



Our Ref: 16015

24th February 2016

Department of Planning and Infrastructure
23-33 Bridge Street
PO Box 39
SYDNEY
NSW 2001

Attention: Strategic Planning Department

Dear Sir/Madam

RE: DRAFT HUNTER REGIONAL PLAN AND DRAFT PLAN FOR GROWING HUNTER CITY

We act on behalf of Scentre Group the owners and operators of the land known as Westfield Shopping Centre, Kotara.

This submission is a formal submission and objection in respect to the failure of the Draft Hunter Regional Plan and the Draft Plan for Growing Hunter City to recognise Kotara as a key strategic centre within the Lower Hunter region (see map extracts in Appendix A).

The Draft Hunter Regional Plan identifies goals, directions and actions to guide strategic planning for land use and infrastructure across the whole of the Hunter region, including the metropolitan area. The Draft Plan for Growing Hunter City applies specifically to the metropolitan area and includes parts of Lake Macquarie, Maitland and Port Stephens LGA and all of the Newcastle LGA.

Existing centres are a major contributor to the amenity and economic welfare and growth of the Hunter Region and the State of NSW. They are of such importance that we believe planning policy and legislation that may impinge on the orderly growth and development of centres needs considerable research, careful analysis and justification.

A failure to properly recognise the role and function of the established sub-regional centre of Kotara in the draft plans is a complete failure to recognise the established planning context, retail hierarchy and metropolitan structure of Newcastle and the Hunter Region.

It is considered that the current draft strategies are inconsistent with established State and local planning instruments, policies and strategies that have existed for over 35 years which clearly recognise the sub-regional role that Kotara plays within the Hunter region.

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BACKGROUND TO KOTARA

Kotara is clearly a major sub-regional centre in the Lower Hunter Region with over 120,000 sqm of retail, bulky goods and commercial floor space along with a mixture of residential development, educational establishment and open space areas, community and entertainment facilities etc.

Kotara has commercial office space fronting Park Avenue and Northcott Drive, a large expanse of industrial land immediately adjoining the railway line and a large tract of land owned by Hunter Water fronting Northcott Drive. Kotara is well served by public transport with direct connections to the regional bus network and to the Kotara railway station.

Westfield Kotara is located on a large parcel of land located within the Kotara Town Centre and is bounded by Northcott Drive, Park Avenue, Lexington Parade and Hudson Park to the south. The existing centre is a fully enclosed two-level modern shopping centre, anchored by a David Jones department store, Kmart discount department store (DDS), and Coles and Woolworths supermarkets. Garden City also includes a number of mini-major tenants (eg. Best & Less and Toys'R Us) and numerous specialty stores.

Westfield Kotara is situated between the Newcastle CBD 6 kms to the north-east and Charlestown Square regional shopping centre located 3.5 kms to the south-west, with these three centres being the key shopping destinations within metropolitan Newcastle. Westfield Kotara is within Newcastle LGA and Charlestown Square is within Lake Macquarie LGA.

Retailing is a primary land use in any successful major centre. In regard to the Hunter Region, both Westfield Kotara and Charlestown have been historically identified in planning policy as being sub-regional centres. Both major centres continue to play a significant role in the economic growth and development of the Hunter Region. A comparison review of Westfield Kotara and Charlestown Square is provided in Appendix B.

Westfield Kotara performs a sub-regional role in the hierarchy of retail activity in Newcastle and in this regard is second only in importance to Newcastle CBD. The primary trade area for Westfield Kotara includes suburbs such as Kotara, Adamstown, Adamstown Heights, Merewether, The Junction, New Lambton, Kahibah and parts of the suburbs of Broadmeadow, Lambton, and Charlestown.

In November 2004, Newcastle Council gave development consent for a major retail expansion at Westfield Kotara including an additional 24,000 sqm net lettable floor area, eight cinemas with a total seating of 1,750 persons, 595 additional car parking spaces and modified vehicle access arrangements.

A number of additional development applications have been approved for this major regional centre since 2004. The most recent completion of project works on the site includes the operation of a \$55 m outdoor dining and entertainment precinct, including the Event cinema complex with rooftop restaurants and lifestyle tenancies.



In addition to Westfield Kotara, in late 2000 the Kotara Homemaker Centre was completed on land opposite Westfield Kotara (previously known as the Bradmill industrial site). This centre has approximately 29,000 sqm of floor space and incorporates over 20 tenants including BBC Hardwarehouse, The Good Guys Discount Warehouse, Dick Smith and Go Lo Discounts. This major bulky goods retail complex, further reinforces the Kotara Centre as a major centre for the residents of Newcastle and the Lower Hunter Region.

OBJECTION TO THE PROVISIONS OF DRAFT PLAN FOR GROWING HUNTER CITY

1. Kotara is not identified as a strategic centre in the Draft Plan for growing Hunter City and no reference is made to the existing role of Kotara as a sub-regional centre.

Direction 1.1 grow and diversify centres across the City (p.11) of the Draft Plan for Growing Hunter City states that Hunter City has nine strategic centres as follows:

- Broadmeadow
- Central Maitland
- Charlestown
- Glendale
- Green Hills-Metford
- John Hunter Hospital Campus (New Lambton Heights)
- Newcastle City Centre
- Raymond Terrace
- University of Newcastle Campus (Callaghan)

Kotara is not identified as a strategic centre and is only identified in the mapping accompanying the draft plans as a “centre” similar to Adamstown, Hamilton, New Lambton, The Junction, Waratah and Mayfield.

