



COMMERCIAL CENTRES STRATEGY

REVIEW OF MERIMBULA, PAMBULA, TURA BEACH
CATCHMENT

September 2017

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A Objectives

Bega Valley Shire Council are preparing an amendment to the existing Commercial Centres Strategy 2006 to provide strategic direction for the Merimbula/ Pambula/ Tura Beach catchment and to inform future Council decision-making in relation to relevant development proposals.

The aim of this project is to assess the availability of commercial land within the Merimbula/ Pambula/ Tura Beach precinct that is suitable for larger scale retail, bulky goods premises and a mix of business and warehouse uses and to review the role of Tura Beach within precinct to identify any potential land for future B5 Business Development zoning within close proximity to the commercial centres.

This project will further define the current and future commercial functions of Merimbula, Pambula and Tura Beach having regard to the visions and objectives of the South East Regional Strategy 2017 and aims to identify:

- Changes within the catchment which differs from the Commercial Centres Strategy 2006
- Current demand for commercial land within the catchment suitable for bulky goods retail type development
- Available existing commercial land within the catchment
- Potential land for future B5 Business Development zoning within the catchment

The main objective of this project is to create prosperous commercial centres that are livable, connected, innovative, sustainable, accessible, resilient, efficient, unique and diverse by protecting our natural advantage by providing a clear vision for the development of the Merimbula/ Pambula/ Tura Beach catchment. We have an opportunity to ensure that our places retain everything that we love about them, their character, landscape and unique features by adopting a 'smart growth' philosophy.

This project will result in a strategic review of this catchment in light of the complete review of the Commercial Centres Strategy 2006 that will commence in 2018.



B Introduction

B.1 Background

As part of the Draft Bega Valley LEP 2010 (Draft BV LEP 2010) process, Council proposed to zone the site on the corner of Sapphire Coast Drive and Tura Beach Drive R2 Low Density Residential (site identified in *Section E.3.1* as Area 1).

A submission was received during exhibition requesting the consideration of R3 Medium Density Residential zone, which was supported by Council. Council later received a submission further requesting a B5 Business Development zone. Council resolved at the meeting of 12 February 2014 to proceed with a Planning Proposal to rezone Area 1 to B5 Business Development zone.

A Gateway Determination was issued and determined that the Planning Proposal should not proceed on the basis that it did not adequately consider the Local and Regional Planning Strategies nor were the potential impacts of a B5 zoning in this location assessed or justified.

A Planning Proposal was subsequently lodged in February 2016 requesting the rezoning to a B5 Business Development zone and accompanied by a comprehensive economic impact assessment, which was supported by Council.

A Gateway Determination was issued on the 15 August 2016 and determined that the Planning Proposal should not proceed for a number of reasons relating to the inadequate consideration of the Local and Regional Planning Strategies.

A review of the Gateway Determination dated 15 August 2016 was sought by the proponent. On 2 February 2017 the Southern Joint Regional Planning Panel (JRPP) considered the Gateway Review and was of the view that *‘with appropriate limits on use and appropriate measures to mitigate potential impact on neighbouring land uses, a Bunnings store could be accommodated on this site, without significant detrimental impacts on the hierarchy of centres’*.

The Panel was of the view that *‘the underlying zone should be changed to R5 Large Lot Residential, similar to the zoning of lands along the eastern side of Sapphire Coast Drive as a holding zone until such time as Council completes its strategic work to determine whether or not the site should support a greater range of uses’*. The Panel also recommended that Council finalise its strategic work in respect to the location of employment lands and commercial hierarchy to determine the appropriate strategic framework for the site and the function of the Tura Beach centre.

Following the advice received from the Panel, Council sought further clarification from the Department of Planning as to the requirements for the review of the Commercial Centres Strategy 2006. These requirements are outlined in *Section B.2 Project outline*.

In response to the advice from the Department of Planning and the Joint Regional Planning Panel regarding the need for a review of Councils existing Commercial Centres Strategy 2006, Council are preparing to undertake a full review of the strategy in 2018.

