MATTERS RAISED IN SUBMISSION	COMMENT
INFRASTRUCTURE	
Lack of infrastructure to support local businesses • Poor roads and traffic management effecting efficient access for local residents	Comments are noted. Council is developing transport management plans for the local centres in collaboration with Transport for NSW. These plans seek to identify locations where access and capacity improvements are required, and are the subject of ongoing discussions with Transport for NSW.
Parking • Greatest issue is public parking, council car parks have not increased spaces, meaning people are more reluctant to attend local shops.	Surveys undertaken for Council in the 4 key local centres (Turramurra, St Ives, Lindfield and Gordon) indicate that there is spare public parking capacity in those centres, with the exception of St Ives Shopping Village (prior to the introduction of paid parking). Council has recognised that the implementation of paid parking (in its car parks in local centres) is a future parking management tool that will assist in increasing the turnover of parking spaces, which will improve access to parking spaces for people that need to drive to shops in those local centres. Furthermore, new or expanded retail developments will generally be required to provide parking in accordance with the Ku-ring-gai DCP
TRAFFIC	
Access from cross streets to major roads Memorial Ave &Cowan Rd to Mona Vale Rd Too many pedestrian crossings and traffic lights close together	Council has developed a transport management plan for the St Ives local centre in collaboration with Transport for NSW. These plans identify locations where access and capacity improvements are planned, and are the subject of ongoing discussions with Transport for NSW, who authorise/approve new traffic signals and pedestrian crossings. Pedestrian crossings are important as they better connect residents, shops and bus stops on both sides of Mona Vale Road, and reduce severance.
	The intersection of Mona Vale Road and Memorial Avenue/Rosedale Road is planned to be improved, with an additional from Memorial Avenue into Mona Vale Road, and potentially a new traffic signal-controlled intersection on Mona Vale Road outside St Ives Shopping Village (roughly near Denley Lane). This will reduce pressure on the intersection of Mona Vale Road and Cowan Road.
Lack of suitable employment close to home, leads to traffic and congestion.	A significant proportion of Ku-ring-gai residents travel outside the LGA for work, and Council is working with Transport for NSW in the implementation of Future Transport 2056 and the Greater Sydney Services and Infrastructure Plan. These strategies set the 40 year vision, directions and outcomes framework for travel in Sydney. Key planned transport improvements that will benefit Ku-ring-gai residents working outside the LGA include Mona Vale-Macquarie Park bus improvements, Dee Why-Chatswood (via Frenchs Forest) bus improvements, NorthConnex and the implementation of the Principal Bicycle Network.

MATTERS RAISED IN SUBMISSION	COMMENT
PYMBLE BUSINESS PARK	
Access	Comments noted.
 Unsafe access to PBP and surrounding residential area. A pedestrian crossing needed at A1 or A3 interchange (particularly for when Bunnings opens). 	The draft strategy acknowledges the challenges facing Pymble Business Park, including the connectivity and access issues for both vehicles and pedestrians, particularly to public transport.
Challenges and Opportunities • SWOT Analysis should be undertaken	Pymble Business Park currently accommodates a range of land uses including freight, logistics, office, warehousing and local light industry, and a Bunnings Warehouse is currently under construction.
 Challenges - Topography, disconnected public transport options and lack of a distinct character and purpose. 	It is acknowledged within the draft strategy that transport connectivity is a barrier to the optimal utilisation of this area, as is adjoining biodiversity significant lands and contamination.
 New Bunnings store – major bulky goods anchor – mixed use precinct to cater for forecast demand and undersupply of large format retail in LGA. Support recommendation for a detailed study of option 2 allow specialised retail premises and option 3 allow mixed use development. Support study to allow specialised retail, or mixed-use residential 	The North District Plan directs that urban services land within the North District should be 'retained and managed', and this direction will need to be considered as part of the recommendation for a further detail study to be undertaken specifically investigating Pymble Business Park, and examining its future role, function and land use, alongside urban planning, traffic management and economic impact assessment.
NIGHT TIME ECONOMY	
 Lack of consideration of night time economy with no analysis of items such as pubs. Support entertainment facilities in Primary Centres to create night-time economy Currently no night time economy 	Comments noted and reflected in the draft strategy. The draft strategy notes that Ku-ring-gai has limited entertainment facilities, which is possibly due to the lack of larger shopping centres that usually house these facilities. The draft strategy includes a recommendation to 'Encourage entertainment facilities in the centres higher up the hierarchy (such as Gordon and St Ives) to create a night time economy.' The draft strategy is a bread, high level document, to be used as a tool to guide future planning.
	The draft strategy is a broad, high level document, to be used as a tool to guide future planning decisions. It was not a detailed investigation into the night time economy of Ku-ring-gai. The draft strategy does reference the principles in the Ku-ring-gai LSPS and Community Strategic