In regard to these centres the plan states that *“Smaller centres and traditional main streets will remain an important focus for local communities. Growth in these centres will respond to the changing needs of local communities.”*

A hierarchy of urban centres, headed by Newcastle as the pre-eminent centre in the Hunter Region, has always been a key component of both State and Local planning instruments and policies for the Lower Hunter region for over 35 years. Kotara’s role as a major sub-regional centre has always been acknowledged in these instruments.

Despite this fact the Draft Strategy currently on exhibition fails to identify Kotara as a major centre which is entirely inconsistent with planning policy and strategies that have existed for over 35 years. It is clearly inconsistent with the existing situation.

A brief overview of these studies, strategies and planning instruments are provided below:



1.1 Newcastle DCP No.1 1980

Council clearly recognised the status of Westfield Kotara (previously Garden City) as a sub-regional centre within the Newcastle DCP No.1 which was adopted by Council on the 16th September 1980.

DCP 1, entitled "*Business and Commercial Centres Land-Use and Development Policy*", emphasises the promotion of Newcastle as the major centre of the region and specifically refers to the prevention of uncontrolled dispersion of retail, business and commercial activities in zones other than the recognised business zones.

Clause 11 of the DCP states that:

"The planned structural organisation of business centres in the City of Newcastle recognises the following hierarchy:-

Regional Centre:
Newcastle C.B.D.

Sub-Regional Centre:
Garden City (Kotara)
Jesmond Centre (Waratah)

District Centre
Hamilton
Mayfield
K-Mart (Waratah)
Wallsend
The Junction
New Lambton

Neighbourhood Centre
Adamstown
Lambton
Beresfield....."

It is clear from the provisions of DCP 1 that for over 35 years, Westfield Kotara (previously Garden City) has been regarded as a major regional centre, second only to the CBD.

With respect to protecting the structural hierarchy of business centres the DCP states the following:

"2. *Recognising the primacy of Newcastle Central Business District as the Regional Centre, promote the consolidation and development of existing business centres within the City to achieve a balanced development of each, according to its role and appropriate level of function, justified by potential demand generated within the trade area "*



- "3 *Support the planned business centre hierarchy by encouraging the development of all Centres to an appropriate functional level and discouraging development of lower order centres to functional levels which are competitive with higher-order centres."*
- "16. *Support the consolidation of existing business centres by preventing the uncontrolled dispersion of retail, business and commercial activities into zones other than recognised business zones, for example by careful monitoring of retail developments in industrial zones, by controlling ribbon development, and by ensuring that rezoning proposals to allow retail and business development are not in conflict with these objectives and policies."*

Despite the fact that Garden City (now Westfield Kotara) was clearly performing a sub-regional role over 35 years ago, and continues to do so today, the provisions of the Draft Plan for Growing Hunter City fails to acknowledge the site as a strategic centre.

1.2 Lower Hunter Commercial Centres Study 1984

In December 1984, the Lower Hunter Commercial Centres Study prepared for the NSW Department of Environment and Planning stated that:

"The third centre in Newcastle, Garden City (Kotara), has a floorspace of some 25,000 sqm net lettable retail area and is the only urban area outside the CBD to have a full-line discount department store (David Jones). It expanded significantly between 1973 and 1979, the last two survey dates prior to the current study, doubling its floorspace and more than doubling its number of retail establishments."

The Study goes on to state that:

"After Newcastle CBD, Charlestown and Garden City, the scale and functional role of shopping centres, serving Newcastle declines markedly."

1.3 Newcastle Local Environmental Plan 1987

Up until 2003, Newcastle LEP 1987 was the primary environmental planning instrument applying to the Newcastle LGA. Clause 2 of the Newcastle LEP 1987 provided the following key objectives with respect to the hierarchy of Retailing and Commerce in the Newcastle LGA:

"(c) *Retailing and Commerce*

- (i) *to maintain and reinforce the role of the Central Business District as the Hunter Region's major commercial, administrative, cultural and entertainment centre;*
- (ii) *to maintain the role and reinforce the viability of the existing commercial centres in a manner appropriate to their functional role."*

This was the LEP in force at the time of the approval of the first major expansion proposals for the Garden City site in recent times. It was recognised by both the Land and Environment Court and Newcastle Council in issuing development consents under this LEP that Garden City serves



an important sub-regional function and draws its business from a wide area. The proposed extensions to Garden City were considered appropriate with respect to the functional role of the centre.

1.4 Hunter Regional Environmental Plan 1989

The Hunter Regional Environmental Plan was gazetted in 1989 and was in force for around 20 years. This REP took precedence over any other planning instrument in the lower Hunter region.

Both the Background Report prepared by the Department of Planning and the statutory instrument clearly identifies Kotara as a major sub-regional centre and a focal point for future employment in the Hunter Region in a locality that is consistent with the distribution of population.

The Background Report to the Hunter REP states that:

"Charestown, Garden City (Kotara), Maitland and the proposed Glendale centre are expected to develop further as important sub-regional commercial centres and provide the bases for increased employment in commercial, business and related services. Development of these centres will improve access to urban facilities and employment."