In the meantime, Council is undertaking a review of the Merimbula/ Pambula/ Tura Beach precinct in particular, identifying the current functions and future directions of each of these localities in the context of the commercial centres hierarchy within the Shire. This review will replace the Merimbula/ Pambula/ Tura Beach Local Centre chapter in the Commercial Centres Strategy 2006 in the short term until such time that a full commercial centres strategy review is undertaken.

B.2 Project outline

This project will cover the following:

1. A discussion of Tura Beach centre in the context of the South East and Tablelands Regional Plan 2036;
2. Determine the current and preferred future role and function of the Tura Beach centre
3. Identifying how the local and sub-regional activities at Tura Beach fit strategically with projected growth in other centres in the Bega Valley
4. Principles for considering any future commercial proposals of a sub-regional nature for local centre or out-of-centre locations
5. Suitability of land identified for B5 Business Development zoning to accommodate bulky goods warehouse type development and
6. Design considerations for the site, particularly in relation to adjoining land uses and the role of the site as a gateway to the Tura Beach residential area



C Merimbula/ Pambula/ Tura Beach catchment in 2017

Council engaged a consultant to provide specific planning advice regarding the functions and directions of the Merimbula/ Pambula/ Tura Beach commercial precinct in the context of the directions of the South East and Tablelands Regional Plan.

This advice has been guided by correspondence between the Department of Planning & Environment and Bega Valley Shire Council dated 27 June 2017, concerning the review of Council's Commercial Strategy. In particular, this advice responds to the requirement to provide a discussion in the context of the draft South East and Tablelands Regional Plan. In doing so, the relevant directions and actions of key Council and NSW Government strategic documents are identified to provide background. These are the South Coast Regional Strategy, the South East and Tablelands Regional Plan, the Bega Valley Shire Commercial Strategy 2006, the Bega Valley Shire Land Use Planning Strategy 2008 and a report prepared by Hill PDA for the Department of Planning & Environment in 2008.

A copy of advice received from Zenith Town Planning dated 18 September 2017 is attached as an appendix to this report.

C.1 South Coast Regional Strategy

The South Coast Regional Strategy released by the Department of Planning in 2006 contains a table in Chapter 7 Economic development and employment growth that identifies the hierarchy of centres within Shoalhaven, Eurobodalla and Bega Valley LGAs. Centres are classified as either a regional city, major regional centre, major town or village. Bega is listed in the table as a major regional centre, Merimbula as a major town and Pambula as an example of a town. Bega is described in text in the chapter as an emerging regional centre ... which plays ... a key economic role ... which can be further strengthened by the location of new finance, administration, business services and retail jobs within centres. An outcome of the strategy is to concentrate employment growth around existing well-served commercial centres such as Bega.

The key functions of a major regional centre such as Bega are described in the strategy as:

Provide for the majority of growth within the Region. A concentration of medium and high density living, business, employment, professional services, specialised shops and associated warehouses, transport logistics and bulky goods operations. Focal point for subregional road and transport networks.

The key functions of a major town such as Merimbula are described as:

Existing smaller centres identified for a lesser proportion of growth. Provide a shopping and business centre for the district, including warehouses, transport logistics, bulky goods operations, health and professional services, mixed with medium density residential.

The key functions of a town such as Pambula are:

Small centres that vary in size with small-to-medium concentrations of retail, health and other services with lower density residential. Reliant on higher order centres for shopping and employment.

Relevant actions of the South Coast Regional Strategy are to protect and add to employment lands in existing economic centres, including major regional centres and major towns ... and ... mechanisms and controls will be identified to preserve and support the hierarchy of commercial centres.

C.2 Bega Valley Shire Commercial Strategy 2006

The role of Bega as the regional administrative centre providing commercial, retail and public services to Bega Valley Shire and beyond is supported in the Commercial Strategy.