MATTERS RAISED IN SUBMISSION	COMMENT
	Plan which support a diverse night time economy improving centres to provide night time activities, and includes a recommendation seeking to help improve/create a night time economy.
 Community Halls Demand of community halls for club use. Demand to accommodate 50-100+ and 	Comments are noted. The draft strategy includes a guiding principle, which recommends that council 'provide the appropriate infrastructure, streetscape amenity and security to ensure that these centres are sustainable.'
space to provide service food and beverage. Halls need to be distributed throughout LGA e.g. for use as private function facilities.	Council is in the process on undertaking a Community Facilities Strategy in four (4) parts relating to 1 – Community Centres and Libraries, 2 – Arts and Creative Spaces, 3 – Community Services and 4 – Management Model, and this strategy gives specific detailed consideration of the demand for community facilities such as community halls, and the appropriate locations for these.
Ku-ring-gai Neighbourhood Centre	Comments are noted.
Current location has good visibility (to make it known) and access for residents, particularly the elderly. Operation out of a different location would reduce pedestrian traffic, lower visibility and access may be impeded. Any relocation would need the key attributes of the present location.	The draft strategy does not have any impact or influence on the location of particular retailers/organisations (including Council owned) shopfronts within the St Ives Shopping Village Centre. This is a matter for retailer/organisations/Council and the SISV in future planning.
Strategy makes no mention of the scale of community facilities in St Ives – need for larger library and other community facilities	The draft strategy acknowledges that the centres within Ku-ring-gai provide retail, commercial, services as well as community facilities for residents, and notes the future role of St Ives will include 'and community facilities creates a lively place for residents and visitors to meet, live and socialise'. The Ku-ring-gai Community Facilities Strategy adopted by Council in 2018 identifies future floor space requirements for community facilities in St Ives.
Order of focus	The draft strategy recommends prioritising unlocking major development of the Gordon Centre
Lindfield is improved, next should be Turramurra then St Ives and Gordon.	and St Ives Shopping Centre. The draft strategy also provides recommendations for retail floorspace for the Primary Local Centres of Lindfield, Turramurra, St Ives and Gordon from 2019-2036.
Land for retail and commercial purposes is overvalued	Council has had recent market and economic feasibility analysis undertaken for each of the four centres. Commercial properties within the centres, and particularly Gordon have a very high land values. In general the higher the land value per sqm the higher the FSR required to reach the 'tipping-point' for developments to become feasible.