In over 25 years since this report was written there has been no diminishment of population growth or the role and function of Kotara to justify its exclusion from the Draft Strategy as a major urban centre. The role and function of the Kotara centre in the Hunter region has only been enhanced during this period.

Schedule 1 of the Hunter REP 1989 identified the existing and potential commercial functions of land in a hierarchical order within the Hunter Region. The Hunter REP identifies Westfield Kotara (previously Garden City) as a sub-regional centre, second only in importance and influence to the Newcastle CBD.

It is considered that the Draft Lower Hunter Strategy is clearly inconsistent with the provisions of the existing statutory environmental planning instrument applying to the region.

1.5 Newcastle Urban Strategy 1998

The Newcastle Urban Strategy was adopted by Council on 11th March 1998. The Urban Strategy aims to provide *"a framework for more sustainable urban form and structure"*. With respect to existing commercial centres the Background Report to the Urban Strategy states that:

"The regional commercial centres in Newcastle are the CBD and Kotara. There are indications of continuing suburbanisation of retail activities, with strong growth in suburban centres."

The Strategy states that one of the better outcomes for the environment of Kotara would be the increase in housing densities around Garden City to capitalise on available facilities. In recognising the potential for further redevelopment of disused industrial land the Strategy states



that there is "potential for mixed use including medium density and aged housing in Kotara on these sites."

1.6 Draft SEPP 66 – Integrating Land Use and Transport 2001

In 2001, Kotara was identified in State planning policies as a major centre in the Hunter Region. Draft SEPP 66 – Integrating Land Use and Transport was publicly exhibited between October to December 2001. This document formed part of a 'policy package' which represents the first attempt by the State Government to provide statutory control specifically related to the issue of integrating land use and transport.

Part of the draft SEPP 66 policy package includes *"the Right Place for Business and Services Planning Policy"*. This policy identified Sydney CBD (including North Sydney), Parramatta, Newcastle and Wollongong as the primary commercial and institutional hubs of the greater metropolitan region.

The policy went on to state that:

"Major urban centres with relatively high levels of accessibility and community investment in infrastructure and public services are listed below. They are the preferred locations for large-scale suburban office development (floorspace typically 5000 sqm – guide only) and higher order retail, entertainment, commercial and public facilities."

The major urban centres are identified as follows.

WITHIN SYDNEY		
* Bankstown	* Blacktown	* Bondi Junction
* Burwood	* Camden	* Campbelltown
* Castle Hill	* Chatswood	* Dee Why / Brookvale
* Fairfield / Cabramatta	* Hornsby	* Hurstville
* Liverpool	* Macquarie Park	* Mount Druitt
* Rouse Hill	* North Sydney	* Penrith
* Pyrmont	* Richmond	* St Leonards
* Sutherland / Miranda		
WITHIN NEWCASTLE		
* Charlestown	* Glendale	* Kotara
* Maitland		
WITHIN CENTRAL COAST		
* Gosford / Erina	* Wyong / Tuggerah	



WITHIN WOLLONGONG		
* Warrawong	* Dapto	* Shellharbour Square

Kotara was clearly identified in this State Government instrument as a major urban centre with characteristics that supported its ongoing important role in serving the Newcastle and Hunter Region.

No planning justification has been provided within the Draft Plan for Growing Hunter City as to the reasons for the failure to acknowledge Kotara as a strategic centre in the region. It is a major urban centre now and its size and function will ensure it remains so in the future. It is submitted that ignoring the facts is not a valid planning option.

1.7 Draft Lower Hunter Regional Strategy

In 2006, the Department of Planning released the Draft Lower Hunter Regional Strategy. This draft strategy was the first in over 25 years of planning policy that identified Kotara as something other than a sub-regional centre. The draft strategy referred to Kotara as a “Stand Alone Shopping Centre”. To suggest Kotara was a “*stand alone shopping centre*” was not a valid planning description of the sub-regional centre, simply ignored the facts on the ground in the Newcastle and Lower Hunter and was inconsistent with historical strategic planning in the region.

Submissions of objection on behalf of Westfield were lodged with the Department of Planning and representations made to the Minister of Planning.

Summary

Kotara is clearly a mixed use sub-regional centre catering for residential, commercial, industrial, educational and bulky goods and major retail land uses. The centre is well served by public transport and easily accessible to public open space areas. It is clearly evident that Kotara has played and will continue to play a major role in the metropolitan structure in Newcastle and the Hunter region.

Overall, it is clearly evident that Kotara has played and will continue to play a major centre role in Newcastle and the Hunter region. Kotara will continue to be a strategic centre and focal point for employment and economic activity within the Hunter Region.

It is considered that the Draft Plan for Growing Hunter City must be amended to be consistent with the planning policies and strategies over the last 35 years and be consistent with the existing role of Kotara. It must identify Kotara as a strategic centre in the Hunter region. There is no possible planning justification for not doing so.

2. Kotara is well located to serve as a future major centre

In regard to the vision put forward for the next 25 years states, Direction 1.1 of the Draft Plan for Growing Hunter City states that:



“Strategic Centres and global transport gateways will be the City’s main locations for jobs and specialist services. Concentrating jobs in these locations and enhancing connections between them will improve access to employment, shops, services and entertainment, and the City’s liveability and competitive edge.”

Kotara is one of the major employment centres of the Hunter region. Kotara is already a major strategic centre where employment, shops, services and entertainment is provided to Newcastle and the wider region.

