

Attachment D

Summary of Submissions and Responses

Community submissions

Submissions were received from 11 members of the community.

Summary of key matter raised in submission	Officer's response
<p><u>Support for expanded retail area</u> (raised in 8 submissions)</p>	
<p>Eight submissions expressed general support for the proposed expanded retail area (North Alexandria). Key reasons for support include:</p> <ul style="list-style-type: none"> • an appreciation that the planning proposal will allow locals to walk to large format retail instead of having to drive to shopping centres further away; • an increase opportunity for larger retail will complement current opportunities in the area; and • it will create more opportunity for retail in walking distance of densely populated areas. 	<p>Support for the planning proposal is noted.</p>
<p><u>Parking and loading zones</u> (raised in 3 submissions)</p>	
<p>Three submissions raise the need for more diverse forms of parking and loading needed to support retail development, including:</p> <ul style="list-style-type: none"> • short-term parking; • cargo bike parking (wider cycle parking); • drop-off zones; • waiting zones; • loading zones; and • kiss and ride facilities. <p>One submission suggests that larger cargo bikes could help to replace car trips and reduce traffic in the area.</p>	<p>This planning proposal, while primarily focused on expanding opportunities for supermarkets in the Green Square Area, also includes provision to amend the Sydney LEP to introduce a maximum parking rate for retail with a combined gross floor area greater than 2,000 square metres.</p> <p>More detailed provisions related to parking and loading are included in the Sydney DCP 2012 and do not fall within the scope of this planning proposal.</p> <p>This submission has been referred for consideration in the broader review of the City's LEP and DCP controls.</p>

Summary of key matter raised in submission Officer's response	
<u>Road and footpath infrastructure</u> (raised in 2 submissions)	
<p>Two submissions raise concerns about the road and footpath infrastructure in the proposed expanded retail area.</p> <p>One submission expressed concern about how the council plans to manage an increase in traffic and whether the existing roads and footpaths can safely accommodate the additional traffic when it consists of a wide range of users including cyclists and trucks.</p> <p>The other submission raises the need for an improved cycling network to improve accessibility, particularly east/west connections.</p>	<p>Locating supermarkets in centres and close to dense residential communities reduces the need for people to drive to supermarkets outside the area. The proposed changes do not increase the total retail floor space permitted overall hence minimal changes to traffic impacts are expected. Additionally, each development will also be required to assess pedestrian and traffic impacts as part of the subsequent development application process. The following initiatives will also improve the road and footpath environment in the area:</p> <ul style="list-style-type: none"> • City of Sydney Cycling Strategy and Action Plan; • provision of east-west public/active transport link from Erskineville and Green Square Town Centre currently under construction; • land dedication requirements in North Alexandria as sites are redeveloped will widen paths and create new streets and lanes; • Green Square and Waterloo Transport Action Plan; and • behaviour change campaign at Green Square to encourage sustainable transport use.
<u>Support for more diverse retail types in the extended retail area</u> (raised in 2 submissions)	
<p>Two submissions request more diverse forms of retail be provided in the area, specifically clothing stores and unique shops.</p>	<p>The expanded retail area will encourage the creation of additional retail floor space. This provides opportunity for new types of retail to emerge.</p> <p>Large supermarkets are important anchors for smaller retail, often forming the nucleus of local centres where people come to grocery shop, but also visit smaller surrounding shops while there.</p> <p>As more supermarkets locate in the area, it will create opportunities for smaller and more diverse forms of retail to be provided.</p>
<u>Support for parking caps for large retail</u> (raised in 2 submissions)	

