

AMENDMENT C393 GREATER GEELONG RETAIL STRATEGY - CONSIDERATION OF SUBMISSIONS

To: Peter Smith – Coordinator Strategic Implementation
From: Peter Schembri – Senior Strategic Planner
Subject: Resolution to consider submissions to an amendment under delegation
File number: C393

Purpose

This report considers submissions to Amendment C393 and recommends that Council resolves (under delegation) to refer the submissions to an Independent Panel.

Summary

- The *Greater Geelong Retail Strategy 2016-2036 (Strategy)* replaces the 2006 Retail Strategy. The Strategy addresses changes to the retail network, retail floor space demand and policy context. The Strategy was prepared in partnership with SGS Economics and Planning.
- The Council resolved to adopt the Strategy at its meeting of 27 November 2018. It was also resolved to exhibit a planning scheme amendment (C393) to implement the necessary elements of the Strategy into the Greater Geelong Planning Scheme.
- Exhibition of Amendment C393 commenced on 10 April and closed on 20 May 2019. Notice of the amendment appeared in local newspapers, the Geelong Australia website and letters were sent to commercial land developers and retail operators.
- 14 submissions were received from a broad range of retail and land developer groups with financial interests in the Geelong region. Many of the submissions supported some parts of the Amendment but not other parts of the Amendment.
- Key issues raised in submissions relate to the application of floor space caps for 'Shop' in sub-regional and planned activity centres, deficiencies in the economic modelling, the location of centres and drafting of the new policies.
- In accordance with the *Planning and Environment Act* Council must now either: change the Amendment in the manner requested by the submitters; refer the submissions to an Independent Panel; or abandon the Amendment.
- Council officers have considered the submissions and sought to resolve objections where possible. We propose to make a number of changes to the Strategy to correct errors, inconsistencies and policy content.
- Officers recommend drafting changes to proposed clauses 21.19 and 22.03. Removal of floor space caps from growth location centres is not supported however some floor space amounts have been adjusted in-line with submissions. All Amendment document changes are shown in Appendix 1.
- It is recommended that all submissions be referred to an Independent Panel appointed by the Minister for Planning.

Recommendation

That Council having considered all submissions to Amendment C393 to the Greater Geelong Planning Scheme resolves to:

- 1) **Request the Minister for Planning to appoint an Independent Panel under Part 8 of the Planning and Environment Act, 1987;**
- 2) **Refer all submissions to the Panel; and**
- 3) **Submit to the Panel its response to the submissions generally as outlined in this report.**

**Approved as a resolution of Council by Council's delegate: P. Smith
Date: 22 August 2019**

Background

The *Greater Geelong Retail Strategy 2016-2036 (Strategy)* replaces the 2006 Retail Strategy. The Strategy addresses changes to the retail network, retail floor space demand and policy context. The Strategy was prepared in partnership with SGS Economics and Planning.

A draft of the Strategy was made available for informal public comment from 27 March to 28 April 2017. Council received twelve submissions to the draft Strategy.

Carried at the 27 November 2018 Ordinary Meeting was that Council:

- 1) Adopt the City of Greater Geelong Retail Strategy 2016-2036:
- 2) Resolve to prepare and exhibit a planning scheme amendment to include the necessary elements of the City of Greater Geelong Retail Strategy 2016-2036 within the Greater Geelong Planning Scheme, subject to authorisation by the Minister for Planning.

The full Council Report to adopt the Strategy can be found at:

<https://www.geelongaustralia.com.au/common/Public/Documents/8d656afe0b36a0f-councilminutes-27november2018.pdf>

After requesting authorisation to prepare and exhibit the Amendment, the Minister's delegate provided conditional authorisation including:

Condition 2: *Amend the references to the future retail centres in the Northern and Western Geelong Growth Areas in the map at Clause 21.19-5.*

These centres do not yet form part of the Geelong Retail Centre Hierarchy. The economic analysis in support of these centres has not been tested and they cannot be considered as equal in status to the Armstrong Creek sub-regional centre/neighbourhood centres which were approved via separate planning scheme amendments.

Condition 4: *The changes proposed to the MSS/LPP must be drafted to take into consideration the Local Planning Policy Framework (LPPF) translation which will be undertaken as part of the Smart Planning program.*

Prior to exhibition the map at Clause 21.19-5 was amended to designate the Northern and Western Geelong Growth Area centres as 'indicative'. The provisions are able to be translated into the new Municipal Planning Strategy and Planning Policy Framework. The LPPF translation is in process at the time of writing this report.

Amendment C393 was exhibited between 10 April and 20 May 2019. Late submissions were accepted.

The Amendment proposes the following changes to the Planning Scheme:

- Delete the retail policy provisions at Clause 21.07 *Economic Development and Employment*.
- Insert a new Clause 21.19 *Activity Centres* that includes an updated Geelong Retail Centre Hierarchy and identifies the Retail Strategy as a background document.
- Replace Clause 22.03 *Assessment Criteria for Retail Planning Applications* with a new Clause 22.03 *Assessment Criteria for Retail Planning Applications*.
- Amend the Schedule to Clause 34.01 Commercial 1 Zone.
- Amend the Schedule to Clause 72.08 Background Documents.

Letters were sent to commercial zoned landowners and major retailers in the region. Notices were placed in the Geelong Independent and Geelong Advertiser newspapers. The documentation was available on the Geelong Australia website and at Council's Brougham Street Geelong offices. Submitters to the draft Strategy were also notified.

Discussion

Exhibition of Amendment C393 resulted in 14 submissions from the following persons/organisations:

1. ALDI Stores.
2. Algo Properties, owners of land in the Jetty Road Neighbourhood Activity Centre.
3. APD Projects, part owners and development managers of the Warralily Neighbourhood Activity Centre.
4. Geelong Warehouse Traders, 370 Thompson Road, North Geelong.
5. Merost Pty Ltd, owner of Bell Park Plaza.
6. Kaufland Australia.
7. Lascorp Development Group, with interests in the Leopold Sub-Regional Activity Centre and the Kingston Downs Neighbourhood Activity Centre, Ocean Grove.
8. Lovely Banks Development Group.
9. Morgan & Griffin, owners and developers of Oakdene Estate, Ocean Grove.
10. Ramsey Property Group, part of the land consortium for the Western Geelong Growth Area.
11. Shell Road Developments, landowner and developer of the Kingston Downs Estate, Ocean Grove.
12. Westfield Geelong.
13. Landowners of 92 Melaluka Rd Leopold, which is the land designated as Stage 2 of the Leopold Sub-Regional Activity Centre.
14. McCann Family, landowner within the Western Geelong Growth Area

Key issues raised in the submissions relate to the application of floor space caps for 'Shop' in sub-regional and planned neighbourhood activity centres, deficiencies in the economic modelling, the location of centres and drafting of the new policy provisions.

While this report agrees with some aspects of the submissions and proposes to change the Amendment, there are submissions which are not supported. There are some submissions which do not request any changes or have been withdrawn. It is recommended that all the submissions be referred to an Independent Panel in accordance with section 23 (1) and (2) of the *Act*.

The exhibited dates set for a panel hearing are not workable and with the approval of the Department of Environment, Land, Water and Planning and Planning Panels Victoria, the panel hearing will now be held in the week commencing 28 October 2019.

Appendix 1 shows the drafting changes to the exhibited planning provisions in response to submissions. This includes correcting the location of indicative centres designated on the Location of Retail Centres map at Clause 21.19-5. The Appendix 1 provisions represent the position Council will submit to the Panel.

Appendix 2 summarises each submission and provides a brief officer response.

The next section of this report summarises the key themes raised in submissions and provides a Council officer response to the submissions.

'Shop' floor space caps

A number of submissions requested that designation of a floorspace cap to a particular centre be removed or that the cap area (sqm) be changed. The centres are:

- Kingston Downs NAC (referred to as 'Kingston Downs Neighbourhood Activity Centre, Grubb Road, Ocean Grove' in the exhibited Schedule to Clause 34.01 C1Z).
- Warralily Village (referred to as 'Armstrong Creek East Precinct Neighbourhood Activity Centre' in the exhibited Schedule to Clause 34.01 C1Z).
- Leopold Sub-Regional Activity Centre (referred to as 'Bellarine Gateway Plaza, 621-639 and 641-659 Bellarine Highway, Leopold') in the exhibited Schedule to Clause 34.01 C1Z).

Morgan & Griffin (Submission no. 9) are the owners and developers of Oakdene Estate, Ocean Grove and 231-299 Grubb Road, Wallington. The submission requests removal of the retail floor space cap on the Kingston Downs NAC saying it is premature and prejudicial to proper strategic planning processes. Suggests the key justification for removing the cap is that the necessary growth investigation areas and ultimate long-term boundary for Ocean Grove has not yet been determined.

Shell Road Developments (Submission no. 11) is the landowner and developer of the Kingston Downs Estate, Ocean Grove, which includes the neighbourhood activity centre. The submission requests removal of the retail floor space cap from the Kingston Downs NAC. Reasons include: that the centre has been planned and tested through amendment processes and now reflected in the zonings, development plans and permits; significant investment is based on these approvals; nearby estates have developed with knowledge of the centre's expected scale and composition; the centre will serve greenfield population growth; and other nearby centres will not be disadvantaged.

The Oakdene Estate and the Kingston Downs Estate form what is generally known as the Ocean Grove North-East Growth Area.

Lascorp Development Group (Submission no. 7) is the developer of the Kingston Downs NAC. The submission notes that the Retail Strategy and C1Z Schedule propose a 'Shop' floor space cap of 7,650sqm. The submission says that given the area is experiencing significant population growth, it is premature to include a 'Shop' floor space cap and requests that it be removed.

Lascorp also has interests in the Leopold Sub-Regional Activity Centre. Lascorp requests that the maximum leasable floor area for a shop in the centre be changed to 30,000sqm (instead of 23,000sqm as designated in the exhibited Schedule to the C1Z).

ALDI (Submission no. 1) has a valid permit to construct a store in the Warralily NAC. The submission highlights that the exhibited 'Shop' floor space cap of 6,000sqm is less than the approved shop floor space for the Warralily NAC. Suggests the existing and

approved 'Shop' floor space is in the range of 7,500-8,000sqm. The submission requests that the cap be reviewed to accurately reflect occupied and vacant 'Shop' floor space and the proposed ALDI development of 1,902sqm.