The Commercial Strategy groups Merimbula, Pambula and Tura Beach into a single centre. It's role is to provide weekly service needs for the communities of Tura Beach, Merimbula, Pambula, Pambula Beach and South Pambula plus the rural hinterland. Only limited expansion is seen as being possible or necessary for the Tura Beach and Pambula commercial zones. The theme for this combined commercial centre includes:

- Full district level services to meet weekly shopping requirements
- Tura to remain a local servicing centre
- Pambula to build on its heritage theme as a local service centre but with some bulky goods clusters

In the short term, it is recommended in the strategy that Council support an immediate amendment to the planning scheme to facilitate an extension of the current Tura business zone to the immediate west of up to 4 hectares that would have capacity for up to 6,000m² of commercial floor space plus capacity to accommodate childcare, medical/professional suites and possibly a service station. This rezoning has been implemented.

At the time this strategy was prepared Council envisaged that Tura Beach would remain a small local centre to service the needs of the surrounding residential area.

C.3 Bega Valley Shire Land Use Planning Strategy 2008

This strategy was prepared to inform Bega Valley LEP 2013 and considered the economic role of each settlement in the LGA. Bega is identified as the regional commercial centre and the main target for regional scale industrial and retail growth. Securing bulky goods and major retail developments is identified as a challenge for Bega.

The role of Merimbula, which includes Pambula and Tura, is to provide district retail services with a focus on weekly needs. Tura Beach is seen as having a support role to Merimbula with a proposed expansion of 5,000m² of retail floor space to improve the ability of Tura Beach centre to service local needs and to provide alternative options for homemaker and supermarkets in the Merimbula district. The proposed additional retail capacity has been enacted through the allocation of zone B1 Neighbourhood Centre in Bega Valley LEP 2013.

The future role of Tura Beach has evolved since the Commercial Strategy 2006 to the point where Council has now grouped the three settlements of Tura Beach, Merimbula and Pambula into one commercial precinct with the capacity to offer comparison goods from Tura Beach.

C.4 Review of Bega Valley LEP Draft Amendment No 4 February 2008

This report prepared by Hill PDA Property Consulting has been cited by the Department of Planning & Environment as supporting the primacy of Bega as the regional commercial centre. It was prepared to review an amendment to the previous Bega Valley planning scheme.

It was recommended that a large supermarket could be developed in either Merimbula or Tura Beach without any negative effect on the economic functioning of Bega. However, department stores, including discount stores are best located in Bega, with bulky goods outlets being developed as close to Bega town centre as possible. It is also recommended that limitations be placed on the development of 'out-of-

centre' or homemaker/bulky goods outlets in smaller centres to protect Bega as the regional centre. Examples of such limitations are not provided in the report.

C.5 South East and Tableland Regional Plan 2036

The South East and Tablelands Regional Plan was released by the Department of Planning and Environment in July 2017. The draft version of the Regional Plan contained a direction to strengthen the commercial function of the region's centres. This was accompanied by a table identifying metropolitan cities and regional centres of which Bega is one of the latter. The functions of each were described in the table. Text beneath the table encouraged Councils to identify their centres hierarchy and noted for example that it would be appropriate for major towns such as Merimbula to be recognised for the strong district functions. Action 4.3.1 of the draft plan was to focus commercial and retail activities within the region's centres in line with the regional centres hierarchy.

Neither the regional centres hierarchy table nor Action 4.3.1 were carried forward into the adopted Regional Plan which is now in force. Bega is now defined as a strategic centre being a centre with the largest commercial component of any location in the region that provide a full range of higher-order services, including access to hospitals and tertiary education services.

The role of centres is described in the glossary to the adopted plan as providing jobs and services such as shopping, dining, health and personal services to meet the daily and weekly needs of the local community.

Direction 12 of the Regional Plan is to promote business activities in urban centres. It is stated in the plan that strategic and local centres are to be the focus of more intensive employment uses, however, 'local' centres are undefined and the plan does not identify the hierarchy of centres in the same way as the South Coast Regional Strategy.