MATTERS RAISED IN SUBMISSION	COMMENT
Market forces should be allowed to work so that land values depreciate in real terms and redevelopments make sense commercially – not artificially propping up commercial and retail usage with housing	The draft strategy outlines that facilitating and promoting new retail and commercial opportunities as part of mixed-use developments within the centres will catalyse the revitalisation and redevelopment of the centres whilst maintaining an appropriate mix of retail and commercial floorspace. The draft strategy outlines that mixed use will also enable developers to overcome high costs of land consolidation and development constraints, provided there is sufficient scale to subsidize asset classes that have poor returns.
	Council's adopted <i>Housing Strategy to 2036</i> proposes no changes to existing planning controls including no increases in height and FSR. This will limit the feasibility of future redevelopment within the centres.
 Killara and Lindfield Community is growing, area needs to suit this - upgrade and add retail. Shops and cafes for residents near Beaumont Rd. West of Pacific Highway need retail for local families. Shops on Pacific Highway at Killara to suit needs of young families and downsizing older generation. New bus routes to connect Station with Greengate, and shopping areas and higher density living, with train stations. Vacant shops near Fiddens Wharf Rd. Hub and pedestrian bridge more desirable for retail and commercial. 	Comments are noted and reflected in the draft strategy. The draft strategy outlines that Ku-ringgai is currently estimated to be undersupplied by approximately 35,000sqm of retail floorspace, and could potentially increase to 43,000sqm shortfall by 2036 dependent on projected population increase. The draft strategy includes a specific recommendation for the Killara centre 'improve the attractiveness of the retail offering and address the issue of accessibility'. The draft strategy includes a recommendation for neighbourhood centres such as West Lindfield, 'to maintain the retail supply, seek to improve the quality and accessibility'. The Ku-ring-gai LSPS includes an action to advocate to TfNSW for improvements to access to public infrastructure, comprising of more frequent and direct bus services to stations, improvement to key local bus corridors and introduction of on-demand bus services.
 St Ives Village Shopping Centre Upgrade and developed as a cohesive whole. New entertainment options (cinemas and improved dining and alfresco). Support mixed housing above centre. 	The comments from submissions supporting the upgrade and redevelopment of the St Ives Shopping Village are noted. The comments supporting the additional of entertainment options, such as cinemas and improved dining and alfresco are noted and reflected in the draft strategy, which includes a specific recommendation to provide entertainment facilities. The draft strategy also notes that it is most likely that a cinema complex would be suitable at Gordon or St Ives, given these are the most high profile locations, have the largest provision of existing facilities and the highest trading locations in the LGA.

MATTERS RAISED IN SUBMISSION

- Better integration of community facilities with shopping centre and adjacent green space. Layout.
- Enhance movement of people from the park and surrounds to shopping centre.
- Support extension of Village onto green area.
- Facilitate large format retail stores.
- Community centre with art gallery hanging space.
- · Opportunities to live and work in the centre.
- Achieved though comprehensive redevelopment of jointly owned sites.
- Council should signal its intention to prepare a Planning Proposal for the SISV site.
- Council needs to reclassify landholdings surrounding SISV to enable its integration into masterplan. Current 'community land' classification inappropriate.
- Commercial viability of redevelopment dependent on residential.
- Provision of housing should be limited to minimum necessary to make development viable
- Community facilities should be adjacent to but separate from SISV.
- Retain village character.
- Shared office spaces to work closer to home.
- Village Green outdoor are for restaurants and cafes.
- Specialised retail should be a permitted land use for SISV site to provide added flexibility

COMMENT

The comments supporting mixed use development, and the requirement for residential development to enable commercial feasibility are noted and reflected in the draft strategy. The draft strategy includes a recommendation 1. Promote mixed use developments in the centres, whilst mandating minimum levels of commercial and retail.

The submission requesting Council prepared a Planning Proposal for the SISV site, and reclassify council landholdings surrounding the SISV site is noted. Private landholders, such as the SISV are able to submit a private planning proposal to Council at any time, including a planning proposal seeking the reclassification of public land.

The comments supporting larger format retail stores are noted and reflected in the draft strategy, which outlines that discount department stores and other large major or mini-majors that are normally present in larger shopping centres should be encouraged in Gordon and St Ives.

The comments seeking to retain the village character are noted, and are consistent with the Planning Priorities and actions contained in the Ku-ring-gai LSPS.

The comments regarding the layout, integration, location and type of community facilities as well as pedestrian access to village green are noted. These are specific detailed components that are best determined through a master planning process of the precinct or development proposal for the centre. The draft retail and commercial centres strategy is more of a high level strategic document for the whole of Ku-ring-gai, rather than a detailed investigation into the redevelopment of the SISV.

The comments regarding shared office spaces to work close to home are noted, and reflected in the draft strategy which notes that agile working, work from home and co-working are new work trends which may influence the future of commercial land. The draft strategy also notes, that those working from home may require touchdown/co-working spaces when they want the option of working from an office. Agile and co-working workspaces require updated technology and amenities, more flexible offices and an increase in shared spaces.