APD Projects (Submission no. 3) are the development managers and form part of the ownership group for the Warralily NAC. Like the ALDI submission, APD request review of the cap. The submission says the Retail Strategy recommendation to maintain the maximum 'Shop' limit at 6,000sqm in the Planning Scheme is not acceptable knowing it is well short of the current and permitted space. APD also requests consideration for a further 3,700 sqm of Centre floor space growth within the next 1-3 years.

Ramsey Property Group (Submission no. 10) does not support the notion of the use of floorspace caps saying it works against market forces. The submission does however agree the Retail Strategy should support a hierarchy of centres across Greater Geelong.

Westfield Geelong supports floorspace caps. Westfield submits that should the changes to the C1Z Schedule be adopted, that further policy emphasis is placed on the 'Supportable Retail Floor Space Guidelines to 2036' (Clause 21.19 Table 1) to ensure expansion of existing centres does not exceed the anticipated floor space demand.

Officer response

The Greater Geelong Planning Scheme currently contains a Schedule to the Commercial 1 Zone (C1Z) that designates maximum leasable floor area (in square metres) for Shop, other than Restricted retail premises, to a number of retail centres in the municipality.

The Amendment proposes to remove floorspace caps from smaller and established neighbourhood centres, but apply caps to sub-regional centres and neighbourhood activity centres in growth area locations.

In the 'Operation' section of the C1Z, it states: '*A schedule may apply under this zone to a planning scheme outside of metropolitan Melbourne*'.

This policy setting was considered as part of the State Government's 2013 Reformed Zones Advisory Committee Report (Commercial and Industrial). The report included discussion of floorspace caps and supported the ability to apply caps in regional Victoria saying (page 33): '*... the ability to retain floorspace caps could help to prevent leakage from centres and support the establishment of a robust retail hierarchy in developing growth areas and non-metropolitan locations and make best use of often scarce existing infrastructure*'.

What is clear is that the Victoria Planning Provisions provide the capacity for regional planning authorities to apply floorspace caps in their Planning Scheme. This statutory provision allows councils to consider the merits of 'Shop' uses over and above the cap.

The Retail Strategy applies floor space caps to sub-regional activity centres and neighbourhood centres in growth area locations.

In considering the submissions, officers do not support the removal of floor space caps from any of the centres listed in the exhibited Schedule to the Commercial 1 Zone. The use of the Schedule supports the City's fundamental policy position to consolidate and strengthen the established Geelong Retail Centre Hierarchy. The cap is not an absolute but triggers the requirement for a 'use' planning permit.

The permit trigger provides Council with the opportunity to review the overall size, timing and economic impact of the proposed development on existing centres and the established retail hierarchy. This approach is consistent with the Planning Policy Framework, which at Clause 11.03-1S *Activity centres*, includes strategies to support the role and function of individual centres and give clear direction on preferred locations for investment.

What has been reviewed is the floor area amounts. After considering the submissions and reviewing valid planning permits, it is proposed to change floorspace amounts in the following centres:

- Warralily Village NAC: exhibited 6,000sqm, changed to 7,700sqm as requested by ALDI and APD Projects. Note, the 7,700sqm amount does not include 'Hospitality' of 1,060sqm (Food and drink premises) which was included in the exhibited Shop amount in error, but does include the vacant 900sqm.
- Leopold Sub-Regional Activity Centre: exhibited 23,000sqm, changed to 30,000sqm as requested by Lascorp

A revised Schedule to the Commercial 1 Zone is shown in **Appendix 2**. Corresponding changes will also be made to the Retail Strategy.

It is not clear whether the APD submission is requesting a further 3,700sqm be added to the Warralily Village NAC floorspace cap. A further increase of the cap is not supported however the Strategy projects floorspace demand for all retail uses to increase to 11,100sqm by 2026. This projection would support APD plans to develop the vacant lots on the northern side of Central Boulevard. We note that the Armstrong Creek East PSP and approved Urban Design Framework supports a mix of activity centre uses.

With regard to the Kingston Downs NAC, the Strategy's projected retail floorspace demand out to 2036 is 6,300sqm (Table 5). The Centre is under construction and has permits for 10,935sqm of retail floorspace, which includes 6,877sqm (Council officer calculation) for Shop.

Based on the endorsed plans (PP-233-2016 approved 16/05/2019), we have calculated the 6,877sqm assuming 50% of the specialty retail outlets will not be 'Shop' (e.g. Food and drink premises). ERM on behalf of Lascorp by email dated 12/08/2019 advised that two of the specialty outlets would be used for Food and drink premises (approximately 100sqm). Under this scenario just 3% of the available specialty retail floor space is expected to be non-Shop uses which is unrealistic. We have assumed 50% however propose to retain the exhibited 7,650sqm which conservatively sits in-between Council's and Lascorp's position.

The Shop amount of 7,650sqm does not include the 1,830sqm ALDI Store and specialty outlets on C2Z land but the C2Z land does form part of the Kingston Downs NAC.

The Centre could potentially support over 20,000sqm of floorspace (all retail) and therefore strongly compete with the higher order Leopold Sub-Regional Activity Centre and Ocean Grove Town Centre. The Centre also joins the Sinclair Street restricted retail precinct which further adds to the overall mass of available and potential retail floorspace.

Strategies for Ocean Grove at Clause 21.14 seek to ensure the Town Centre remains the primary retail centre while supporting a new neighbourhood activity centre in the north-east growth area adjacent to Grubb Road. Further analysis is provided in the Ocean Grove Structure Plan 2015 (amended September 2016) which highlights the extent of the C1Z land and finds that the role and size of the Grubb Road Activity Centre should be reassessed as part of the overall Retail Strategy review.

We do not agree to remove the Kingston Downs NAC from the Schedule to the C1Z nor change the exhibited maximum leasable floor area for Shop of 7,650sqm.

Should future investigations of the Ocean Grove settlement boundary ultimately result in urban expansion, applications to increase 'Shop' uses above the proposed cap can be lodged and considered on their merits. Likewise, given that more than half of the Centre's C1Z land remains vacant (being 5.7 hectares out of a total of 9.7 hectares), buildings & works applications may well be lodged now.

Any significant expansion west of Grubb Road would need to consider the provision of a new retail centre to serve local convenience needs.

We note the support for floorspace caps from Westfield Geelong. However we do not agree with the assumption that there should be added policy emphasis to ensure expansion of existing centres does not exceed the Strategy's *Supportable Retail Floor Space Guidelines*. As explained on page 77 of the Strategy, the guidelines are not intended to prevent centres from growing larger than the floor space indicated in the table.

The retail economic model

Algo Properties (Submission no. 2) own land in the Jetty Road Neighbourhood Activity Centre, part of the newly developing residential estates at Curlewis (Drysdale/Clifton Springs Township). Algo challenges some of the fundamental assumptions in the Retail Strategy and the finding that there is a negative increase in supportable floorspace at the Jetty Road NAC over the next 20 years.

The submission believes the error in these assumptions can be found on pages 56 and 58 of the Strategy and that the data that populates Curlewis-Jetty Roads demand circle is missing. The submission requests these errors be rectified.

Lovely Banks Development Group (Submission no. 8) requests that the Retail Strategy remove confusing information in Table 15C and any like tables which could be misconstrued as providing recommended floorspace allocations in the new growth areas. The submission says any provisions of floorspace should be generated from future precinct structure plans when that detailed work is complete.

The submission also requests inclusion of a detailed explanation of the methodology and purpose of the gravity model, as well as reference to the date of the SGS Report that forms the basis of the Strategy.

In relation to the timeframe for delivery of the first Central North Local Centre in the Western Geelong Growth Area, Ramsey Property Group says development of the Creamery Road precinct will have commenced by 2022 therefore a 2026 delivery target is supported (not 2036).

The McCann Family (Submission no. 14) notes that the Retail Strategy population growth rate per annum is lower than the rate used for the Settlement Strategy and the Northern and Western Geelong Growth Areas Framework Plan. The submission requests reconsideration of the content and recommendations of the Strategy based on this fact.

Officer response

The Retail Strategy uses a 'gravity model' to estimate future retail needs of Greater Geelong by 2036. The model attributes floor space growth (in square metres) to all centres in the retail hierarchy, taking a whole-of-network approach and uses calculations to model human behaviour.

We agree with Algo that the majority of population growth in Drysdale will be in the Jetty Road Growth Area and there is capacity for the Jetty Road Neighbourhood Activity Centre to capture additional floorspace demand. The Centre will not undermine the higher order role of the Drysdale Town Centre.

There is an error in the supportable floorspace table (Table 5 of the Strategy) for Jetty Road. The projected floorspace demand for 2036 should be 5,600sqm (not 3,300). The red dot for Restricted Retail is also missing from the Retail Strategy map for 2036 (page 56). This translates to a Jetty Road Neighbourhood Activity Centre 2036 supportable floorspace of 1,400sqm (not negative 900). The errors will be rectified.

The inconsistencies identified by Lovely Banks Development Group are valid. We propose to update the Retail Strategy to consistently discuss these new growth areas at a high level. We will also add an appendix to the Strategy that summarises the retail gravity methodology and supporting data to better explain the model results.

Regarding the concerns of Ramsey Property Group about delivery timeframes, we will add words to describe how the Retail Strategy Table 5 *Supportable Floor Space 2016-2036* should be interpreted and applied. The intention is not that a centre cannot be delivered until 2036 but that by 2036 the model assumes there will be a retail centre in this location. The timing for delivery of the first Creamery Rd Precinct centre will be determined through the precinct structure planning process – and ultimately the market. The same principle applies to Lovely Banks Development Group's concerns about floorspace provision.

The McCann Family submission has correctly identified that the Retail Strategy forecasts a 2.0% population growth rate while the Settlement Strategy and the Northern and Western Geelong Growth Areas Framework Plan forecast 2.5%.

We do not propose to revisit the forecast rate or make changes to the Retail Strategy based on a higher rate. The policy is flexible to the extent that if population growth rates exceed 2.0%, applications where a 'use' permit is triggered can be considered on their merits. Growth rates are likely to fluctuate over the life of the Strategy and 2.0% is considered an appropriate average rate to ensure retail floor space is not oversupplied.

The 2018 Settlement Strategy outlines five growth scenarios; with Scenario C being 2.0% ('strong growth') and Scenario D being 2.5% ('aspirational growth'). The Settlement Strategy notes that the current 5-year growth rate is 2.0% however 2.5% has been used for calculating housing demand and supply. This allows for urban land supply and infrastructure buffers should growth rates surge, which is different to retail planning dynamics.