Relevant actions of the plan are:

12.3 Reinforce the role and function of centres as the primary places for commerce, retail, social activity and regional services through local strategies and local environmental plans.

12.4 Focus future commercial and retail activity in existing commercial centres, unless there is a demonstrated need and positive social and economic benefits to locate this activity elsewhere.

12.5 Require proposals for new retail development to demonstrate how they:

- Respond to retail supply and demand needs;
- Respond to innovations in the retail sector;
- Maximise the use of existing and planned infrastructure (including public transport and community facilities) commensurate with the scale of the proposal; and
- Enhance the value of the public realm.

Other than reinforcing the role and function of existing centres, these actions do not indicate the primacy of any strategic centre or any other centre, or the preferred hierarchy of centres. The actions appear to ensure that there is flexibility built into the planning system to accommodate new commercial development when it can be demonstrated that there will be community benefits and where it can be justified in economic terms.

C.6 Role and function of Tura Beach centre

Population and household forecasts for settlements within Bega Valley Shire have been prepared by .id. Forecasts for Bega Valley Shire and the Merimbula/Pambula/Tura districts out to 2036 are given in the table below.

Area	Year				
	2016	2021	2026	2031	2036
Bega Valley Shire	33,750	34,642	36,045	37,421	38,840
Tura Beach	3,702	4,088	4,418	4,781	5,116
Merimbula	4,448	4,501	4,632	4,737	4,857
Pambula	2,899	2,931	2,969	3,032	3,119
Merimbula/Pambula/Tura combined	11,049	11,520	12,019	12,550	13,092
Merimbula/Pambula/Tura % of total LGA	32.7%	33.3%	33.3%	33.5%	33.7%
Bega District	5,425	5,779	6,106	6,374	6,664
Bega District % of total LGA	16.1%	16.7%	16.9%	17.0%	17.2%

Table 1. Growth areas in Bega Valley LGA 2016 – 2036 (.id. Forecasts September 2017)

The proportion of the total number of persons in Bega Valley Shire is increasing for Bega District and Merimbula/Pambula/Tura Beach at the same rate of change. In raw terms the population of Merimbula/Pambula/Tura Beach is maintained at roughly twice the population of the Bega District over the twenty year period 2016 to 2036. This indicates a substantial catchment that is serviced by the major town of Tura Beach/Merimbula/Pambula as a combined commercial entity.

Expected growth is strongest in Tura Beach with an expected increase in population of 38.2% between 2016 and 2036 followed by Bega at 22.8%. Merimbula is forecast to grow by only 9.2% and Pambula by 7.6% over the same period.

The total shopfront floorspace of Bega is estimated to be 45,000m² which includes major retailers and supermarkets in addition to speciality shops. Bega's primacy is unquestioned as the seat of local government, major health and educational facilities, the courthouse and government offices. These civic and community services offered in Bega will ensure that its role as the regional centre is retained regardless of commercial developments in other centres in Bega Valley Shire.

The floorspace of Tura Beach and Merimbula combined, which contain two supermarkets and a small floorplate discount department store is 25,000m² - significantly less than Bega. The business zone in Tura Beach is not seen in isolation as Tura is part of a larger coastal settlement which includes Merimbula and extends as far as Pambula. These settlements combined are viewed as a single market for the purposes of ensuing that there is sufficient capacity in the supply of commercial land and that adequate services are provided to cater to the third of the population of the Shire that resides in this combined settlement.

Policy relating to the hierarchy of centres in Bega Valley has evolved to now be contained in the South East and Tablelands Regional Plan 2036. It is considered that the directions and actions of the Regional Plan that relate to business in centres are intended to be flexible so that additional land found suitable for commercial development may be rezoned, subject to demonstrating community benefit and economic justification. This seems also to have been the case with the South Coast Regional Strategy although it was not made explicit - other than to say opportunities for employment land are supported based on considerations including tenure, location, constraints and specific opportunities.