Summary of key matter raised in submission	Officer's response
<p>Two submissions support the implementation of a parking cap for large retail to manage parking demand and encourage alternative modes of transportation, such as walking, cycling, and public transit.</p>	<p>Support is noted.</p>
<p><u>Support for more entertainment in the extended retail area</u> (raised in 1 submissions)</p>	
<p>One submission request more music venues and small bars and such in the expanded retail area.</p>	<p>This planning proposal is to primarily to increase opportunities for supermarkets in the extended retail area and is not related to the provision of entertainment venues.</p> <p>Notwithstanding this, the City has revised controls in the North Alexandria area in the past few years to create opportunities for music venues and small bars by maximising trading hours and supporting the delivery of an enhanced public domain.</p>
<p><u>General support for existing retail policies</u> (raised in 1 submissions)</p>	
<p>One submission expressed general support for the City's existing retail provisions, including the cap on retail floor space.</p> <p>The submission cited the benefits of the existing retail cap, which has allowed larger spaces to be occupied by indoor recreation facilities.</p>	<p>Support for the City's existing retail provisions is noted.</p> <p>This planning proposal is to primarily to increase opportunities for supermarkets in the area and is not directly related to the provision of community facilities / sporting facilities.</p> <p>Notwithstanding the above, it is noted the City has acquired land in the North Alexandria precinct to meet the shortage of recreation space/sporting facilities in the area.</p> <p>While removing the floor space cap from the expanded retail area will provide opportunities for larger retail, indoor recreation facilities are already permitted across large parts of the southern enterprise area.</p>
<p><u>Preference for smaller retail over large retail</u> (raised in 1 submission)</p>	
<p>One submission suggests that small and unique businesses are preferred over larger businesses in the area.</p> <p>The submitter notes that larger businesses make it harder for small businesses to compete and takes away from the area's character.</p>	<p>The Review supporting this planning proposal examines whether there is enough space available based on existing planning controls to address the lack of retail options.</p> <p>It found that while small retail stores are permitted under the planning controls, there isn't sufficient opportunity for larger retail</p>

Summary of key matter raised in submission	Officer's response
<p>The submission cites the success of Gadigal Avenue in Waterloo as an example of the benefits of small floor plate retail.</p> <p>The submitter suggests that the trend in the area is towards smaller floor plates and mixed-use streets, attracts different stores.</p>	<p>spaces, in particular supermarkets, in the Town Centre.</p> <p>Large supermarkets are important anchors for smaller retail, often forming the nucleus of local centres where people come to grocery shop, but also visit smaller surrounding shops while there.</p> <p>As more supermarkets locate in the area, it will create opportunities for smaller and more diverse forms of retail to be provided.</p>
<p>Shortage of schools in the wider Green Square area (raised in 1 submission)</p>	
<p>One submission raised concerns regarding a shortage of schools in the area, suggesting the need for new schools or expanded schools to accommodate the growing population.</p>	<p>This planning proposal is to primarily to increase opportunities for supermarkets in the area and is not related to the provision of schools in the area.</p> <p>Notwithstanding this, a new Green Square public school is currently under construction by the Department of Education for 600 students. It will offer shared facilities with the community such as basketball and other sports. The 600 spaces supplement the 1,000 primary and 1,200 secondary students at the Alexandria Park coeducational school recently rebuilt for more than \$100 million.</p>
<p>Impact on vibrancy and amenity of area (raised in 1 submission)</p>	
<p>One submissions requests that large floor plate retail demonstrate how they will add to the vibrancy and amenity of the area.</p>	<p>The draft Planning Proposal includes a draft Clause to require all retail in the expanded retail areas to front a public place and to locate the primary entry so that it is from a public place. The intent of the proposed control is to prevent 'inward' facing retail, such as shopping centres or malls.</p> <p>The inclusion of this control will ensure that retail contributes to the vibrancy and amenity of the area by activating and enhancing the public domain.</p>
<p>923-935 Bourke Street Waterloo Planning Proposal (raised in 1 submission)</p>	

Summary of key matter raised in submission	Officer's response
One submission refers to the 923-935 Bourke Street planning proposal, exhibited at the same time as this planning proposal, noting that it is outside of the expanded retail area and it shouldn't be supported.	In relation to the 923-935 Bourke Street planning proposal, the appropriateness of retail at this location has been addressed in the post-exhibition Council report for this planning proposal. In summary, the planning proposal addresses the shortfall of supermarket floor space in the Waterloo area.