Furthermore, the recently released *Victoria in Future* population projections (July 2019), forecast a 2.0% per annum growth rate for the 2018-2036 period in the Geelong Local Government Area.

The location of future centres

Lascorp Development Group has interests in the Leopold Sub-Regional Activity Centre. Lascorp own a 6.1 hectare vacant farming zoned property at 601 Bellarine Highway. This property abuts the established Leopold centre to the west and has direct exposure to the Bellarine Highway.

The submission considers that the policy settings of directing future restricted retail north along Melaluka Road is undesirable and undermines the performance and viability of the centre. Considers the 'western' site to be a superior site for expansion of the centre and requests that further strategic work is required to explore this opportunity, particularly as the land to the north is not zoned for retail uses.

The submission recommends changes to the Retail Strategy at pages 70 and 88 to recognise the need for further strategic work.

The owners of the land north of the Leopold Sub-Regional Activity Centre at 92-100 Melaluka Road Leopold, lodged a submission confirming support for the Retail Strategy continuing to direct expansion of the Centre northwards.

The exhibited Amendment at Clause 21.19 proposes a new Geelong Retail Centre Hierarchy map. The map shows the location of established retail centres however also includes the indicative location of retail centres proposed in the Northern and Western Geelong Growth Areas Framework Plan – March 2019.

Ramsey Property Group, part of the land consortium for the Western Geelong Growth Area, does not agree with the location of the Central North Local Centre. The submission says that given the sequencing of the Creamery Road PSP, this indicative NAC should be moved into the Creamery Road precinct.

The McCann Family is a landowner within the Western Geelong Growth Area and is concerned that the location of centres at Clause 21.19-5 do not correlate with the locations in the Northern and Western Geelong Growth Areas Framework Plan. Nor is the Specialised Activity Centre identified.

Likewise, Lovely Banks Development Group requests inclusion of the correct centre locations in the Retail Strategy, noting the centre locations in Figure 6 are incorrect.

Officer response

The Lascorp recommendation for the Retail Strategy to include commentary for further strategic work on the future expansion of the Leopold Sub-Regional Activity Centre is not supported.

The direction for future expansion of the Centre is well established in the Greater Geelong Planning Scheme. Expansion is limited to the east side of Clifton Avenue being the edge of the Leopold Settlement Boundary designated in Clause 21.14 and the Leopold Structure Plan 2011 (amended 2013). The expansion site is identified as Stage 2 in the Leopold Sub Regional Activity Centre Concept Plan (DPO30) and the approved Development Plan.

The Strategy on page 88 outlines the Centre's future role and opportunities, saying: *"Existing planning policy (DPO30) supports the future expansion of the centre in a northerly direction along Melaluka Road"*.

The Strategy (Table 5) forecasts that by 2036 there will be demand for an additional 15,800sqm of retail floorspace at the Leopold Sub-Regional Activity Centre. The Strategy further estimates 12,200sqm of restricted retail floorspace at the Leopold Homemaker Centre (current offer being the 12,300sqm Bunnings Store opened in late 2016). Northerly expansion will implement a key design principle for the Centre to create a mixed use, pedestrian based, main street treatment along Melaluka Road.

In regard to concerns raised about the location of indicative centres shown in the Retail Strategy and Clause 21.19, officers agree to make corrections. The centres will be designated consistent with the locations shown on *Plan 02 Future Urban Structure* of the Northern and Western Geelong Growth Areas Framework Plan. This will include adding in the Western Geelong Growth Area proposed Specialised Activity Centre.

Submissions by the Ramsey Property Group for the Central North Local Centre to be moved into the Creamery Road precinct are not supported. The Northern and Western Geelong Growth Areas Framework Plan on pages 238-39 shows this centre located on the intersection of Ballarat Road and Ballan Road. The ultimate location of the centre will be subject to further assessment during the precinct structure planning process.

We agree with the submissions of the McCann Family as stated above. We will also add the indicative Specialised Activity Centre (Western Growth Area) to the Geelong Retail Centre Hierarchy map.

Also, to avoid confusion and ensure consistency in the Strategy, all Northern and Western Geelong Growth Area centres will be described as 'Neighbourhood Activity Centres' (not as a 'Local Centre' – which were the names given to the centres as part of the initial economic assessment associated with the Northern and Western Geelong Growth Areas Framework Plan).

Clause 21.19 and 22.03 drafting

Submissions from Kaufland, Ramsey Property Group and Shell Road Developments say that the proposed Clauses 21.19 and 22.03 are inflexible and onerous.

Other submitters support the policies however request some changes. More specifically:

- ALDI request inclusion of a policy statement to encourage diversity and competition between different sized supermarkets at the sub-regional and neighbourhood activity centre level.
- Lascorp request to rectify the retail floor space demand for the Leopold Sub-Regional Centre in Table 1 of Clause 21.19.
- Lovely Banks Development Group request changes to Clause 21.19-2;
 - the third dot point under 'General Strategies' should be amended to add the word 'regional' in relation to entertainment and cultural activities being directed to Central Geelong.
 - amend the third dot point under 'Retail Hierarchy' to add the following sub-point 'the proposal is consistent with an approved precinct structure plan'.
 - add an additional dot point under Further work as follows: 'Prepare a Framework Plan and Precinct Structure Plans for the Northern and Western Growth Areas to manage the provision of retail centres in these areas.'
- Westfield Geelong request changes to Clause 21.19 as follows;
 - under 'Retail Hierarchy' within 21.19-2 second dot point, delete the preamble '*where a permit is required for use*'...
 - under 'Retail Hierarchy' within 21.19-2 third dot point, queries the omission of centre expansion being 'discouraged' where the economic impact to nearby centres exceeds 10%.
 - under 'Commercial and industrial land' within 21.19-2, queries whether this will lead to the ad hoc establishment of new supermarket based centres that will undermine the Retail Hierarchy.
 - under 'Preferred Location' within 21.19-2, suggests that a minimum distance of 800m walking distance to residential zoned land is more appropriate (not 400m).
- Westfield Geelong request changes to Clause 22.03 as follows;
 - under 'Policy Basis' queries encouraging the provision of 'supermarket based centres' within a 400m distance of residential zoned land. Suggests the distance be a minimum of 800m.
 - under the 'Policy' section, queries whether the term 'Use applications' should be replaced with 'Use and buildings and works applications'. This will allow for a determination of whether buildings & works is 'low' or 'high' impact.
 - the determination as to whether a proposal is 'low' or 'high' impact should also be based on: (1) whether the total floor space demand until 2036 (Cl 21.19 Table 1) will be exceeded; and (2) whether the proposal will impact on the timing, delivery and viability of other retail centres.
- Shell Road Developments request removal of the Clause 22.03 'high impact' v 'low impact' assessment pathways when assessing various forms of proposed activity centres.

- Kaufland request a review of the drafting of clause 22.03 to more clearly explain circumstances where out-of-centre development would be acceptable.

Officer response

Inconsistencies in the proposed amendment documentation will be corrected.

We have reviewed the Kaufland request and do not propose to redraft Clause 22.03 to “more clearly annunciate circumstances where out-of-centre development would be acceptable”. Out of centre applications would be considered on their merits and more than likely deemed high impact. This would require the preparation of an economic impact assessment, including a net community benefit assessment.

The Lovely Banks Development Group’s requested changes are generally supported. Words will be added to the ‘General’ strategy to support local events in all centres. We don’t consider it necessary to add to the ‘Retail Hierarchy’ strategy to ensure proposals are consistent with an approved precinct structure plan because this issue is addressed under ‘Planned Centres’. Adding a ‘Further work’ provision is not appropriate as the Northern and Western Growth Area centres are indicative only. Further work is only identified for some existing centres where there are opportunities to improve land use and urban design outcomes. Regardless, transition to the Planning Policy Framework will remove ‘Further work’ provisions from the Scheme.

The Westfield submission requests a number of changes which are generally not supported. The submission misinterprets the purpose of the *Supportable Retail Floor Space Guidelines to 2036* table. The purpose of the table is not to prevent an expansion of floor space for any individual centre but to forecast when (and by how much) there will be sufficient retail demand to grow a centre. Centre expansion is supported where the role and function of the centre continues to comply with the Geelong Retail Centre Hierarchy.

We have reconsidered the strategy to locate new centres within a 400 metre walking distance to residential zoned land. The designated distance has not been consistently applied across the proposed scheme provisions and Retail Strategy. We agree to change the distance to 800m for all retail centres. We also agree to delete the preamble ‘*Where a permit is required for use*’... at Clause 21.19-3 ‘Retail Hierarchy’ strategy second dot point.

Overall, the proposed new clauses are not considered to be inflexible or onerous.

There are also proposed changes that are not the result of submissions but further review by officers. These changes are:

1. Removal of Table 1 *Supportable Retail Floor Space Guidelines to 2036* from Clause 21.19. Having considered the submissions it appears that the intent and use of the guidelines is confusing. As discussed above, the guidelines indicate which centres could sustain floor space growth due to population growth, not that a centre can only grow to the amount specified in the table. The guidelines may serve lesser purpose given the requirement for an economic impact assessment to demonstrate whether growth could be supported within a centre. Furthermore, the guidelines are a snap shot in time and would be difficult to keep up-to-date.

The guidelines will be retained in the Retail Strategy which is proposed to be a background document in the Scheme. The information should remain available for decision-makers and investors seeking direction or understanding about a retail centre.

2. A provision has been added to Clause 21.19-3 *Strategies*, to provide guidance in the assessment of retail applications in the Residential Growth Zone.

3. Change the word “should” to “must” in the Clause 22.03 provision: *Proposals considered low impact should submit an economic impact assessment*. This change brings the provision in-line with the Strategy where on page 65 low impact proposals are required to submit an economic impact assessment.

A revised Clause 21.19 and Clause 22.03 is shown in **Appendix 2**.

Other submissions

The owner of Bell Park Plaza at 222 Anakie Road suggests the centre should be classified as a neighbourhood activity centre.

Officer response

The Retail Strategy designates the centre as a ‘Dispersed Centre’ on page 170. The centre is constrained, predominately located on commercial 2 zoned land and anchored by an ALDI store. It is located less than 800m from the Bell Post Hill Shopping Centre which is included in the Geelong Retail Hierarchy as a neighbourhood activity centre.

Dispersed centres do not form part of the hierarchy and we do not support inclusion of the Bell Park Plaza as a neighbourhood activity centre as part of Amendment C393. Any request to include or expand the centre would need to assess impacts on the viability of nearby retail centres, notably Bell Post Hill. The Strategy says this centre may be included as a neighbourhood activity centre if it can demonstrate that it will not impact on nearby centres.