The draft strategy does not identify or recommend 'specialised retail' (bulky goods) for St Ives. The draft strategy includes a recommendation that a further detailed study be undertaken for Pymble Business Park to investigate potential options for future land uses, including 'specialised retail'.

MATTERS RAISED IN SUBMISSION	COMMENT
St Ives – Stanley Street	Comments are noted.
Redevelopment of strip shopping on Mona Vale Road between Stanley Street and Old School Building (including shop top housing) should be undertaken at same time as SISV redevelopment – improve overall amenity of St Ives.	The timing of any redevelopment would be subject to the land owners, and is not something that Council can direct.
Turramurra	The comments supporting the Turramurra Community Hub are noted.
 Support Turramurra Hub Has potential to have terrific shopping precinct Support growth and revitalisation of Turramurra Local Centre Gilroy carpark, Uniting Church site and 	The comments supporting the revitalisation and growth of Turramurra Local Centre to create a family focused urban village are noted and reflected in the draft strategy through the specific recommendations and actions for Turramurra, which include: Recommendations: - Improvement to the attractiveness of the retail offering
Rohini Street Shops – LSPS identifies site for future renewal. Encourage adoption of planning controls to reflect this. Support family focused urban village,	- Address the issues of deteriorating quality and escape expenditure - Attract new retailers with diversified offerings to capture escape expenditure Actions:
 redevelopment to Council owned sites Post office in Turramurra to replace the one which closed. Turramurra to have at minimum same controls as Lindfield local centre 3:1 FSR 	 Provide orientation of mixed use towards Turramurra Hub and away from the highway Investigate opportunity for Council owned land in Gilroy lane in conjunction with adjoining land owners to deliver a new and revitalised retail precinct Council to invest in infrastructure, streetscape, security and amenity
 and 26.5 (9 storey) height. Council consider waiver of contributions for development that provides significant community facilities such as the Turramurra Community Hub. New Turramurra retail supply sqm not ambitious enough – additional floorspace required to deliver vibrant and activated mixed use precinct. 	The draft strategy includes a recommendation <i>4. Provide incentives for investment</i> , which outlines that development and capital expenditure on retail and commercial facilities is considered to be financially unviable, and as a way to overcome this, Council could consider incentives such as waivers for development contributions and other 'costs' as financial incentives, Council capital investment and expenditure programs for infrastructure, beautification, amenity and security, as well as non-financial incentives such as marketing campaigns, and council engagement with local businesses. The provision of a post office in the Turramurra Local Centre is a matter for Australia Post to determine.

MATTERS RAISED IN SUBMISSION	COMMENT
	The comments regarding suggestion of planning controls for the Gilroy Lane precinct and Turramurra Hub are noted. The draft strategy includes a recommendation to 2. Investigate increases in FSR and Building Heights within the B2 Local Centres zone.
	The retail supply for Turramurra indicated in the draft strategy is based on projected population growth, and represents the additional floorspace that is supportable in conjunction with growth in other centres.
No substantial investment in Gordon in over 20 years. If status quo remains — deterioration in quality of retail services and reduced amenity — must be avoided. Better entertainment facilities, better alfresco dining and recreation space, better linkages to station, opportunities to live and work in the Centre, better community facilities (community centre), shared office spaces) Support enhancing and improving No not wish to see Gordon become size and scale of Macquarie or Chatswood Chase — but it desperately needs improvement.	Comments outlining the potential deteriorating of retail services and amenity if the status quo remains, and comments supporting the enhancement and improvement of Gordon are noted and reflected in the draft strategy. The draft strategy outlines that if the status quo remains it will likely result in:
	 Deteriorating commercial and retail assets Higher vacancies that the current already high baseline Vacant and run down buildings Increase in escape expenditure Reduction of jobs in LGA
	The draft strategy includes a recommendation that prioritises unlocking major developments of Gordon Centre and St Ives Centre. The draft strategy notes that as the major centre in the centre hierarchy of Ku-ring-gai, Gordon should be positioned to have the ability to service the population with high quality accessibility and high levels of amenity.
	In terms of better alfresco dining, in early 2021 Council will be undertaking streetscape upgrades to St Johns Avenue, Gordon. The upgrade will include wider footpaths, outdoor dining, new pavements, new street furniture and tree planting.
	The Public Domain Plans which are currently being reviewed by Council set out improved linkages and through block links to enable access to and around the centre and the station.
	The draft strategy includes the following recommendations and actions, specific to Gordon:
	Recommendations:
	 Provide higher order retail facilities that decrease escape expenditure Improve the quality of retail offering Address future retail undersupply by providing additional supply Improvements to the attractiveness of the centre