Landowner submission - 1-3 Rosebery Avenue

A submission was received from a landowner located outside the expanded retail area.

Summary of key matter raised in submission	Officer's response
<u>1-3 Rosebery Avenue, Rosebery</u>	
<p>Supports key elements of the Retail Review including:</p> <ul style="list-style-type: none"> • updated population projections • retail clustering definitions • the need to deliver a holistic supermarket and retail network • support for reviewing the study every five years. 	<p>Support for key elements noted.</p>
<p>States that Rosebery North is identified as a retail cluster/centre.</p>	<p>The identification of Rosebery north as a retail cluster does not refer to a designation of a level in a Centre hierarchy.</p> <p>The Study says (Page 52) that 'It is important not to conflate 'retail clusters' and 'retail centres'. Retail clusters are used for modelling purposes only.</p>
<p>States that supermarket accessibility mapping completed in the review shows that there are a number of recognised gaps, including Rosebery North.</p> <p>States that Rosebery and the southern areas of the village are only served by two small supermarkets (of less than 1,000m² each), with no large or standard supermarket provided in the area (existing or proposed).</p>	<p>The Rosebery accessibility gap was shown in Figure 15 of the Study. Note that there are significant sites yet to be developed which will fill this gap.</p> <p>The planning proposal for the Suttons Site in Epsom Park was endorsed by Council for finalisation in June 2023. It includes provision for a 1,200 square metre supermarket.</p> <p>If 1-3 Rosebery Avenue includes a small supermarket in its redevelopment, it will mean that there will be two new supermarkets in addition to the two existing supermarkets in the area. This will be enough to close this accessibility gap without the need for a large supermarket that will detract from the identified centres.</p> <p>The retail cap encourages a more dispersed pattern of smaller supermarkets and ancillary retail for day-to-day needs with larger supermarkets supporting identified centres. This pattern enables for more people to be within walking distance of a supermarket while also supporting the vitality of major centres, such as the Green Square Town Centre.</p>

Summary of key matter raised in submission	Officer's response
<p>The submission refers to the significant population growth forecast in Green Square and City South, specifically the concentrated development occurring around the Rosebery North area.</p> <p>The submission estimates that within 500 metres of the subject site, around 5,222 additional dwellings or 10,000 people are forecast based on recent completions and known developments.</p> <p>Based on this projected growth and the additional supermarket expenditure this would generate, it projects that this could support two large supermarkets.</p> <p>The level of additional retail expenditure suggests that new retail facilities should be accommodated to support growth in the community and a holistic retail hierarchy in the Green Square and City South Village.</p>	<p>The Green Square and Southern Areas Retail Review was completed in 2022. The City prepared a planning proposal and draft DCP, responding to the recommendations of the review to remove the retail floor space cap to the west of Green Square Town Centre.</p> <p>Projected dwellings, population growth and anticipated supermarket expenditure per capita has all been factored in as part of the Review.</p> <p>The Review identified the need for an additional 9,256sqm of supermarket floor space to 2041 with an existing shortfall of 2,112sqm. This figure is in addition to a number of supermarkets in the study area that are approved but not yet built.</p> <p>The Retail Study did not recommend removal of the retail cap on or near the submitter's site as it was not identified as a retail centre and there was only a small forecast of under provision of supermarket floor area in the "Rosebery North" cluster.</p> <p>Forming a centre with a larger supermarket at this location contradicts the recommendations of the Retail Study and is not supported. However, delivery of a smaller supermarket is considered acceptable and consistent with the recommendations of the Retail Study.</p>
<p>Highlights strong potential for additional retail and supermarket floor space in Rosebery, with the subject site at 1-3 Rosebery Avenue ideally positioned due to its central location within the identified Rosebery North cluster.</p>	<p>The planning proposal creates no impediment to the provision of a small supermarket at this site.</p>

Public Authority Submissions

The following public authorities were contacted:

- Transport for NSW
- Transport Asset Holding Entity of New South Wales
- NSW Environment and Heritage (EHG)
- Fire and Rescue NSW
- Airservices Australia
- Sydney Airport
- Civil Aviation Safety Authority

Transport Asset Holding Entity of New South Wales and Fire and Rescue NSW declined to provide comment on this proposal.

