



Our Ref: 14152

17th October 2014

Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Att: Mr Bruce Colman (Project Manager)

Dear Sir

RE: DRAFT WYONG LEP 2013 AMENDMENT – Westfield Tuggerah and Gateway Site

We act on behalf of Scentre Group Limited, the owners and operators of Westfield centres in Australia and New Zealand. This letter constitutes a submission to the recently exhibited provisions for the 'deferred land' of the Draft Wyong LEP 2013.

We are writing to support the proposed rezoning subject to a number of relatively minor mapping amendments required to reflect the intent of the both the indicative commercial and ecological outcomes for the land. An overlay of indicative development has been undertaken across the exhibited Draft LEP zoning map and an amended zoning map that been prepared by Scentre Group to reflect the required changes as illustrated in **Appendix A**. An overview of the changes is discussed below:

Proposed B3 and B4 zoning

Further to our original submissions to Draft Wyong LEP 2013, it is our opinion that the Westfield site should be zoned B3 Commercial Core. The proposed B3 Commercial Core zoning with proposed amended objectives supports the historical role of the Westfield site and the significance of the Wyong/Tuggerah Major Centre. A strong and vibrant Westfield Tuggerah will ultimately reinforce the regional role of Wyong/Tuggerah and Wyong CBD. Westfield Tuggerah is not specifically competing against other centres in Wyong LGA – its main competitor is Erina Fair (in Gosford LGA) and other wider regional centres to the north (ie Lake Macquarie/Newcastle LGA's) – it supports the hierarchy of centres within the Wyong LGA.

The proposed B4 Mixed Use zoning for part of the Gateway site will provide a range of uses in the future on the land that will complement the existing Westfield site. From our review of the draft land use table for B4 Mixed Use, the zoning will allow for bulky goods and retail premises on the subject land. For example, it is noted that Costco/Ikea land uses have been deemed to be a 'retail premises' by the Department of Planning and the B4 zoning will allow this and other type of large format retail uses in the future without the need for a site specific zoning amendment. A B4 Mixed Use zoning of land immediately adjacent to a major commercial centre is consistent with State government "Activity Centres" planning policy of providing opportunities for land immediately adjacent to centres before encouraging "out-of-centre" development.

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The B4 Mixed Use zone is considered appropriate for the Gateway site in providing:

- Mixture of compatible land uses;
- Integration of mix of uses in accessible location (particularly with opportunity of connections to new regional bus interchange approved on Westfield site);
- Development that supports and complements the retail functions of the Westfield site;
- Minimise conflict between land uses (ie. provides an appropriate transition of development to not only the Westfield site but also the likely future residential development of the remainder of the Gateway land).

The proposed B4 Mixed Use zoning is consistent with state, regional and local planning policies that have identified this land for future centre support retail development for over 20 years. The proposal is consistent with the Central Coast Regional Strategy, Draft Sub-Regional Strategy and Wyong Shires Retail Centres Strategy.

Minor mapping amendments are required to the proposed B4 land as illustrated in the figures in **Appendix A**.

As discussed with the Department of Planning, the size of the proposed B4 land needs to be capable of providing adequate area for the siting of large footprint bulky goods and retail premises including landscaping, riparian corridor, parking and access areas. The total area for the footprint required to accommodate the indicative development and other areas assessed within the planning and ecological reports is 13.85 ha. The 13.85 ha of B4 land includes 13 ha on the Gateway land and a similar zoning over the public road reserve (Tonkiss Street) which equates to around 8,500 sqm.

A footprint of indicative development has been overlayed onto the draft zoning map for the Gateway site and illustrates a number of minor mapping changes required to the dimensions of the B4 land. The modified zoning as illustrated in Appendix A allows for the proposed 25 m wide riparian corridor, a 10 metre setback from the transmission line easement extending through the Gateway land, parking and access areas.

E2 Conservation land

As outlined in the exhibited Planning Report, the proposal will allow the clearing of some isolated or disturbed edges of larger stands of vegetation on the Gateway site, with appropriate offsets by consolidating the E2 Environmental Conservation areas at the rear of both the Westfield site and Gateway land. In this regard Section 7.4.1 of the GHD report states as follows:

The offset proposed for the Westfield Tuggerah and Gateway site involves the establishment of an E2 zoned ecological corridor along the rear of the site as indicated in Figure 11, and includes:

- Establishment of an E2 Environmental Conservation zone within Area 3 east of Tonkiss Street through the rezoning of approximately 3.16 ha of native vegetation currently zoned 3(a) Commercial and 7(a) Environmental Protection
- Establishment of an E2 Environmental Conservation zone within Areas 1 and 2 through the rezoning of approximately 2.11 ha of native vegetation and disturbed lands currently zoned RU6 Transition and 7(a) Environmental Protection; and
- Rehabilitation of 0.31 ha of cleared land and disturbed vegetation within the proposed E2 corridor west of Tonkiss Street to restore native vegetation, enhance connectivity and thereby improve biodiversity values within the offset site.



The proposed mapping needs to be amended to correctly reflect the findings and recommendations of the GHD report in regard to the provision of the E2 corridor of land at the rear of the subject land.

The mapping also needs to reflect the GHD alignment of the E2 boundary at the rear of the existing Westfield site which has been determined through careful analysis of the most recently approved development application for a new bus interchange at the rear of the site as well as considerations for future infrastructure, parking and access requirements to the rear of the land.

The proposed modifications are illustrated in the amended zoning map in **Appendix A**.

Correction to Equivalent zone mapping adjacent to Gavenlock Road.

The proposed zoning map placed on exhibition for the existing Westfield site, illustrates an incorrect transition to equivalent zones in the south eastern corner of the subject land. The exhibited map currently extends R1 General Residential zoning over properties within the site that are currently zoned 3a Commercial. These properties need to be correctly rezoned to B3 Commercial Core.

Consistent amendments to other statutory maps under the Draft Wyong LEP amendment

It is noted that other maps on exhibited for the 'deferred land' include:

- Amended Wyong LEP Acid Sulfate Soils Map
- Amended Wyong LEP Flood Planning Map
- Amended Wyong LEP Lot Size Map

These maps will need to be reviewed and amended to be consistent with the final zoning map.

We thank you for your attention to the above matters. Please do not hesitate to contact us or Mr Chris Campbell from the Scentre Group if you need to discuss anything further in respect to this matter.

Yours faithfully

INGHAM PLANNING PTY LTD



APPENDIX A

Amended Draft Wyong LEP Zoning Maps
Amended LEP Zoning Map (Scentre Group)

Tuggerah - Proposed New Land Zoning Map