Financial Implications

The City of Greater Geelong is the planning authority for the Amendment and has initiated the Amendment. Costs associated with the panel hearing are the responsibility of Council. Council will also engage legal representation and an expert witness to appear at the hearing. Total costs for this next stage of the Amendment process is estimated to be in the range of \$50,000-\$60,000.

Stakeholder Consultation and Communication

The Amendment was exhibited in accordance with the provisions of the *Planning and Environment Act 1987* and 14 submissions were received.

Council officers met with Lascorp Development Group, Ramsey Property Group, Shell Road Developments and Lovely Banks Development Group to discuss their submissions.

Emails were sent, generally agreeing to submission requests, to the following submitters: Tract (acting for the McCann Family), ALDI Stores, APD Projects and A. Alexander (acting for Algo Properties).

Ramsey Property Group withdrew their submission in writing dated 11 August 2019.

ALDI Stores withdrew their submission in writing dated 16 August 2019.

In accordance with Clause 4(2) of Ministerial Direction No. 15 panel hearing dates were set for this Amendment, with the main hearing exhibited to commence in the week of 26 August. Due to the additional time required to consider the submissions, the hearing dates have been changed in consultation with Planning Panels Victoria.

The panel hearing will now be held in the week commencing 28 October 2019. All submitters have been informed of the change of date.

Planning Panels Victoria will notify all submitters referred to it of the Panel dates and invite requests to be heard at the Panel Hearing.

Policy/Legal/Statutory Implications

The exhibited Explanatory Report outlines the key state, regional and local planning policies that have been considered in preparing the Amendment. This includes the proper use of the Victoria Planning Provisions and compliance with relevant Ministerial Directions.

Alignment to City Plan

The Amendment supports the 'Growing our Economy' strategic direction of City Plan by providing local construction jobs, housing diversity and affordability and small business opportunities.

Conflict of Interest

No Council officer involved in the preparation of this report has any direct or indirect interest, in accordance with Section 80(c) of the Local Government Act.

Risk Assessment

There are no notable risks associated with implementing the recommendation contained in this report.

Environmental Implications

The Amendment does not directly impact on land use and development. Any 'on the ground' effects would be considered during a rezoning or planning permit application process.

However, at a policy level, the Amendment supports the established retail hierarchy, urban consolidation objectives and convenient and walkable access to centres.

Appendix 1 – Changes to Clause 21.19, Clause 22.03 and the Schedule to Clause 34.01 Commercial 1 Zone (highlighted yellow)

GREATER GEELONG PLANNING SCHEME

21.19 Activity Centres

DD/MM/YYYY
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21.19-1 Key Issues and Influences

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The City of Greater Geelong is forecast to experience significant population growth increasing the demand for new and expanded retail services.

Retail centres should contribute to the vibrancy and attractiveness of suburbs and townships.

A retail centre is defined as:

Any place where retail transactions take place for goods and services and where one or more of the following conditions apply:

- The retail activity is lawful under all relevant statutes including the Planning and Environment Act
- The location accommodates at least one shop, and
- The total floor space of the shop(s) exceeds 500sqm.

A place can be a 'retail centre' without being an 'activity centre' which includes a range of other community facilities and services.

A centre which develops without the need for a planning permit for the use, is not automatically included within the Geelong Retail Centre Hierarchy at Clause 21.19-5.

The boundary of a 'retail centre' includes those contiguous land parcels into which the existing or planned uses might lawfully locate without the need for a Planning Scheme Amendment.

Retail centres should be easily accessible and conveniently located, minimising the need for, and length of, car trips.

Activity centres support a range of uses including retail, commercial, accommodation, community, cultural, education, social, entertainment, leisure and civic services.

The Geelong Retail Centre Hierarchy identifies the role and function fulfilled by centres of different sizes. The retail hierarchy supports the primacy of Central Geelong as the focus of retail and cultural activity in the region.

Successful shopping centre networks typically feature strong representation from across the 4 retail systems. These systems including fast retail (supermarkets, bottle shops), slow retail (café, deli's), cultural retail (museums and galleries) and restricted retail (hardware, furniture).

Analysis into current retail demand and supply trends in Greater Geelong finds the following:

- Pressure to approve new centres in out of centre locations is expected to continue.
- Demand for additional retail floor space will increase overtime in line with population growth.
- There is sufficient Commercial 2 Zoned land to accommodate future demand for restricted retail uses within Greater Geelong particularly on the Bellarine Peninsula.
- Supermarket and bottleshops dominate retail sales across Geelong.
- Townships on the Bellarine struggle to create a year round retail market relying heavily on the summer tourism period. Improvements in the slow and cultural retailing offer will be important for these locations.
- The 4 retail systems are currently not occurring in retail centres in Geelong particularly in Central Geelong.

Council has planned for the establishment of new activity centres within identified growth locations to meet the needs of future residents.

Increased residential densities in increased housing diversity areas will support the viability of existing retail centres improving walkability and limiting travel times required to access essential day to day services.

GREATER GEELONG PLANNING SCHEME

The retail hierarchy will be enhanced through high quality urban design and improved pedestrian and public transport accessibility.

Greater Geelong exhibits a number of factors that contribute to an increased vulnerability to problem gambling which requires sensitive consideration of their location.

21.19-2 Objectives

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- To consolidate and strengthen the established Geelong Retail Centre Hierarchy
- To facilitate the development of vibrant and viable retail centres
- To ensure that Central Geelong remains the primary activity centre in the municipality.
- To ensure that new retail development complies with the Geelong Retail Centre Hierarchy included at Clause 21.19-5, and failing this, provides a net community benefit.
- To encourage a competitive supply of goods and services.
- To encourage walkable access to retail and activity centres from residential areas.
- To distribute restricted retail activity across the retail hierarchy.
- To ensure there is a diversity of uses in all centres, particularly in Central Geelong, Town and Sub-regional Centres.
- To encourage retail centres to become activity centres over time.
- To support the expansion of existing centres.
- To ensure new retail centres have direct access to a major road and good access to public transport.
- To limit retail uses in industrial zones.
- To provide ~~an appropriate~~ forward land supply for retail and activity centre development to meet the current and anticipated demand in greenfield locations.
- To avoid the risk of exacerbating problem gambling.

21.19-3 Strategies

General

- Encourage a mix of retail, office, cafes, higher density housing, education and community facilities to locate within centres, but particularly Central Geelong, Sub-regional and Town Centres.
- Support accommodation uses above ground level floor space in retail and activity centres subject to appropriate provision of parking and access requirements.
- Direct entertainment and cultural activities to Central Geelong [and support local events in other centres.](#)

Gaming

- Direct the location of gaming machines to venues that makes gaming accessible but not convenient as detailed in Clause 22.57.

Retail Hierarchy

- Direct new retail development to existing centres, consistent with the role and function described in the Geelong Retail Centre Hierarchy included at Clause 21.19-5.
- ~~Where a permit is required for use, s~~Support in centre or edge of centre development where it can be demonstrated that there are no adverse impacts on the operation of the Geelong Retail Centre Hierarchy.
- Support the development of new retail centres where it can be demonstrated that;
 - additional floor space cannot be delivered in the existing network of centres;
 - there is demand for additional floor space;
 - the economic impact on a nearby centre is less than 10 per cent; and
 - where a net community benefit can be achieved.

GREATER GEELONG PLANNING SCHEME

- Direct the location of discount department stores to Central Geelong and sub-regional centres.

Planned Centres

- Discourage planned centres in greenfield locations becoming larger than the maximum leasable floor area identified in the schedule to the Commercial 1 Zone, prior to all planned neighbourhood and sub-regional centres establishing, to ensure new communities have timely and convenient access to services.
- Ensure that the use and development of any planned centre is consistent with an approved Development Plan or Precinct Structure Plan.

Uses

- Encourage diversity and competition between different sized supermarkets in sub-regional centres and neighbourhood activity centres.
- Encourage new supermarket developments to provide floorspace for other uses.
- Encourage development that supports different forms of fast, slow, cultural and restricted retailing systems within all retail centres, but particularly in Central Geelong.

Residential Growth Zone land

- Ensure that retail use and development on residential growth zoned land adjoining an existing centre:
 - can physically connect to the centre or provide new or upgraded infrastructure to provide safe and convenient connectivity to the centre; and
 - is designed and sized to operate without amenity impacts to neighbouring residents.

Commercial and industrial land

- Discourage retail use and development in industrial areas unless associated with an industrial use occurring on the land or it can be demonstrated that it will meet the needs of people employed in the area.
- Where a planning application for use is required for a new or expanded supermarket based centre within the commercial 2 and industrial 3 zone, ensure;
 - that the development does not have a significant economic impact on a nearby centre(s) identified within the Geelong Retail Centre Hierarchy and
 - that the centre provides a net community benefit.

Restricted Retail Uses

- Direct restricted retail use and development to nominated restricted retail precincts as identified in the Geelong Retail Centre Hierarchy.
- Support the development of smaller scale, higher density restricted retail uses such as homewares within retail and activity centres in preference to identified homemaker precincts.

Preferred Location

- Locate new retail centres on sites that have existing or potential future access to public transport.
- New retail centres should have direct access to a Category 1 or 2 zoned road.
- Locate new centres within an 400 metre walking distance to residential zoned land, reducing car usage and encouraging walking.

Design and Layout

- Encourage the redevelopment of car parking areas for commercial and residential uses where adequate car parking requirements for existing and future development can be achieved.
- Support increased intensity and vertical growth of centres to encourage expansion and to reduce the need to develop new centres.