Westfield Kotara is located on a high exposure site at the intersection of Park Avenue and Northcott Drive. Northcott Drive is a major road connecting vehicle traffic from the north-western suburbs of Newcastle to the Pacific Highway.

The site has good road accessibility and combined with the retail offer available at the centre, Kotara is relevant as an important sub-regional shopping destination for the surrounding region.

In terms of public transport, Kotara is well served by a local bus route and the Adamstown and Kotara train station which are located within 1 kilometre of the centre. The area between the railway line and the Westfield Kotara retail centre is totally zoned for employment activities.

The Westfield Kotara site has an FSR control of 2:1 which allows for additional expansion of the centre. The site has DA approval for bowling alley expansion and major fashion retailer developments. There is a strong and proven commitment by Scentre Group to continue to invest in the Hunter region and strategic plans should support this objective for growth in investment and jobs at the existing major sub-regional centre of Kotara.

The Kotara commercial centre is adjoined by industrial land to the north, land zoned for medium density residential development surrounds the centre and open space to the south.

It is considered that Kotara is an ideal location to encourage a future compact urban form allowing for people to live in a location with good accessibility and adjacent to a major employment centre with leisure and recreational facilities available in the form of the cinemas, restaurants and cafes existing and approved for Kotara and also the adjacent parkland areas.

3. The Draft Strategy will effectively result in a down zoning of the Kotara Centre

In regard to supporting the vision for the Hunter Region, the introduction to the Draft Strategy (p.6) states that:

“the hunter region will capitalise on its diversity and connectivity to capture growth, using its natural resources and amenity, economic strengths, and its communities, to actively manage change and attract investment. It will offer an array of quality lifestyles within sustainable and healthy environments.”

It is our opinion, and apparent from the public document, that the continuation of the Draft Strategy in its current form will effectively result in the down grading of the role and function of the existing Kotara centre and potential subsequent statutory constraints placed on the role and function of Kotara in the Lower Hunter region.



It is our opinion that this is in direct conflict with the intent of the S117. Ministerial Direction No.3 – Business Zones which has the objective:

“To ensure the economic and efficient development of existing business areas and centres, and related public services.”

The Direction also states that any new Draft LEP shall not *“(1)(c) create, remove or alter provisions applying to land zoned for Business that will result in a reduction of potential floor space area.”*

If new environmental planning instruments are required to be consistent with the new Regional Strategy then the sub-regional status of the Kotara centre is likely to be altered, with the site potentially being down zoned or restrictive commercial floor space provisions introduced.

The failure of the Draft Strategy to recognise Kotara as a strategic centre is likely to result in conflicts with other centres in the Hunter Region and a potential diversion of future investment away from public and private infrastructure and services within Kotara and the Newcastle LGA. This is a very serious matter.

It is considered that the provisions of the current Draft Strategy will stifle the economic and efficient development of the Kotara business centre which directly conflicts with the planning principles espoused in the Ministerial Direction No.3 for business land and conflicts with all historical planning documents over the last 25 years.

The identification of Kotara as a *“strategic centre”* needs to be clearly reinforced to ensure the same statutory legal weight in the future metropolitan structure and strategic planning of Newcastle and the Hunter Region.

CONCLUSION

For the reasons outlined above we strongly object to the Draft Plan for Growing Hunter City because it fails to identify Kotara as a strategic centre. To exclude Kotara as a strategic centre is unjustified and ill conceived.

In regard to the Kotara sub-regional centre, the Draft Plan for Growing Hunter City is inconsistent with the last 35 years of planning policy, conflicts with the existing role of the centre and will not provide the flexibility necessary for the strategic planning and development of this important centre in Lower Hunter region.

We request an amendment to the Draft Plan which identifies Kotara in a manner consistent with it's role and function as a strategic centre within Newcastle and the surrounding region.

We forward this letter as a formal submission to the Draft Plan for Growing Hunter City currently under consideration and trust that the Department of Planning and Infrastructure will fully review and consider the implications of this strategic plan upon the role and function of Kotara as well as the impact upon future ongoing investment and renewal of this major sub-regional centre in the Hunter region gateway on the Central Coast.



We respectfully request a response in writing and opportunity to meet with the Department of Planning and Infrastructure to discuss this significant matter.

Yours faithfully

INGHAM PLANNING PTY LTD



APPENDIX A

MAP EXTRACTS FROM
DRAFT PLAN FOR GROWING HUNTER CITY
(NOVEMBER 2015)