Certain land is located at Tura Beach which has been deferred from zoning under Bega Valley LEP 2013 and remains zoned for rural residential development. It's location on Sapphire Coast Drive, the major road connecting the coastal settlements to the north and south, and adjacent existing commercial development comprising a large floorplate supermarket and large format retailers, makes it highly suitable for commercial expansion rather than residential development. The provision of business that serves the day-to-day and weekly needs of the existing and incoming residents of the Tura Beach/Merimbula/Pambula area as well as visitors to the area would not undermine the community, civic and institutional services and facilities that afford Bega regional centre status. It is noted that there is limited scope for further commercial expansion given existing adjoining land uses and the presence of environmentally sensitive land.

It is considered that commercial use of vacant land at Tura will not undermine the primacy of Bega but would reinforce the role of Tura Beach/Merimbula/Pambula as a major town with strong district functions and optimise use of existing infrastructure by co-location with similar scale retail facilities. Zoning to facilitate the development of homemakers, hardware, building supplies and gardening supplies would provide these needs to the immediate surrounding area and beyond into the larger regional market catchment.

Continuing commercial development at Tura Beach/Merimbula/Pambula would be consistent with the intent of former and current State and local policy. It would be consistent with the intent of the South Coast Regional Strategy for the functions of major towns when Tura Beach, Merimbula and Pambula are seen as a single commercial precinct, and with the South East and Tablelands Regional Plan to provide more intensive employment uses in strategic (Bega) and local (Tura Beach/Merimbula/Pambula) centres. The commercial use of Tura Beach has been identified in Council's Commercial Strategy 2006 to provide full district level services for Tura Beach/Merimbula/Pambula though with limited expansion at Tura Beach, and in Council's Land Use Strategy 2008 to provide an alternative location to Merimbula for homemakers outlets and supermarkets.

Commercial development at Tura Beach is also consistent with the desired future character statement for the precinct which is:

The strong desire is for Merimbula to retain its "coastal village charm". The challenge is to try to blend that style and character into a district service centre with an anticipated resident "shopper" catchment population in the order of 11,000 persons by 2025. This population of "shoppers" more than doubles in the peak tourist season. The theme for Merimbula is to function as a large coastal village providing district level commercial services for the section of the Shire from Tura Beach to South Pambula.



D Demand for bulky goods retail type development

D.1 The Issue

The retail industry is one of the most innovative and dynamic sectors of the Australian economy. Retailers are in a constant process of change and evolution in response to factors, including

- Demographic change
- Changing consumer tastes
- Competitive pressures
- New product innovation
- Need to minimise costs
- Changes to product storage and display

For the above reasons, over time the land use planning and development context for the retail sector can change profoundly.

This is most evident when new retail entrants, or innovation by existing retailers, result in significant changes in how retail floorspace is provided by the retailers, and, subsequently, how this floorspace is used by consumers.

The introduction of ALDI and Costco to Australia has had major implications for land use planning policies in States where those brands have sought to locate. In some instances, planning policies and definitions have been unable to effectively accommodate the developments of ALDI and Costco store formats. Likewise, the rapid growth of Bunnings in the past twenty years has required the re-evaluation of how 'hardware and building supplies' retailing should be accommodated by strategic land use policies.

In the future, further change in the retail sector, including new store formats not currently envisaged by policy makers, can be expected to continue to be introduced nationally, including New South Wales and the Bega Valley Shire.

Large plate bulky goods retailers including ALDI and Bunnings have indicated their intent to locate or expand within the Merimbula/ Pambula/ Tura Beach catchment in the short term. Bega Valley Shire Council therefore needs to ensure that appropriate land use policies are in place to accommodate these formats in this catchment in a manner consistent with broader policy objectives.

D.2 Investigation

Bega Valley Shire Council adopts a 'pro-growth' strategy in relation to investment, jobs and economic opportunities. For this reason, Council has a preferred approach of attracting new and innovative retail formats that can achieve the dual goals of:

- Providing enhanced facilities and access to goods and services for the local community, and
- Generating local jobs, investment and the 'export income' associated with local spending by non-Bega Valley Shire residents.

