – inconsistent documents will further confuse and delay development • Population within the Lower Hunter area that adjoins Wyong Shire to the north has not been considered • Averaging by Leyshon should be subject to further analysis • Apply flexibility within the DCP to allow existing and proposed centre locations and size to be reassessed as required • 1% annual growth rate is considered conservative • Despite identifying a top heavy hierarchy the same distribution of spending has been applied to the demand for retail floor space • Important that trends identified in the Strategy which resulted from lack of competition do not continue to direct the distribution and location of retail centres (ie. Lake Haven) • What is the ability for existing centres to accommodate the physical increase in size nominated by the Strategy?
18	D00844820	• Issues with the survey data – number of responses per suburb was not set according to the population of each suburb, frequency of visitation and spend per visit was not collected, relatively small sample size, trade areas are applied for all types of retail, and no data as to the volume of retail sales directed to each of Wyong's centres by customers living outside the Shire • Use of ABS household Expenditure data is not best practice – information supplied by MDS (MarketInfo) is widely used • No definition of what constitutes "retail" • 1% real growth in spending is conservative – statement that this is applicable to Wyong Shire is misleading as even though Wyong average income levels are 18% below the Australian average, retail spending levels are only 3% below the Australian average. The unemployment rate of 5.6% is not substantially higher than 5.1% for NSW and 4.6% for Australia. Ageing is not consistent throughout the Shire. • Does not take into account continuing and increasing demand from non-residents of Wyong Shire – approximately 16.7% of sales at Wyong Retail Centres are from residents outside Wyong Shire • Estimate of the proportion of resident spending for bulky goods at 9.6% is far below the Australian average of nearly 20% • Unexplained inconsistencies within various tables and commentaries within the Strategy • Bulky goods in northern part of the Shire is significantly underestimated – different calculations could increase required bulky goods floor space by an additional 30,000m². over the next 25 years

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19	D00829146	• Floor space caps are too rigid for long term planning – arbitrary, subjective, inflexible and do not account for retail trends changes • The “no expansion” timed restriction will exacerbate the decline of centres such as Wyong Town Centre • Population projections are outdated. 2005 census should be used • Estimating supportable floor space through a notion of “required” turnovers is highly subjective – figures have no justification • No measures to capture escape spending • Too prescriptive in non-retail floor space – many centres do not know tenancy at time of DA. Leave to market demand • Floor space caps oppose the net community benefit approach • Inconsistent with Draft Central Coast Regional Strategy, does not contribute to achieving employment targets • Too focused on prohibitive measures and time restrictions. Fails to control streetscape, pedestrian amenity, place creation • Could open Council to legal challenge regarding restriction of trade, DCP prohibition inconsistent with the Wyong LEP • Preclude Lake Haven for 15 years from any significant response to growing demand or increasing competition – both Erina and Tuggerah are certain to expand again over the next decade • Residents are not provided with the range of retail facilities which they could support in close proximity to their homes • Strategy states that each development should be assessed on an individual basis using a net community benefit analysis • Unable to determine “correct” turnover level for every centre • 16-21% of retail expenditure is still allowed to escape – does not consider the adequacy or supply of existing retail floor space • Assumes Regional and District Centres will account for a lower proportion of future demand as compared to current demand • Additional DDS supported in North Wyong • Survey date outdated, simplistic, more extensive survey needed • 2006 census data should be used • Figures should be shown in 2007 dollars not 2005 dollars • No analysis of supportable retail as a result of tourist spending