Planning &
Environment

DRAFT PLAN FOR GROWING

Hunter City

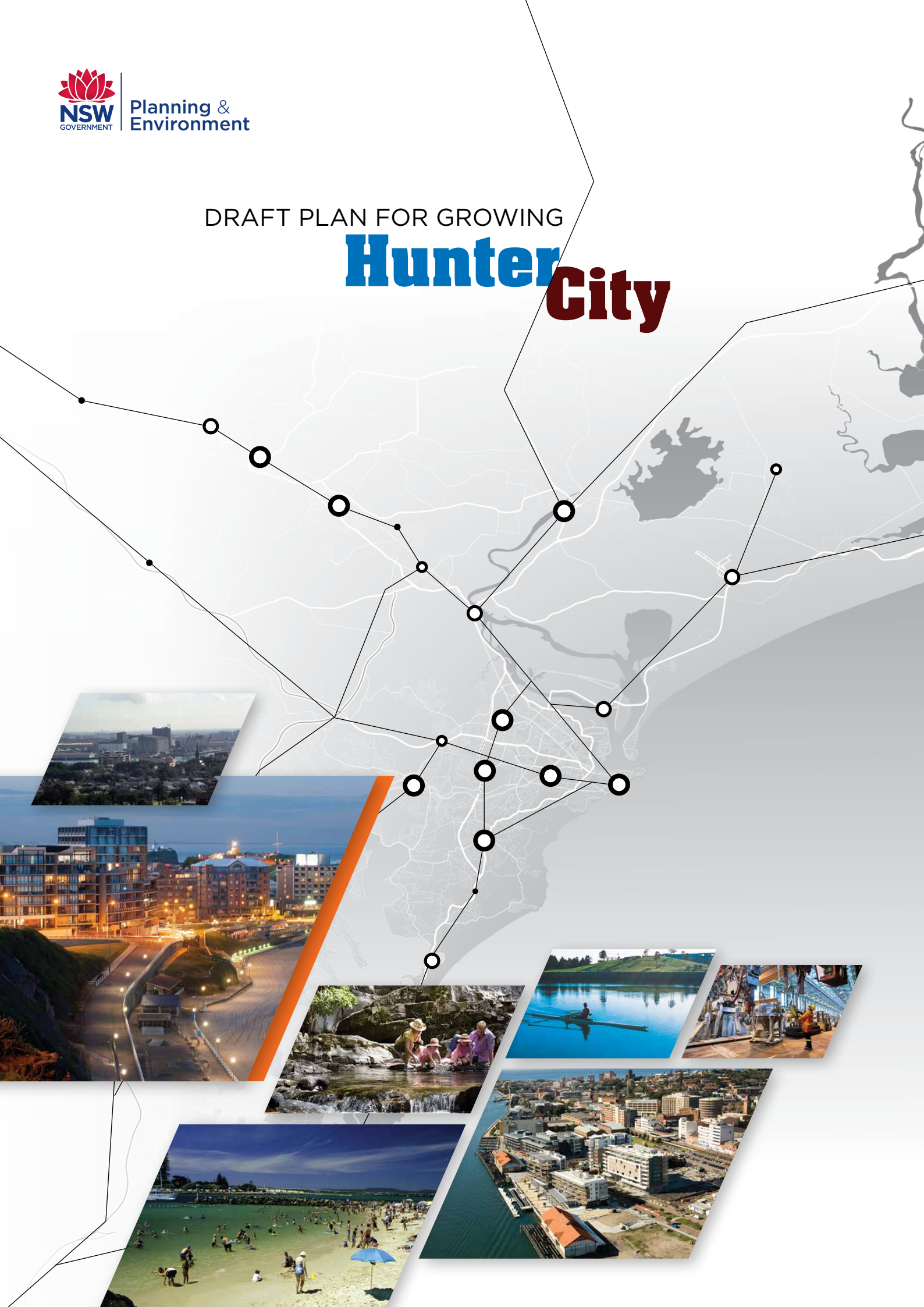


FIGURE 3: INNER NEWCASTLE DISTRICT