Retail Demand

GREATER GEELONG PLANNING SCHEME

- Support the use of maximum leasable floor areas in the Schedule to the Commercial 1 Zone, for sub-regional centres and in greenfield locations, and where;
 - the size of a centre needs to be restricted to protect the retail hierarchy, or
 - to encourage the timely delivery of a planned centre.
- ~~Direct development to centres identified in table 1, where demand for floor space has been identified.~~

Table 1 Supportable Retail Floor Space Guidelines to 2036*

Centre Name	Total floor space including existing, vacant and planned floor space sqm 2016	Total floor space demand sqm 2036	Amount of supportable floor space sqm 2036*
Regional Centre			
Central Geelong	213,300	215,400	+102,100
Sub-regional Centre			
Belmont	44,000	59,600	+15,600
Waurin Ponds	41,800	60,800	+19,000
Cerio SC	27,500	42,100	+14,600
Leopold	20,600	34,500	+13,900
Armstrong Creek	40,000	46,700	+6,700
Specialised Centre			
Pakington St	43,100	58,000	+14,900
Town Centre			
Ocean Grove	16,700	19,400	+2,700
Drysdale	15,100	22,800	+7,700
Lara	15,100	20,500	+5,400
Barwon Heads	10,300	11,600	+1,300
Portarlington	7,200	9,600	+2,400
St Leonards	2,300	5,300	+2,000
Neighbourhood Centres			
Shannon Ave (Geelong West)	12,900	17,400	+4,500
Separation Street	6,000	9,100	+3,100
Pakington Street (Newtown)	9,500	13,900	+4,400
Highton	7,100	9,500	+2,400
Newcomb Central	7,400	9,500	+2,100
Geelong East	6,100	9,100	+3,000
Bellarine Village	6,900	9,100	+2,200
Bell Post SC	5,600	7,900	+2,300
Barrabool Hills Shopping Centre	4,200	5,500	+1,300
Shannon Ave (Newtown)	4,900	6,100	+1,200
Ocean Grove (Marketplace)	5,800	6,700	+900
Vines Road	3,200	4,700	+1,500
Fyansford	11,800	10,800	-1,000
Grovedale Central	2,700	3,200	+500
Dorothy Street	1,800	2,800	+1,000
Ash Road	1,800	3,100	+1,300
Rosewall	1,700	2,200	+500
Jetty Road	4,200	3,300	-900

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Warralily	8,800	16,100	+7,300
Surf Coast Hwy			
Lara West	3,400	4,600	+1,200
Armstrong Creek West	4,700	800	-3,900
Horseshoe Bend North East	3,000	1,500	-1,500
Kingston Downs	7,000	4,300	-2,700
Restricted Retail Centre [△]			
Drysdale	3,600	5,000	+1,400
Geelong Gateway	33,600	50,600	+17,000
Waurm Ponds	47,300	76,000	+28,700
Melbourne Rd (Norlane)	23,600	36,100	+12,300
Melbourne Rd (North Geelong)	14,300	22,200	+7,900
Sinclair St	4,100	7,800	+3,700
Leopold Central	12,300	20,400	+8,100
Armstrong Creek	25,000	24,400	-600

*Supportable floor space is defined as all retail uses.

#Where the amount of supportable floor space includes a 'minus', the size of this centre already exceeds retail demand.

△Excludes dispersed Restricted Retail Centres.

21.19-4 Implementation

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These strategies will be implemented by:

Using policy and the exercise of discretion

Using the Assessment Criteria for Retail Planning Applications Policy at Clause 22.03.

Using the Gaming Policy at Clause 22.57.

Further work

- Prepare Structure Plans or Urban Design Frameworks for Belmont and Waurm Ponds Sub Regional Centres to guide the ongoing development of these centre.
- Prepare a Structure Plan for Pakington Street (Geelong West) and the Gordon Ave Homemaker Precinct. The plan should consider rezoning opportunities and review the role of the Gordon Ave Homemaker Precinct.
- Prepare a Structure Plan or Urban Design Framework for Separation Street Neighbourhood Centre to facilitate growth of the centre and streetscape improvements.

References

Greater Geelong Gaming Policy Framework, City of Greater Geelong, 2007.

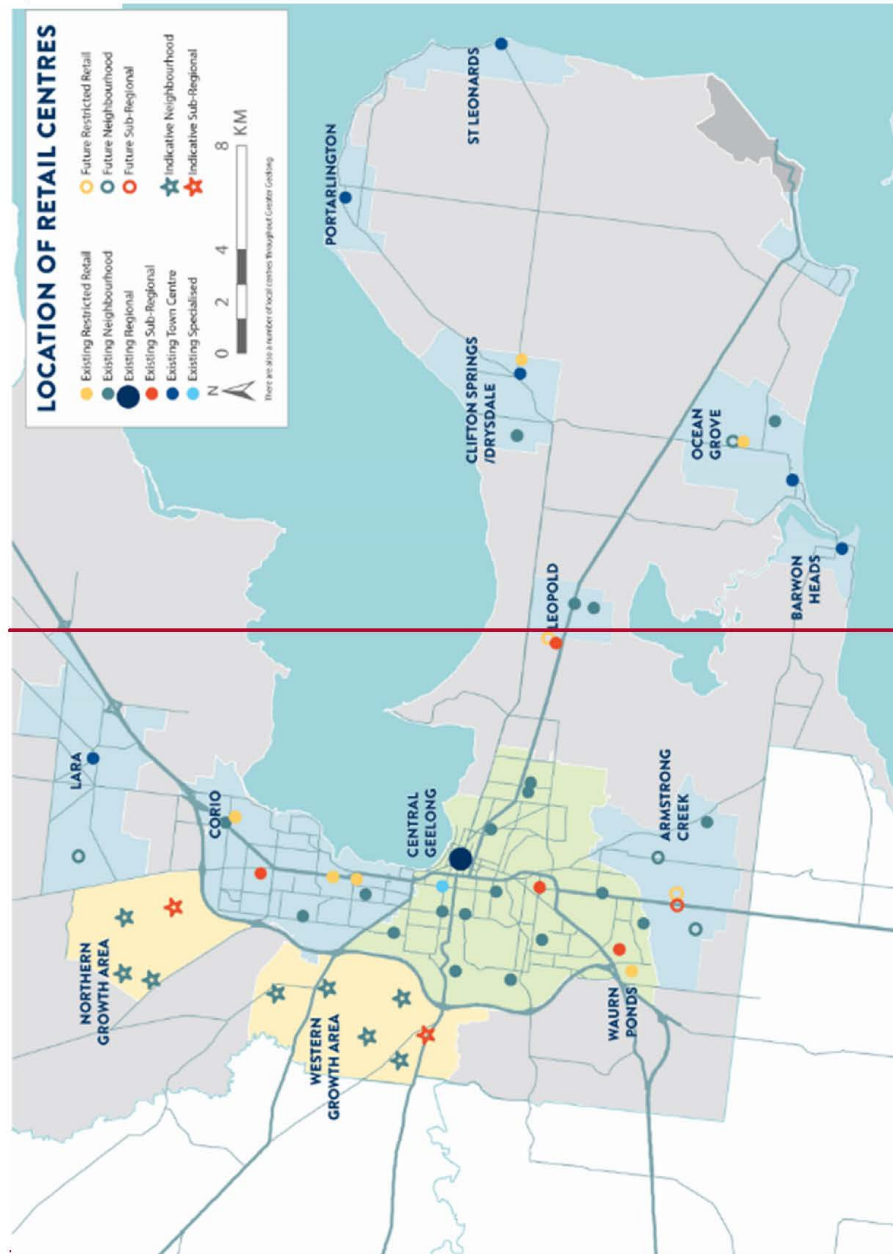
Armstrong Creek Town Centre, Precinct Structure Plan, March 2014

City of Greater Geelong Retail Strategy 2016-2036, November 2018

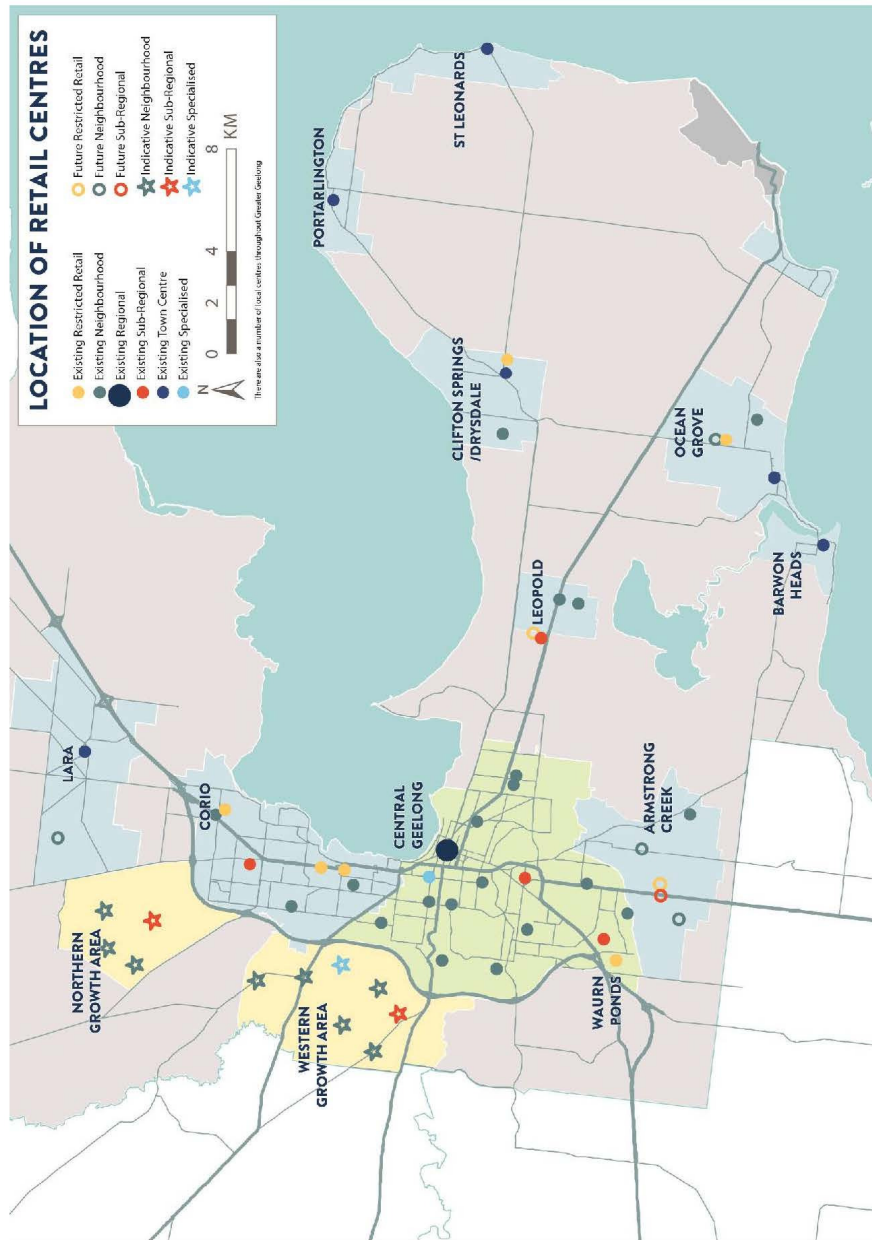
GREATER GEELONG PLANNING SCHEME

21.19-5 Geelong Retail Centre Hierarchy

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GREATER GEELONG PLANNING SCHEME