MATTERS RAISED IN SUBMISSION	COMMENT
	Actions
	 Provide outdoor dining opportunities, particularly in St Johns Avenue with removal of car parking and widened footpaths Provide alternative street frontages to the highway to recreate a destination precinct Invest in infrastructure and streetscape, security and amenity Encourage growth and expansion of retail and commercial uses within the centre, as well as development and renewal to activate the centre.
New facilities	The draft strategy includes the following recommendation in relation to the provision of entertainment facilities:
Trampoline parkRock climbing, indoor play centre, bowling	6. Encourage entertainment facilities in the centres higher up in the hierarchy to create a night-time economy.
 Rock climbing, indoor play centre, bowling New cinemas in Ku-ring-gai are not needed because of screens in Chatswood and Macquarie Park – other forms of entertainment should be included There is a strong demand for cinemas to broaden entertainment, food and beverage and leisure options. 	The provision of entertainment facilities in the Ku-ring-gai LGA will address the amount of resident cinema and entertainment spend currently escaping to other larger regional shopping centres.
	With regards to cinemas, the draft strategy acknowledges the cinema provision at Roseville Chase, and cinema provision at Macquarie, Chatswood and Hornsby. Based on the NSW/ACT benchmark of 8.3 screens per 100,000 residents, there is a demand for nine screens within Kuring-gai, indicating a current undersupply of seven screens.
Lack of existing facilities – have to travel beyond north shore for indoor play centres, playgrounds and other fun attractions for kids	Comments are noted and reflected in the draft strategy, which includes the following recommendations: • Entertainment uses such as a new multi-screen cinema complex and other shopping centre type entertainment uses should be encouraged in Gordon and St Ives, and to a lesser degree Lindfield and Turramurra
	Peripheral entertainment and leisure uses such as a trampoline park, rock climbing, kids soft play etc. over time are to be encouraged in areas that large floorplates can be secured, most likely at the Pymble Business Park
 Underinvestment in commercial and retail space is solely due to out-dated planning controls and zoning contained in the LEP. Existing development controls in Turramurra (Hub) are not commercially viable and warrant review. 	Comments noted and reflected in the analysis contained within the draft strategy. The draft strategy notes:
	FSR and Building Height planning controls vary within the centres from 1:1 to 3:1, and from 9.5m to 26.5m, within the B2 Local Centre zones. Certain areas of the local centres still have very low FSRs and are not conducive to any redevelopment. Additional heights may facilitate the quantum of residential as shop top housing to meet housing targets but will also increase the potential viability of development.