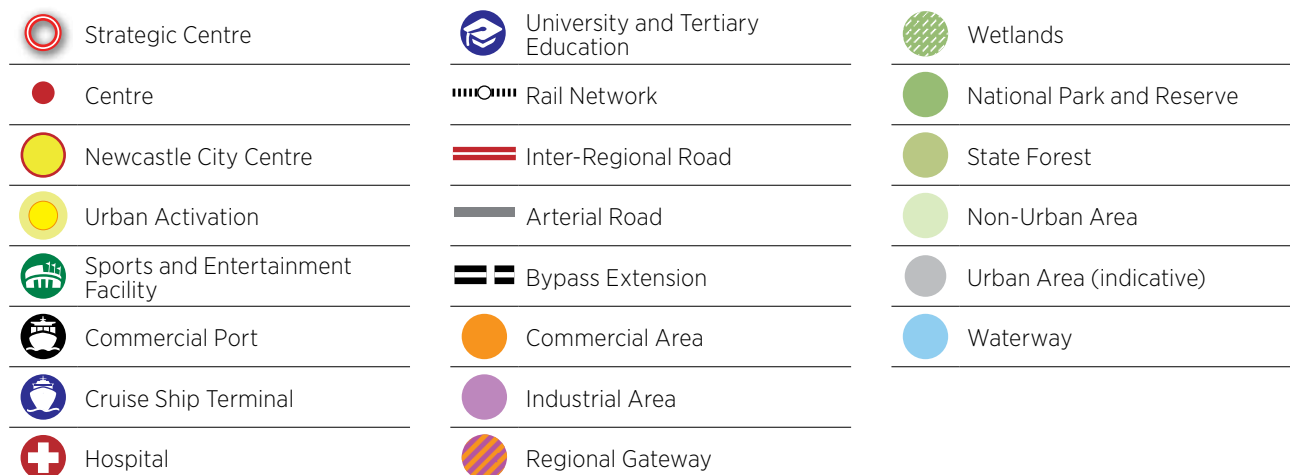
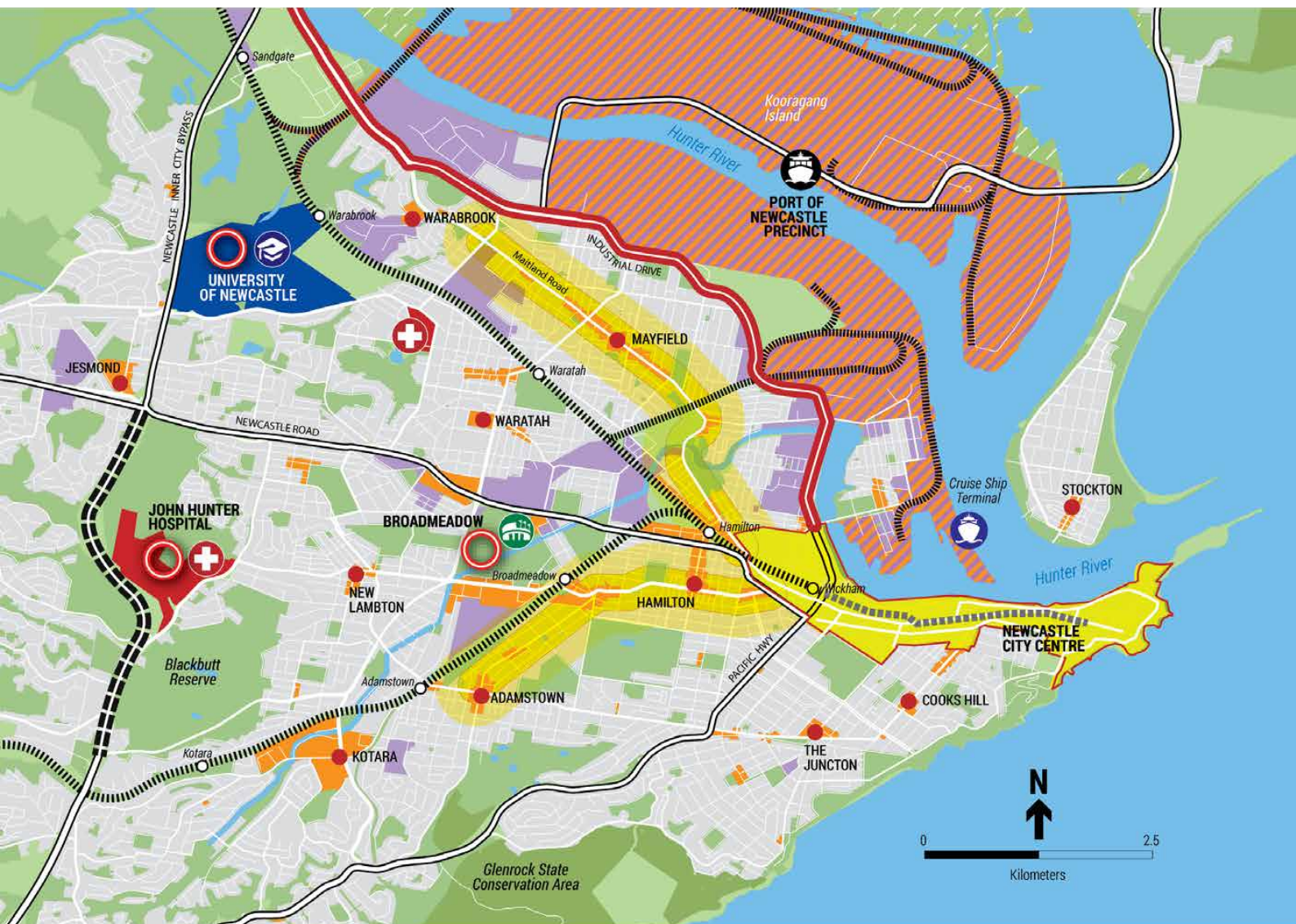
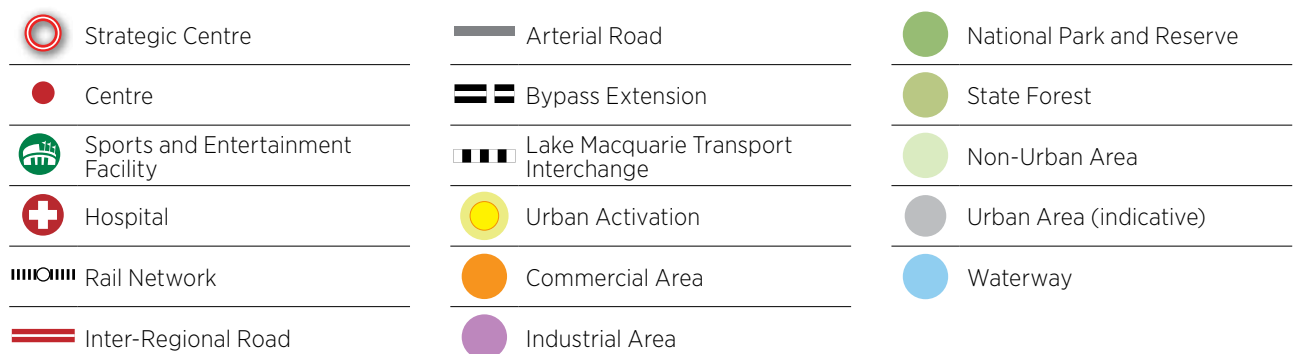
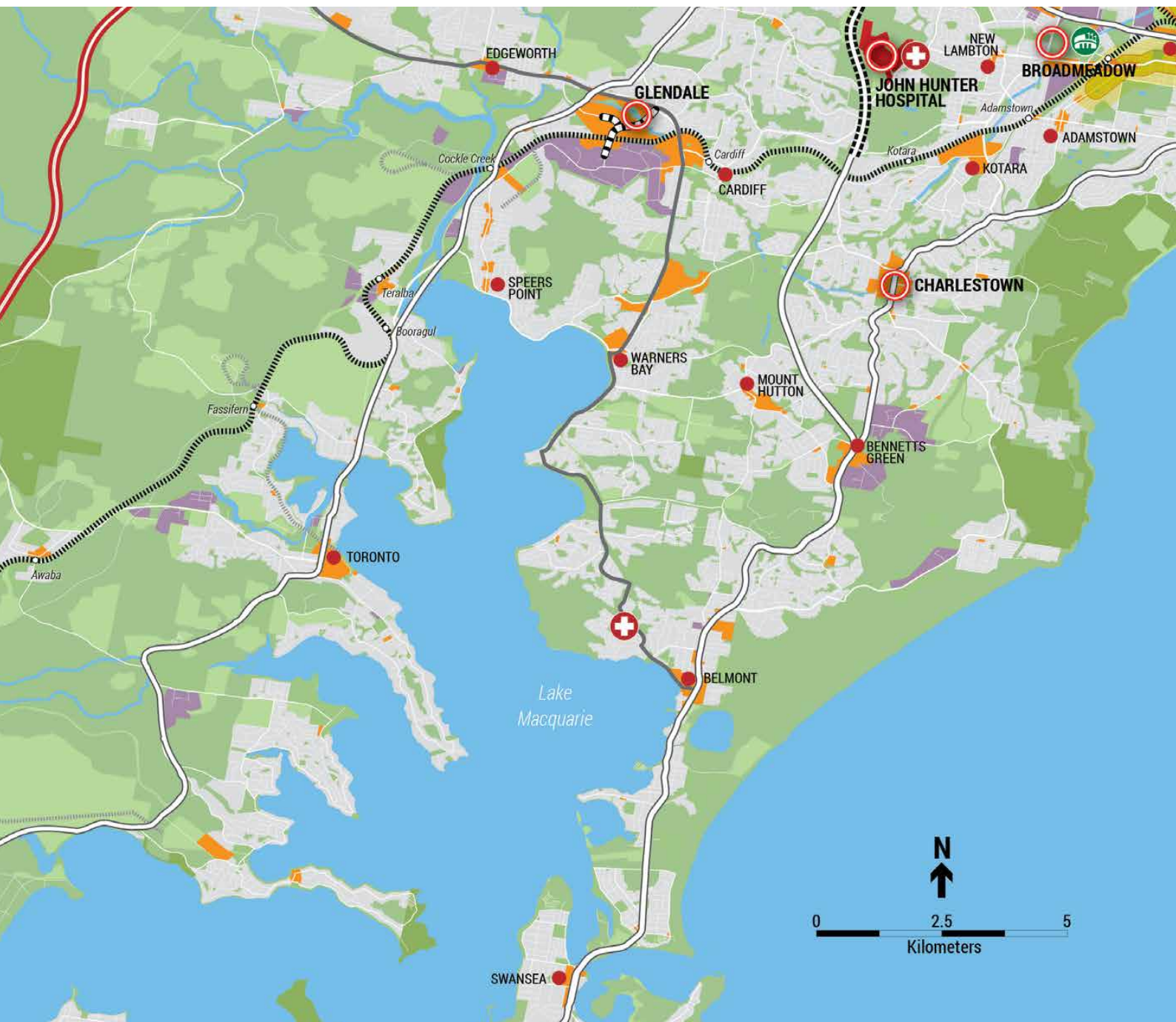