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Type of Centre	Level in Hierarchy	Indicative retail floorspace range	Centres
Regional	A major retail centre that serves a wide catchment and is anchored by one or more department stores, discount department store(s), supermarket(s), mini major(s) and speciality stores. Often associated with bulky goods adjacent to or near the core retail centre. Provides a full range of retail needs and more successful when associated with entertainment and leisure activities such as cinemas and restaurants or niche retail precincts	More than 100,000 sqm	Geelong CBD
Sub-Regional	A major retail centre that serves a wide catchment (but smaller than a regional centre) and is anchored by one or more discount department stores, supermarket(s), mini major(s) and speciality stores. Because of their smaller size, they have less provision for higher-order activities including full-line department stores, and the range of specialty shopping is less extensive.	15,000 to 60,000 sqm	Belmont, Waurn Ponds, Corio, Leopold, Armstrong Creek
Specialised	More traditional major centres that have grown from strip shopping centres and which are typically located along main arterial routes and/or public transport nodes. Tend to capture niche trade from wider catchments in addition to having an important community role as the focus for retail, civic, and community uses.	15,000 to 60,000 sqm	Pakington Street (Geelong West)
Town Centre	Major community shopping locations providing weekly grocery shopping for the local township in combination with specialty store shopping that also services visitors to the region	2,000 to 20,000 sqm	Ocean Grove, Drysdale, Lara, Barwon Heads, Portarlington, St Leonards

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Type of Centre	Level in Hierarchy	Indicative retail floorspace range	Centres
Neighbourhood	A retail centre that serves a neighbourhood catchment and is anchored by one or more supermarkets plus speciality stores	2,000 to 15,000 sqm	Shannon Ave (Geelong West), Separation St, Pakington St (Newtown), Highton, Newcomb Central, Geelong East, Bellarine Village, Bell Post SC, Barrabool Hills SC, Shannon Ave (Newtown), Ocean Grove (Marketplace), Vines Rd, Fyansford, Grovedale Central, Dorothy St, Ash Rd, Rosewall, Jetty Rd, Warralily, Lara West, Armstrong Creek West, Horseshoe Bend North East, Kingston Downs, Surf Coast Highway
Local	Small groups of shops serving a limited catchment, and typically providing for the daily convenience needs of residents in the surrounding area	Up to 5,000 sqm	Dispersed location across the municipality
Restricted Retail (Homemaker)	A collection of bulky goods stores, generally comprising furniture, white goods, electrical, floor and window coverings, lighting, hardware and related retail operations Can be adjacent to core retail centres or in stand-alone precincts	50,000+	Geelong Gateway, Geelong West, Waurm Ponds, Melbourne Rd (Norlane), Melbourne Rd (North Geelong), Sinclair St, Anakie Rd, Leopold Central, Armstrong Creek

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22.03 Assessment Criteria for Retail Planning Applications

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This policy applies where a planning scheme amendment or planning permit is required for the use and/or development of land for a new or expanded provision of retail floorspace.

Policy Basis

The City of Greater Geelong is forecast to experience significant population growth increasing the demand for new and expanded retail services. It is critical to ensure our community has access to every day services within a 20 minute drive from home. Our retail centres should be encouraged to grow and transition over time to activity centres extending their offer to include uses other than retail.

The Geelong Retail Centre Hierarchy has been established to articulate the role and function fulfilled by centres of different sizes. The retail centre hierarchy can be found at Clause 21.19.

Expanding our existing centres is encouraged over developing new centres in out of centre locations

The expansion of several existing centres in Greater Geelong are constrained particularly at the subregional and neighbourhood centre level. Expansion of these centres should consider opportunities to make better use of at grade car parking areas and expand in a vertical direction.

~~Retail~~ ~~Supermarket-based~~ centres should be within an ~~4~~800 metre walking distance to residential zoned land to limit car usage, encourage urban consolidation and better utilise existing infrastructure.

Growth should be directed to the locations identified in Clause 21.19. The amount of growth supportable within these locations will be determined by the application requirements identified within this clause.

A proposal which increases the floor area of an existing centre and remains consistent with the role and function of a centre identified in the Geelong retail centre hierarchy is considered a low impact proposal.

Out of centre development or development which alters the role and function of a centre identified in the Geelong retail centre hierarchy is considered to be a high impact proposal.

New development should provide high quality built form outcomes which are sympathetic to the character of the surrounding area and minimises amenity impacts on nearby sensitive land uses.

Objectives

- To ensure that applications or rezoning requests for new and expanded centres establish a demand for such use and demonstrate that there are no adverse impacts on nearby centres or the operation of the retail centre hierarchy.
- To support the viability of centres identified in the retail hierarchy.
- To ensure all high impact proposals provides a net community benefit
- To guide consideration of applications involving an increase in a maximum leasable floor area identified in the schedule to the Commercial 1 Zone,
- To ensure the design and layout of new or expanding centres minimise amenity impacts on surrounding uses and contributes positively to the streetscape and surrounding area.

Policy

Use applications

It is policy that an application demonstrate if the proposal is low or high impact, based on the following;

- a) Whether the proposal is considered to be in centre, edge of centre or out of centre.

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- b) Whether the proposal conforms with the role and function identified in the Geelong Retail Centre Hierarchy as outlined in the table at Clause 21.19-5.

Proposals considered low impact ~~must~~ **should** submit an economic impact assessment.

Proposals considered high impact must submit an economic impact assessment, including a net community benefit assessment.

Buildings and works applications

It is policy to:

- Ensure blank walls and loading bays are not adjacent to sensitive land uses and key vehicle and pedestrian accessways to a centre.
- Ensure illuminated signage does not impact on sensitive land uses.
- Ensure new development provides visually interesting and active street frontages where buildings abut the street or a public space.
- Encourage car parking areas to be located to the side or rear of a centre.
- Ensure car parking areas do not visually dominate the front setback area of a centre by providing landscaping including canopy trees.
- Ensure there are safe and convenient pedestrian connections from car parking areas and the surrounding footpath network to the entrance(s) of a centre.

Application Requirements

Economic Impact Assessment

The following issues and information are required to be addressed as part of an economic impact assessment:

General

- Amount of overall retail floorspace.
- Number of retail tenancies and their floor area.
- All proposed land uses.
- The location and amount of floor space dedicated to shop uses within the development if the centre is listed in the schedule to the Commercial 1 Zone.
- Assessment of any likely impact on existing, planned or approved retail facilities.
- Description of anticipated benefits to the community (whether or not these can be monetised).
- Estimated net employment benefits (if any).

Retail Supply

- The existing supply of retail floor space serving the catchment, by type, size, role and function.
- Details of any other proposals for new or expanded retail development in the catchment or beyond, which could have an effect on the proposal, existing centres or planned development.
- Demonstrate how the proposed retail floorspace would fit into the Geelong retail centre hierarchy as detailed in Clause 21.19.
- Demonstrate whether the existing supply of retail floorspace is adequate to meet existing and foreseeable demand levels over a 15 year period.
- Whether there are any existing retail gaps in merchandise/services which the proposal will fill.

Retail Demand

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- The need or demand for new or expanded retail floorspace provision to serve the identified catchment, taking into consideration the objectives and strategies contained in Clause 21.19.
- The current catchment population, forecast population and retail spending growth rate for a 15 year period.
- The extent to which the proposal will draw trade from beyond the catchment, and from passing trade.
- Whether the proposed or expanded retail provision would mean an expansion in the size of the catchment of that centre.
- Impacts on the catchment of nearby centres and the effect this may have on centres within those catchments.

Escape Spending

- Estimates of existing levels of escape spending from the catchment.
- Estimates on the share of this escape spending that could reasonably be retained by the proposal.

Impact on Existing Retail Facilities

- Assessment of the expected trading effects on existing or planned retail facilities based on each of the following scenarios; where relevant:
 - The proposal did not go ahead and existing centres in the catchment continue to trade.
 - The proposal is located adjoining an existing nearby centre already identified in the retail hierarchy or
 - Where an out of centre development is proposed, if the centre was approved.
- Demonstration of the extent to which the proposal is expected to lead to an overall improvement in the provision of retail facilities to the catchment population, including the potential for retaining spending that would otherwise escape to other centres.
- Demonstrate that the proposal will improve access to services by reducing travel times for residents.
- Demonstrate that a proposal which results in a development exceeding the maximum floor area specified in the schedule to the Commercial 1 Zone, does not impact on the timing, delivery and viability of other retail centres including planned centres.
- High impact proposals must demonstrate a net community benefit. The assessment must:
 - Establish a realistic outlook of what the floor space growth may be in the catchment, in the absence of the proposal over the coming 15 years (base case).
 - For an out of centre proposal, consider what the costs and benefits to the community are, if the out of centre proposal was to proceed as proposed.
 - Compare the costs and benefits of the proposal against the costs and benefit of the established base case.
 - Quantify and monetise the costs and benefits of the proposal versus the base case
 - As a minimum, the following costs must be considered:
 - Greater motorised travel externalities (air pollution, greenhouse gas emissions, congestion)
 - Reduced consumer surplus (shoppers paying more in vehicle operating costs to achieve similar retail service outcomes).
 - Lost opportunities for more consolidated urban development.

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- Potentially, impacting considerably on competing centres within the planned hierarchy (persistent vacancies, vandalism etc).
- Potential foregone opportunities for co-location of retail services with community uses.
- Potential loss of employment development through displacement of strategic commercial or industrial land.
- As a minimum, the following benefits must be considered:
 - Improved amenity and place quality at the out of centre location achieved through the development
 - Potentially, earlier provision of expanded retail services for the catchment population.

The Responsible Authority may waive any of the above requirements relating to an economic impact assessment.

Out of centre applications

An application for an out of centre development must demonstrate:

- Why the proposal cannot be accommodated within an existing centre identified in the retail hierarchy.
- Why the proposal cannot be accommodated on the edge of an existing centre identified in the retail hierarchy.
- That the proposal will not significantly impact on the character and amenity of the surrounding area.
- That the location of the centre will reduce travel times for the community when compared to nearby existing centres with a similar retail offer.
- That the centre has excellent connectivity to the surrounding residential area(s).
- That the proposal will not result in traffic and safety conflicts between cars, trucks and pedestrians external to the site.