MATTERS RAISED IN SUBMISSION	COMMENT
 FSR controls in centres are not conductive to redevelopment – limiting further expansion of retail and commercial uses 	The draft strategy includes a recommendation to Investigate increases in FSR and Building Heights within the B2 Local Centre zones.
Support mixed use development but avoid having overly prescriptive controls such as arbitrary FS caps. Question proposed mandating of minimum levels of commercial and retail floor space works against recommendation to provide flexible approach	The draft strategy includes a recommendation 1. Promote mixed use developments in the centre whilst mandating minimum levels of commercial and retail. The mandating of minimum levels of commercial and retail floorspace ensures that the existing quantum of commercial and retail floorspace is not changed into other uses, like residential, when transitioning to mixed use. As residential is the highest and best use, this means if minimums are not set then it is likely that developers will substitute the existing retail and commercial floorspace for residential. The draft strategy includes a recommendation 2. Investigate increases in FSR and Building
Height and Floorspace	Heights within the B2 Local Centres zone
 Support for investigation into increases in FSR and heights in B2 zones. Council needs to review provisions in LEP to address any planning controls that are obstructing implementation of strategy 	
General	The draft strategy includes a recommendation 3. Provide a flexible approach to planning
 Support - flexible approach to planning controls, provide incentives and investment, facilitate improvement of retail offering Incentives to encourage site amalgamation, and redevelopment with public benefits (through site links, community spaces and public art). Review incentives to encourage investment in retail and commercial centres. Recommend that waivers/offsets for contributions be permitted where developments provide significant community facilities, services and public open space. 	controls. The draft strategy includes a recommendation 4. Provide incentives for investment, and outlines this could include marketing campaigns, waivers for development contributions and other costs, council capital investment and expenditure programmes for infrastructure, beautification, amenity and security, and engaging with local businesses.

MATTERS RAISED IN SUBMISSION	COMMENT
 Gordon Review of planning controls needed to make Gordon thriving mixed use centre 	The draft strategy includes specific recommendations for Gordon, which include providing higher order retail facilities, improving the retail offering, provide additional retail supply and improve the attractiveness of the centre.
New controls for SISV – should be strictly controlled and limited so that primary purpose is shopping centre with community facilities. Separate FSR and height controls	Comments are noted. The draft strategy does not make any specific recommendations on heights or floor space, or how this should reflected on sites such as the SISV.
should be applied to different uses (e.g. shopping complex vs strip retail with shop top housing). St Ives	Comments are noted. The draft strategy does not make any recommendations on specific heights.
 Shop top housing along Mona Vale Road should be limited to 4 storeys in height. 	
 Recommend Council investigate options for defining 'supermarket' as a specific land use. Currently supermarkets are defined as 'shop', which is a type of 'retail premises'. Need to provide clear standalone definition. Supermarket is more closely aligned to a 'specialised retail premises' – due to the needs for large area for handling, display, storage and direct vehicle access. Recommend Council consider inclusion of specific local provision in Part 6 of LEP to permit supermarkets in the B7 Business Park zone. Include definition, development standards. Allow council to consider supermarket as a distinct from shop or retail premises. 	Comments are noted. Land use definitions are included in the Standard Instrument LEP dictionary, and in order to maintain consistency in planning language across the state, Councils are not able to alter the standard definitions or directly add definitions. The suggestion for a clear and standalone supermarket definition should be directed to the Department of Planning, Industry and Environment for review and amendment to the Standard Instrument LEP. The only B7 Business Park zone within Ku-ring-gai is the Pymble Business Park. The draft strategy recommends that a further detailed study be undertaken for the Business Park to examine its future role, function and land use alongside urban planning, traffic management and economic impact assessments. This recommendation is also supported by the Ku-ring-gai LSPS, which also includes an Action to undertake an investigation of Pymble Business Park to consider the current and future strategic role.