FIGURE 4: NORTHERN LAKE MACQUARIE DISTRICT





APPENDIX B

OVERVIEW OF WESTFIELD KOTARA BY SCENTRE GROUP

SCENTRE GROUP

26 February 2016

David Winley
Ingham Planning
Suite 19, 303 Pacific Highway
Lindfield NSW 2070

Dear David

DRAFT HUNTER REGIONAL PLAN AND DRAFT PLAN FOR GROWING HUNTER CITY

This summary has been prepared to support Ingham Planning's submission on behalf of Scentre Group to the Draft Hunter Regional Plan and Draft Plan for Growing Hunter City.

According to the Property Council of Australia¹ (PCA), a major shopping centre typically incorporates at least one full line department store, one or more full line discount department stores, one or more supermarkets and approximately 150 specialty shops along with a number of entertainment and leisure attractions such as cinemas. The introduction of an entertainment usage (Event Cinema) within Westfield Kotara further supports the centre's inclusion as a major regional shopping centre.

Westfield Kotara and Charlestown Square each have a full line department store, two supermarkets, two discount department stores and a large number of speciality stores (Westfield Kotara 240 and Charlestown Square 236)² and an entertainment/cinema precinct.

When reviewing the PCA's established definition for shopping centres, it is clear that Stockland Glendale reflects the characteristics of a regional centre as it does not have a full line department store and limited number of specialty stores (70 as at December 2014²). In reviewing the hierarchy of centres within the Newcastle area, Westfield Kotara and Charlestown Square are therefore of greater standing relative to Stockland Glendale.