References

City of Greater Geelong Retail Strategy 2016-36, November 2018

GREATER GEELONG PLANNING SCHEME

27/11/2014
C269
[Proposed C393](#)

SCHEDULE TO CLAUSE 34.01 COMMERCIAL 1 ZONE

Land	Maximum leasable floor area (m2) for office	Maximum leasable floor area (m2) for shop (other than restricted retail premises)
Certificate of Title Vol. 9960 Fol. 950 and Lot 2, Certificate of Title Vol 10982 Fol 810 located at the corner of Princes Highway and Pioneer Road, Grovedale	None specified	38,100 35,000
Corio Shopping Centre, corner Purnell and Bacchus Marsh Road, Corio	None specified	27,400
Newcomb Shopping and Community Centre, Corner of Bellarine Highway and Wilsons Road, Newcomb	None specified	6,000
South west corner of Heyers Road and Burdoo Drive, Grovedale.	None specified	2,650
Meadowvale shopping centre north of the leisure time centre Corio, east of Anakie Road, Corio.	None specified	6,500
2-20 Kingston Downs Drive and rear of 12-19 Ashwood Close, Ocean Grove (north eastern corner of Kingston downs Drive and Shell Road).	None specified	7,500
Bellarine Gateway Plaza, 621-639 and 641-659 Bellarine Highway, Leopold.	None specified	23,000 30,000 30,000
Lara West Neighbourhood Activity Centre	None specified	5,000
Kingston Downs Neighbourhood Activity Centre, Grubb Road, Ocean Grove	None specified	7,650
Armstrong Creek East Precinct Neighbourhood Activity Centre (Warrally)	None specified	7,700 6,000
Armstrong Creek East Precinct Local Activity Centre	None specified	1,000
Jetty Road Neighbourhood Activity Centre, Drysdale	1,000	6,000
Armstrong Creek West Precinct Neighbourhood Activity Centre	None specified	3,000
Armstrong Creek West Precinct Whites Road Local Activity Centre	None specified	1,000
Armstrong Creek West Precinct Boundary Road Local Activity Centre	None specified	500
Armstrong Creek West Precinct Train Station Local Activity Centre	None specified	1,000
Barrabeel Hills Neighbourhood Shopping Centre (north eastern corner of Province Boulevard and Stoneleigh Crescent Highton)	None specified	3,895

GREATER GEELONG PLANNING SCHEME

Land	Maximum leasable floor area (m2) for office	Maximum leasable floor area (m2) for shop (other than restricted retail premises)
Armstrong Creek Town Centre Precinct 1	None specified	40,000
Armstrong Creek Horseshoe Bend Precinct North East Neighbourhood Activity Centre	None specified	7,000
Armstrong Creek Horseshoe Bend Precinct Southern Local Activity Centre	None specified	1,000
Armstrong Creek Horseshoe Bend Precinct Western Local Activity Centre	None specified	1,000

Appendix 2: Amendment C393 Summary of Submissions and Response

Note: refer to the 'discussion' section of the report for a full response to submissions

No	Submitter	Summary of Submission	Officer Response
1	ALDI Stores	<p>ALDI raises two issues for consideration:</p> <ol style="list-style-type: none"> <p><u>Warralily Village</u> The retention of a 'Shop' floor space cap which is less than the existing and approved shop floor space for Warralily Neighbourhood Activity Centre on Barwon Heads Rd (Armstrong Creek East PSP). Suggests the existing and approved 'Shop' floor space is in the range of 7,500-8,000sqm (including the approved ALDI). Also notes contradictory data in the Retail Strategy.</p> <p>Requests the cap be reviewed to accurately reflect occupied and vacant 'Shop' floor space and the proposed ADLI development of 1,902sqm.</p> <p><u>Northern and Western Geelong Growth Areas</u> In the past, growth area planning tended to deliver neighbourhood centres that cater for a single-line supermarket (i.e. Woolworths or Coles) and some shops. Recent precinct structure planning in Victoria has recognised the emergence of ALDI as a viable and valuable addition to neighbourhood centres.</p> <p>Simply asks that planning principles be adopted in the PSP process or potentially incorporated into policy statements in the Scheme which encourage diversity and competition between different sized supermarkets at the sub-regional and NAC level.</p> 	<p>Agree.</p> <p>Cap to be increased to 7,700sqm.</p> <p>Policy addition to encourage supermarket diversity and competition.</p> <p>The submission has been withdrawn in writing dated 16/08/2019.</p>
2	A. Alexander for Algo Properties (owners of land in the Jetty Road Neighbourhood Activity Centre)	<p>The submission challenges some of the fundamental assumptions in the Retail Strategy as they relate to the Jetty Rd NAC. These are:</p> <ul style="list-style-type: none"> The proposition that retail floorspace supply is transferrable between Ocean Grove, Leopold and Drysdale is only really relevant for higher order retail goods. Drysdale and Curlewis will each need to maintain a type and scale of convenience-based retail goods and services that meets the needs of the local catchments. In Curlewis the local catchment population and therefore expenditure is clearly expected to grow strongly, meaning a material increase in demand for convenience retail goods and services in the local area. 	<p>Agree.</p> <p>Errors to be corrected. Supportable floor space should be 1,400sqm by 2036.</p>

No	Submitter	Summary of Submission	Officer Response
		<ul style="list-style-type: none"> ▪ The suggestion that there will be an oversupply of total retail floorspace in the broader sub-region relies on the assumption that expected floorspace growth in Leopold would directly meet the needs of Curlewis / Jetty Road residents. There is no information available to support this. ▪ The modelling and analysis in the retail strategy appears relevant at the aggregate level and to inform broad retail strategy work, however seeking to use sub-region floorspace projections to make specific recommendations for individual centres ignores the important role of neighbourhood centres in serving local catchments, particularly those which are growing quickly such as Curlewis. ▪ The report's finding that there is a negative increase in supportable floorspace at Curlewis over the next 20 years. As previously stated there is strong expected growth in the catchment leading to an increased supply of floorspace. <p>The submission believes the error in these assumptions can be found on pages 56 and 58 of the Retail Strategy and that the data that populates Curlewis-Jetty Roads demand circle is missing.</p> <p>Requests that the errors be rectified.</p>	
3	APD Projects, part owners and development managers of the Warralily Neighbourhood Activity Centre.	<p>The content of this submission is very similar to the ALDI submission concerning floor space data at the Warralily NAC. Says the Retail Strategy recommendation to maintain the current maximum 'Shop' limit at 6,000sqm in the Scheme is not acceptable knowing it is well short of the current and permitted space.</p> <p>Requests the Warralily NAC cap be reviewed to accurately reflect occupied and vacant 'Shop' floor space and the proposed ADLI development of 1,902sqm.</p> <p>The submission also requests that Council consider for growth within the next 1-3 years a further 3,700sqm floor space.</p>	<p>Agree.</p> <p>Cap to be increased to 7,700sqm.</p>
4	Geelong Warehouse Traders, 370 Thompson Road, North Geelong	<p>The submission asks that politicians and councils read the submitters report on homelessness and the report on satellite cities and towns, which contains a section to revitalise strip shopping areas.</p>	<p>The submission is not considered to be an objection nor does it request a change to the Amendment.</p> <p>The submission is noted.</p>
5	Merost Pty Ltd, owner of Bell Park Plaza	<p>The submission requests that the Bell Park Plaza be included as a neighbourhood centre for the following reasons:</p> <ul style="list-style-type: none"> ▪ The centre has not impacted on sales at the Bell Post Shopping Centre. 	<p>Do not agree.</p>

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		<ul style="list-style-type: none"> ▪ Sales at Bell Post Shopping Centre have been growing. ▪ Businesses at Bell Park Plaza are typically owned locally and much of the stock is locally produced. ▪ Bell Park Plaza is situated on a main road with good public transport, addresses a service gap, reduces travel distances for shoppers and provides local competition. 	<p>The centre should continue to be classified as a Dispersed Centre.</p>
6	<p>Planning & Property Partners for Kaufland Australia</p>	<p>The submission explains that Kaufland is planning to enter the Victorian market by establishing stores across metropolitan Melbourne and regional areas. Preliminary planning has identified potential opportunities to establish a supermarket in Greater Geelong including proximate to the Waurin Ponds Sub-Regional Activity Centre.</p> <p>The submission suggests that clauses 21.19 and 22.03 be treated with a degree of flexibility in relation to land use, activity centre boundaries, avoiding limitations on retail floor space and pre-determining the future role of the Waurin Ponds centre in terms of its scope for growth.</p> <p>Requests a review of the drafting of clause 22.03 to more clearly explain circumstances where out-of-centre development would be acceptable.</p>	<p>Do not agree.</p> <p>No change to Clause 22.03 required.</p>
7	<p>ERM for Lascorp Development Group (interests in the Leopold Sub-Regional Activity Centre and developer of the Kingston Downs Neighbourhood Activity Centre, Grubb Rd. Ocean Grove)</p>	<p>ERM lodged two separate submissions which have been combined and referred to as submission no. 7.</p> <p><u>Kingston Downs NAC</u> Notes that the Retail Strategy and C1Z Schedule propose a 'Shop' floor space cap of 7,650sqm. The submission says that given the area is experiencing significant population growth, it is premature to include a 'Shop' floor space cap. The submission requests that the cap be removed.</p> <p><u>Leopold Sub-Regional Activity Centre</u> Notes that Lascorp own a 6.1 hectare vacant property at 601 Bellarine Hwy. This property abuts the existing centre to the west and has direct exposure to the Bellarine Hwy.</p> <p>The submission considers that the policy settings of directing future restricted retail north along Melaluka Rd is undesirable. Locating restricted retail premises to the rear (north) of the existing centre, with access from Melaluka Rd, would significantly compromise the occupation of the centre and therefore undermine the performance and viability of the centre.</p> <p>Goes on to say there would be a substantial net community benefit as a result of locating a future Homemaker Centre (together with other retail uses) on the 'western' land located at 601 Bellarine Hwy. Considers the</p>	<p>Agree in part.</p> <p>Leopold Sub-Regional Centre cap to be increased to 30,000sqm.</p> <p>Kingston Downs NAC shop floorspace cap to remain.</p>