MATTERS RAISED IN SUBMISSION	COMMENT
 Desperate shortage of suitable retail and commercial spaces across LGA – results in severe environmental, social and economic costs to community – impacts on traffic congestion and higher greenhouse gas emissions. Residents must leave LGA for basic necessities – no department stores or large format retail outlets Shopping facilities in Ku-ring-gai are awful 	Comments noted and reflected in the draft strategy. The draft strategy notes that there is an existing undersupply of 35,000sqm of retail floorspace and potentially this undersupply increasing to 58,000sqm with projected population increases to 2036. This growing undersupply of retail floorspace is mainly due to the undersupply of supermarkets, and lack of regional and sub-regional shopping centres in the LGA, thus residents leaving the area to shop in neighbouring centres for their higher-order shopping needs.
Currently underserviced with grocery outlets. Provision of more full line supermarkets would assist in retention of escape expenditure	The existing provision of supermarket floorspace is lower than the metropolitan Sydney and Australian benchmark. One full-line supermarket typically requires a catchment population of 8,000 – 10,000 persons in order to be sustainable. This indicates that 13 full-line supermarkets are currently supportable in the LGA, increasing to 15 supermarkets by 2036. Currently there are ten supermarkets provided which suggests there is capacity for more in the LGA.
 Welcome Council taking more activist approach to place making, investing in civic improvements, incentives for business attraction – long overdue Seems to be reluctance to commit to doing something about proceeding. Council should concentrate on making it more desirable for people to shop and work locally in Centres by providing appropriate infrastructure e.g. parks, pedestrian bridge and Hubs (Turramurra and Lindfield) – this will make it more likely that retailers will set up businesses and rejuvenate properties. 	Comments noted. The draft strategy sets out a number of both planning recommendations, and non-planning recommendations having regard to the key issues facing Ku-ring-gai, and to assist Council in the revitalisation of centres and provide opportunities to meet the community's retail, services and recreation needs. Some of the of the recommendations outlined in the draft strategy include: 5. Facilitate the improvement of retail offering through providing amenity, security and more attractive streetscapes; and 4. Provide incentives for investment through Council capital investment and expenditure programmes for development, infrastructure, beautification, amenity and security.
No account has included the Covid 19 environment and need to look at strategies for the post covid environment:	The draft strategy has included a high level consideration of the Covid-19 effect on retail market and commercial trends. As the pandemic is ongoing, and lack of data, it is currently difficult to predict the longer term consequences on retail and commercial markets. One of the recommendations is for the continuous monitoring and review of the strategy.

MATTERS RAISED IN SUBMISSION	COMMENT
 Include provisions for people protection (ability to socialise by have social distancing) and reduce exposure People over 65 and those with medical issues encouraged to avoid high density areas Population estimates provided are too high given lack of immigration and economic consequences of Covid. 	With regards to population projections, the draft strategy has used the population projections from the NSW Department of Planning, Industry and Environment released in 2016, and a comparison of the population projections released in 2019 (after the modelling had already been completed for the strategy). The Department has not released any official projections which consider the impacts of Covid. The draft strategy does outline that population projections for 20years into the future may not always be accurate due to unknown circumstances and events that could drive population change, and Council must be cognisant of these influencing factors and regularly evaluate the quantity as well as the quality of the supply of retail and commercial land in the LGA.
COVID – Impact on Retail and Commercial	The draft strategy noted that the covid crisis has started to reshape the retail and commercial
 Working remotely and shopping online becoming norm – shift in work habits will mean businesses will require less work space, and Council will be required to look at how this space can be utilised effectively 	landscapes. Areas of retail have experienced a greater shift into e-commerce and may result some retailers rethinking their physical assets, leading to smaller store footprints. It is also possible that commercial office tenants will re-examine the cost and productivity benefits of having staff work from home, and it is likely that companies will capitalise on the reduced overheads and continue this trend.
Due to impacts of COVID-19, development of vibrant mixed use precincts will be underpinned by residential development	The draft strategy recommends the promotion of mixed use development in the centres, which will enable developers to overcome the high costs of land consolidation and development constraints.
 Strategy does not consider/incorporate greening and sustainability – recommended by UN Strategy is based on historical retail trends – which no longer apply – should use new tools and metrics 	The draft strategy specifically provides an analysis of the existing retail and commercial centres, current and future market trends, land use patterns, and population growth and change. The findings of the draft strategy will feed into the broader strategic framework of the Ku-ring-gai Local Strategic Planning Statement, which sets the comprehensive and holistic framework as to how Ku-ring-gai will respond to the challenges of land use planning into the future – including sustainability, canopy cover, green grid and protection of biodiversity.
	The Draft Retail and Commercial Centres Strategy has not just considered historical retail trends. The draft strategy has been prepared utilising ABS census data, on ground survey of centres and floorspace, estimate retail expenditure and retail sales (sourced from Market Data Systems), analysis of recent market activity including sales and development approvals and stakeholder engagement with key stakeholders in the centres.
 Table 9.4 only identifies retail supply opportunities for 'major tenants' – more emphasis needs to be made on identifying 	Comments noted and agreed. Table 9.4 to be amended in draft strategy to acknowledge the role of a broader range of small retailing formats to provide services to the local community and