When focusing on Westfield Kotara and Charlestown Square, Charlestown Square has a larger retail footprint, however on a total MAT to GLA basis (sales productivity), Westfield Kotara is more productive with \$445.8m sales of \$7,173/sqm².

Although Charlestown Square has greater foot traffic, spend per visit is substantially less than Westfield Kotara.

¹ The Property Council of Australia is the national peak industry body representing property developers, property investors and businesses that provide professional services to the property industry in Australia (Source: South Australia 2015-16 Pre-Budget Submission, prepared by Property Council of Australia).

² 'Big Guns' - Shopping Centre News, Volume 33, Number 1, 2015

Table 1: Westfield Kotara and Charlestown Square Key Metrics

Centre	Westfield Kotara	Charlestown Square
GLA	68,660	90,200
Asset Value	\$710m (Dec 14)	Not disclosed
MAT	\$445.8m	\$522.0m
Traffic / year:	7.7 m	14.1 m
Av spend / visit:	\$58.00	\$37.00
MAT / sqm	\$7,173	\$7,053
Specialty MAT / sqm	\$9,601	\$9,717
Majors	David Jones, Coles, Woolworths, Kmart, Target , Toys R Us	Myer, Coles, Woolworths, Big W, Target
Mini-Major	10	13
Specialities	240 (+ 9 restaurants November 2015)	236
Cinema	Events (December 2015)	Reading
Cars	2,973	3,450

Source: Shopping Centre News 'Big Guns' 2015 as at Dec 2014.

In late 2015, Westfield Kotara launched a Hunter Valley-inspired \$55m outdoor dining and entertainment precinct, "The Rooftop", featuring nine new restaurants, a performance stage, play area, and a new Event Cinemas complex at Westfield Kotara, which is a premium offer cinema with two gold class theatres, the largest V-Max screen in NSW and five general auditoriums.

When reviewing retail expenditure of the suburbs within Kotara's Total Trade Area, Westfield Kotara achieves 11.3% of market share compared to Charlestown (8.7%), Glendale (4.8%) and Newcastle (4.3%)³. 69% of Newcastle residents live in the Kotara Total Trade Area⁴.

Roy Morgan's data further highlights Westfield Kotara as the most visited retail location in the Hunter region. When asked which of the shopping centres (see table below) have you bought anything in the last 4 weeks within the Total Hunter (including Newcastle), 30% had shopped at Westfield Kotara compared to Charlestown Square (24%), Maitland City Centre (10%) and Stockland Glendale (18%)⁴.

³ Quantum Data Analytics, 2014

⁴ Roy Morgan Single Source Australia: October 2013 – September 2015

Since Westfield Kotara's re-launch in late 2015, traffic (customer footfall) within the centre has significantly increased. Given the increasing traffic numbers since the centre's re-launch, we consider that Westfield Kotara's importance will continue to grow.

Table 2: Roy Morgan Shopping Behaviour

ROY MORGAN SINGLE SOURCE AUSTRALIA: OCTOBER 2013 - SEPTEMBER 2015		
	REGIONS - NSW incl. ACT (REVISED APR14)	
From which of the Shopping Centres listed below, have you bought anything, in the last 4 weeks?	NSW Country - Newcastle	NSW Country - TOTAL Hunter (incl. Newcastle)
NSW COUNTRY SHOPPING CENTRE BOUGHT GOODS FROM IN THE LAST 4 WEEKS		
Westfield Kotara	34%	30%
Maitland City Centre	12%	10%
Charlestown Square	27%	24%
Jesmond (Stockland)	16%	13%
Glendale (Stockland) - Newcastle	21%	18%
Wallsend (Stockland) - Newcastle	8%	7%
Forster (Stockland)	0%	4%
Westfield Tuggerah	3%	3%
Bay Village (Stockland) - Bateau Bay	1%	0%
Erina Fair	0%	0%
Lake Haven Shopping Centre	3%	3%
TOTAL Bought from New South Wales Country Shopping Centre	72%	71%
Roy Morgan Research Ltd., Melbourne, Australia		

When determining the strategic locations, NSW Planning cannot disagree that Westfield Kotara and Kotara Homemaker Centre form a primary retail destination within the Hunter region.

According to the PCA's Shopping Centre Directory (online)⁵, there is 58,310sqm of GLA at Kotara Homemaker of which 46,553sqm are Major Bulky Good Usages such as Bunnings (12,863sqm), Domayne (6,524sqm), Freedom Furniture (3,066sqm), Trade Secret (2,700sqm), Nick Scali Furniture (1,816sqm), Pillow Talk (1,901sqm), Bay Leather Republic (1m,789sqm) and there are also 25 speciality stores. The quality of these retailers are such that they have a key site within the region and their decision to choose Kotara shows the importance that they place on the location.

⁵ Shopping Centres Online, Property Council of Australia

Therefore, Kotara should be considered a suburb of strategic importance and should not be overlooked in the Hunter City growth plan.

We note that the particulars of information contained in this letter have been sourced from third parties and / or is publicly available. While the third party information is believed by Scentre Group to be correct as at the date of this letter, we make no representation as to the accuracy of such third party information.

Sign: 

Name: Nicky Watson
Position: Development Executive
Date: 26 February 2016