No	Submitter	Summary of Submission	Officer Response
		<p>'western' site to be a superior site for expansion of the centre and requests that further strategic work is required to explore this opportunity, particularly as the land to the north is not zoned for retail uses.</p> <p>The submission recommends changes to the Retail Strategy at pages 70 and 88 to recognise the need for further strategic work.</p> <p>The submission also highlights apparent inconsistencies and errors in the C1Z schedule and clause 21.19 and recommends to:</p> <ul style="list-style-type: none"> ▪ Amend the maximum lease floor area for a 'Shop' use for <i>Bellarine Gateway Plaza</i> (Leopold Sub-Regional Centre) in the exhibited Schedule to the C1Z to be 30,000sqm (instead of 23,000sqm). ▪ Rectify the retail floor space demand for the Leopold Sub-Regional Centre in Table 1 of Clause 21.19 and Table 5 '<i>Supportable Floorspace – All Retail</i>' (p. 57) of the retail Strategy. 	
8	Lovely Banks Development Group, controls two-thirds of the land in the Northern Geelong Growth Area	<p>Provides a summary of other relevant current strategic planning policy work; being the City's Settlement Strategy and Northern & Western Geelong Growth Areas Framework Plan.</p> <p>The submission specifically notes that in relation to Amendment C393:</p> <ul style="list-style-type: none"> ▪ Proposed clause 21.19 Table 1 'Supportable Retail Floorspace to 2036' does not incorporate the new centres planned in the Northern Geelong Growth Area. ▪ Proposed changes to the C1Z [Schedule] do not include any reference to the centres planned in the Northern & Western Geelong Growth Areas. <p>Requests changes to the Retail Strategy as follows:</p> <ul style="list-style-type: none"> ▪ Remove confusing information in Table 15C and any like tables which could be misconstrued as providing recommended floorspace allocations in the new growth areas. Any provisions of floorspace should be generated from future precinct structure plans when that detailed work is complete. ▪ Include the correct centre locations in the Framework Plan, for example the centre locations in Figure 6 are incorrect. ▪ Include a detailed explanation of the methodology and purpose of the gravity model which is central to many of the report's recommendations. Further, include reference to the date of the SGS Report that forms the basis of the Strategy and make that report available on the Council Web Site. <p>Requests changes to Clause 21.19-2 as follows:</p>	<p>Agree in part.</p> <p>Changes proposed to Clause 21.19 and the Retail Strategy.</p>

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		<ul style="list-style-type: none"> ▪ The third dot point under 'General Strategies' should be amended to add the word 'regional' in relation to entertainment and cultural activities are directed to Central Geelong. The current wording implies all such activities be in central Geelong no matter what their scale is. ▪ Amend the third dot point under 'Retail Hierarchy' to add the following sub-point 'the proposal is consistent with an approved precinct structure plan'. ▪ Add an additional dot point under Further work as follows 'Prepare a Framework Plan and Precinct Structure Plans for the Northern and Western Growth Areas to manage the provision of retail centres in these areas.' <p>Attached to the submission is an analysis of the Retail Strategy prepared by Deep End Services, dated 20 May 2019.</p>	
9	Morgan & Griffin, owners and developers of Oakdene Estate, Ocean Grove and 231-299 Grubb Road, Wallington	<p>The submission does not support the amendment as exhibited.</p> <p>The submission highlights the planning and policy context of Ocean Grove in relation to Amendment C346, Clause 21.14, the Ocean Grove Structure Plan and the Greater Geelong Settlement Strategy.</p> <p>The primary issue of the submission is with Council's proposal to implement a floor space cap and restrict and control future expansion of the retail centre based on a pre-determined 2036 ultimate population scenario for Ocean Grove. The submission contends this does not consider potential future population growth scenarios that current and proposed strategic planning exercises may deliver.</p> <p>Requests that Council remove the retail floor space cap on the Kingston Downs NAC. Considers it is premature and prejudicial to proper strategic planning processes. Suggests the key justification for removing the cap is that the necessary growth investigation areas and ultimate long-term boundary for Ocean Grove has not yet been determined.</p>	Do not agree.
10	Ramsey Property Group, part of the land consortium for the Western Geelong Growth Area	<p>The submission does not support the amendment as exhibited.</p> <p>The submission provides some context of the planning for the Northern and Western Geelong Growth Areas, including that the Creamery Rd PSP has been identified as the first PSP in the western area. Ramsey Property Group represents the majority of the landowners within this PSP.</p> <p>Raises the following concerns and requests: <u>Location</u>: do not agree with the location of the Central North Local Centre. Given the sequencing of the Creamery Rd PSP this indicative NAC should be moved into the Creamery Rd precinct.</p>	<p>Agree in part.</p> <p>The submission has been withdrawn in writing dated 11/08/2019.</p>

No	Submitter	Summary of Submission	Officer Response
		<p><u>Timeframe for delivery of the first local centre:</u> in relation to the NAC, the Creamery Rd precinct will have commenced by 2022 therefore we would support a 2026 delivery target (not 2036).</p> <p><u>Floor space caps:</u> do not support the notion of the use of floor space caps applied as part of a schedule to the C1Z as it works against market forces. The submission does however agree the retail strategy should support a hierarchy of retail centre across Greater Geelong.</p> <p><u>Inflexibility:</u> overall the strategy is inflexible and may restrict our ability to meet the demands of future population growth.</p>	
11	Minter Ellison for Shell Road Developments (landowner and developer of the Kingston Downs Estate, Ocean Grove)	<p>The submission highlights the following applicable planning controls:</p> <ul style="list-style-type: none"> ▪ DPO22 approved for the Kingston Downs land which contains 7.6ha for a NAC fronting Grubb Rd zoned C1Z, and 14.2ha designated for restricted retail zoned C2Z. ▪ Development of the centre is based on the approved Development Plan and planning permits have been issued allowing subdivision and buildings and works. ▪ The site is affected by DDO39 'Grubb Rd Activity Centre and Restricted Retail Precinct' to guide built form outcomes. <p>The submission requests that the Kingston Downs NAC be entirely excluded from the C1Z Schedule and proposed policy for the following reasons:</p> <ol style="list-style-type: none"> a) The centre is not an unplanned NAC and is aligned with current policy. b) The location and scale of the centre has been tested through various amendment processes. c) The location, scale and composition of the centre is now reflected in the approved zonings, DP and permits. d) Significant investment planning has been undertaken based on these approvals accompanied by community expectations. e) Other nearby estates have also undertaken their own planning with knowledge of the expected location, scale and composition of the centre f) Development of the centre to the scale proposed is appropriate as it is intended to serve significant greenfield population growth. g) The centre will not trigger dis-benefit to other nearby commercial centres e.g. Ocean Grove Marketplace which is already at capacity. <p>The submission also considers the drafting of Clauses 21.19 & 22.03, particularly regarding assessment of applications, to be extensive and unduly onerous. The 'high impact' v 'low impact' assessment pathways are unwarranted when assessing various forms of proposed activity centres.</p>	<p>Do not agree.</p> <p>Kingston Downs NAC shop floorspace cap to remain.</p>

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12	Scentre Group for the owners of Westfield Geelong	<p>Makes submissions to the proposed amendment provisions:</p> <p><u>Clause 21.19 Activity Centres</u> Continues to support this clause which reinforces the primacy of Central Geelong as the focus of retail and cultural activity in the region. Supports the criteria and restrictions on the development of new retail centres, and the introduction of guidelines for supportable additional floorspace. Requests that:</p> <ul style="list-style-type: none"> ▪ Under 'Retail Hierarchy' within 21.19-2 second dot point, delete the preamble '<i>where a permit is required for use</i>'... ▪ Under 'Retail Hierarchy' within 21.19-2 third dot point, queries the omission of centre expansion being 'discouraged' where the economic impact to nearby centres exceeds 10%. ▪ Under 'Commercial and industrial land' within 21.19-2, queries whether this will lead to the ad hoc establishment of new supermarket based centres that will undermine the Retail Hierarchy. ▪ Under 'Preferred Location' within 21.19-2, suggests that a minimum distance of 800m walking distance to residential zoned land is more appropriate (not 400m). <p><u>Clause 22.03 Assessment Criteria for Retail Planning Applications</u></p> <ul style="list-style-type: none"> ▪ Under 'Policy Basis' queries encouraging the provision of 'supermarket based centres' within a 400m distance of residential zoned land. Suggests the distance be a minimum of 800m. ▪ Under the 'Policy' section, queries whether the term 'Use applications' should be replaced with 'Use and buildings and works applications'. This will allow for a determination of whether buildings & works is 'low' or 'high' impact. ▪ The determination as to whether a proposal is 'low' or 'high' impact should also be based on: (1) whether the total floor space demand until 2036 (CI 21.19 Table 1) will be exceeded; and (2) whether the proposal will impact on the timing, delivery and viability of other retail centres. <p><u>Amended Schedule to Commercial 1 Zone</u> Submits that should the changes to the schedule be adopted, that further policy emphasis is placed on the '<i>Supportable Retail Floor Space Guidelines to 2036</i>' (CI 21.19 Table 1) to ensure expansion of existing centres does not exceed the anticipated floor space demand.</p>	Agree in part.
13	E & M Perez, owners of 92 Melaluka Rd Leopold which is the land designated as Stage 2 of the Leopold	The submission confirms support for the Retail Strategy directing expansion of the Leopold Sub-Regional Activity Centre north along Melaluka Road.	Noted.

No	Submitter	Summary of Submission	Officer Response
	Sub-Regional Activity Centre		
14	Tract for the McCann Family (landowner within the Western Geelong Growth Area)	<p>The submission is supportive in principle of the Retail Strategy and the Amendment however raises some concerns. Concerns relate to:</p> <ul style="list-style-type: none"> ▪ The Retail Strategy population growth rate being lower than the rate used for the Settlement Strategy and NWGGA Framework Plan. ▪ Location of centres at Clause 21.19-5 do not correlate with the locations in the NWGGA Framework Plan. ▪ No commentary of the Specialised Activity Centre identified in the NWGGA Framework Plan. ▪ Clause 21.19-2 Table 1 does not does incorporate the planned new centres in the NWGGA Framework Plan. ▪ The proposed C1Z Schedule does not include reference to the planned new centres in the NWGGA Framework Plan. ▪ There are inconsistencies in the terminology used to describe the various activity centres throughout Geelong as well as the future planned growth area. <p>The submission requests the following:</p> <ol style="list-style-type: none"> 1. Revise maps to ensure location consistencies with the NWGGA Framework Plan. 2. Reconsider the content and recommendations of the Strategy based on the Settlement Strategy and NWGGA population growth rate. 3. Identify the future planned Specialised Activity Centre in the Western Growth Area. 4. Ensure activity centre description consistency in the Retail Strategy and Amendment documentation. 	Agree except for reconsidering the Retail Strategy population growth rate.

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