MATTERS RAISED IN SUBMISSION	COMMENT
broader range of smaller tenancies such as restaurants and other complimentary uses such as gyms, medical centres, holistic wellness and community facilities	support larger format forms of retail. However, this in itself will not stimulate development, it only provides for diversity of tenants once development is feasible.
 Recommend Council consider opportunities identified in the LSPS Structure Plans for Gordon, Turramurra, St Ives and Lindfield in conjunction with recommendation of this strategy 	Comments noted. The findings and recommendations of the Draft Retail and Commercial Centres Strategy will be incorporated into future reviews of the Ku-ring-gai Local Strategic Planning Statement.
Retail Strategy & Housing Strategy	Comments are noted. Council on 22 September 2020 resolved to adopt Housing Strategy,
Housing Strategy is not proceeding with any increased height or now zonings — maintain.	subject to amendments which reflect the provision of new dwellings to 2036 from capacity within existing planning instruments.
 increased height or new zonings – maintain status quo. Need to amend Retail Strategy to reflect Councils decision on Housing Strategy. Retail Strategy cannot be used as backdoor way to overcome limitations of Housing Strategy. Retail Strategy recommends mixed use development to enable developers to overcome high land costs, consolidation and development constraints – this won't be permitted under Housing Strategy. Inconsistency in policy setting between Housing Strategy and Retail Strategy. Housing Strategy seeks to prevent implementation of Retail Strategy by pushing out housing in St Ives centre more than 10years. Revitalisation of SISV cannot be achieved without including housing. 	Report to Council on draft Retail and Commercial centres Strategy at OMC 8 December 2020 is a report on the public exhibition and the submissions received.
	The draft strategy recommends that mixed use development be promoted in the centres, while mandating minimum levels of commercial and retail floorspace. The strategy notes that mixed use will catalyse the revitalisation of the centres, and enable developers to overcome the high costs of land consolidation. As per the adopted Housing Strategy, the only mixed use developments will be from capacity within existing planning instruments.
	The Ku-ring-gai LSPS outlines that the provision of additional housing in St Ives local centre is subject to provision of priority bus infrastructure from Mona Vale to Macquarie Park, which is consistent with the directions of the North District Plan which outline that housing should be provided in locations with access to high frequency public transport, supporting the principle of the 30min city.
	The draft retail and commercial centres strategy includes a recommendation to prioritise unlocking of major developments of Gordon Centre and St Ives Shopping Centre, as 'St Ives is identified to have the least development constraints as it is not intersected by the Pacific Highway, and as such additional retail facilities can be more easily accommodated in the centre'.

MATTERS RAISED IN SUBMISSION	COMMENT
Support and endorsement for recommendations: 1 - Promotion of mixed-use developments in the centres whilst mandating minimum levels of commercial and retail 2 - Investigate increases in FSR and Building Heights within the B2 Local Centre Zones 3 - Provide flexible approach to planning controls 4 - Provide incentives for investment 5 - Facilitate the improvement of the retail offering 6 - Encourage entertainment facilities in the centres higher up in the hierarchy to create night time economy 7 - Priorities unlocking major developments of Gordon Centre and St Ives Shopping Centre 8 - Prioritise a study on Pymble Business Park to update or rezone the Business Park to allow for specialised retail or mixed use residential development to occur.	Comments supporting and endorsing the recommendations outlined in the strategy are noted.
Support for Key Recommendations for each Centre:	Comments supporting the specific recommendations outlined in the strategy for individual local centres are noted.

MATTERS RAISED IN SUBMISSION	COMMENT
 3 recommendations for Turramurra supported 3 recommendations for Pymble Business Park – supported 	
 Support designation of Turramurra as Primary Local Centre Support for designation of St Ives as Primary Local Centre. 	Comments supporting the designation of Turramurra and St Ives as primary local centres are noted.