Summary of key matter raised in submission	Officer's response
Transport for NSW	
<p>Supports the planning proposal as:</p> <ul style="list-style-type: none"> • it provides an appropriate mix of uses in a highly accessible area, serving the growing population and reducing the need for private vehicles; • the existing 1000 square metre retail cap in the expanded retail area limits retail options, forcing residents to drive to other retail centres and increasing traffic congestion on the local road network; and • the public domain and active transport opportunities facilitated by the recently finalised Enterprise Area Review proposal would complement the new opportunity for large format retail and support sustainable travel behaviour. <p>TfNSW recommends that Council:</p> <ul style="list-style-type: none"> • consider integrating future cycleways in the study area with the Eastern Harbour City Strategic Cycleway Corridors in consultation with TfNSW; • provide measures that contribute to the City's target for future sustainable transport mode use when assessing development applications; • consider its Freight and Servicing Urban Last Mile Toolkit to give consideration and guidance to proposed freight and servicing demands for high density urban areas; and • contact Sydney Metro/Trains and Transport Asset Holding Entity early in the design process as part of assessing development 	<p>Support for planning proposal noted.</p> <p>Recommended projects and actions to improve connectivity in and around this precinct and to promote sustainable transport use are noted and have been referred to the City's Transport team.</p> <p>The City continues to work with Transport for NSW to align our bicycle network to the Eastern Harbour City Strategic Cycleway Corridors.</p> <p>The City assesses transport impacts as part of the development application process. Proponents are encouraged to demonstrate how they will contribute to meeting the City's travel targets as set out in Sustainable Sydney 2030-2050, including 10% cycle mode share.</p> <p>The City has rates for loading and servicing spaces in our DCP that we ask developers to incorporate into proposals. However, the City frequently uses the Freight and Servicing Last Mile Toolkit to cross check advice and to provide other guidance on managing the freight task.</p> <p>The City will continue to work with TAHE, Metro and TfNSW on all development applications in the metro rail corridor.</p>

applications on land in the metro rail corridor.	
Heritage NSW	
<p>Expanded retail area contains two local heritage items. Council is the consent authority responsible for the assessment and consideration of any impacts regarding local heritage.</p> <p>States there are no identified impacts on any Aboriginal objects or places and/or State Heritage Register items or historic archaeology.</p>	<p>The submission is noted. No changes to the planning proposal and draft DCP, as exhibited, are recommended in response to this submission.</p>
Sydney Airport	
<p>The Obstacle Limitation Surface for Sydney Airport over the site is 156m AHD.</p> <p>It states that any proposed development designed to be taller than the Obstacle Limitation Surface (including construction cranes) may not be approved under the Airports (Protection of Airspace) Regulations 1996.</p> <p>Approval to operate construction equipment (i.e. cranes) should be obtained prior to any commitment to construct.</p>	<p>The submission is noted.</p> <p>No further action is required as there is no proposed increase in height.</p>
Civil Aviation Safety Authority	
<p>There is no proposed increase in height.</p> <p>CASA has no objection to the proposal as presented.</p>	<p>The submission is noted.</p> <p>No further action is required.</p>
Airservices Australia	
<p>Airservices have no specific comments to make on rezoning proposals or any particular aspect of this proposed redevelopment.</p> <p>Subsequent development proposals may require a separate assessment.</p>	<p>The submission is noted.</p> <p>No further action is required.</p>