Those goals need to be delivered in the context of well-established planning objectives and Council's desire to implement a centres-based policy for retail and commercial development.

Retailers including ALDI and Bunnings have had preliminary discussions with Council in relation to potential sites for new stores. It is understood that all these retailers are likely to locate in the Merimbula/ Pambula/ Tura Beach catchment, with other stores also being considered in the balance of the Shire.

The key difficulty for Council in considering applications for new retail entrants such as these large plate bulky goods retailers is that these types of retailers are not readily comparable with existing retail formats in Australia. As a result, special consideration of their unique retail model is required in the policy and decision-making process. With wide ranging retailing characteristics, it is important for the Commercial

Centres Strategy to provide strong policy guidance to Council in relation to how new innovative retail formats and market entrants can be appropriately accommodated.

Often the very large physical size of this retail format and the fact that they are typically free standing with a large car parking requirement, means that difficulty in finding sites of an appropriate size is a constraint in identifying a store location. Entrants have indicated that an appropriate area would be a minimum of 2 hectares. The availability of large lots of commercial land within the Merimbula/ Pambula/ Tura Beach catchment has been investigated and the results are provided in *Section E.1. Available land*.

Large format retail uses are often unable to find an appropriate location in activity centres due to factors including:

- The need for relatively large areas devoted to the display and/or storage of big or bulky items
- Servicing requirements such as large carparks and delivery areas which are often unsuited to intensive urban environments
- Patronage patterns which require easy access via road from a sub-regional or regional catchment

Interest from the retail industry has required consideration of how these types of developments may impact on activity centres and centre-based policy. Bega Valley Shire Council believe that bulky goods retailing and mixed business areas should be planned in a systematic manner which reflects the unique locational requirements of relevant businesses, but which does not undermine activity centres policy nor result in an undesirable urban development outcome.

Council resolved in 6 November 2013 to introduce the B5 Business Development zone and apply it to specific areas to enable development for commercial purposes that are not appropriate in core commercial or mixed use areas.

Controls applicable to Bulky Goods Retail and the B5 Business Development Zone

The objectives of the B5 Business Development Zone relating to retail development in the Bega Valley are:

- To enable a mix of business and warehouse uses, and bulky goods premises that require a large floor area, in locations that are close to, and that support the viability of centres.
- To cater specifically for uses that require a high degree of visibility and accessibility to passing traffic and that generate a high proportion of single purpose vehicle trips.

In this context, current planning policy in Bega Valley provides guidance on the nature of retail development that is appropriate for the B5 zone, as well as the context in which that development should be provided.

In Bega Valley, the B5 Business Development Zone is applied to areas where lower intensity retail and commercial activity, including bulky goods, can operate with the benefit of exposure to main road traffic. Examples include along Arthur Kaine Drive in Pambula and along Imlay Street in Eden, where lots range in size from 2000sqm to 8000sqm.

In recent times, Council has received interest for retail and commercial development in the Merimbula/ Pambula/ Tura Beach catchment that require larger lot sizes than is available in the existing B5 Business Development Zone.

E Available commercial land suitable for Bulky Goods Retail

A set of criteria has been established to determine the availability of commercial land within the centres of Merimbula, Pambula and Tura Beach. The criteria are based on the following attributes.

Ideally, to be suitable for bulky goods retail type development a property should be:

- a) **Constraints** - relatively unconstrained, already mostly cleared of native vegetation and not occupied by a threatened ecological community, free from bushfire and/or flooding hazard, not occupied by known cultural heritage and not identified as potentially contaminated land,
- b) **Topography** - of relatively level topography to minimise earthworks and visual impacts, and expenses associated with the construction of buildings and provision of infrastructure,
- c) **Exposure** - located so as to have a high degree of visibility and accessibility to passing traffic but be visually acceptable and not adversely impact on the amenity of an area,
- d) **Location** - in close proximity to a centre so that access to linked commercial and freight services is optimized and distances to be travelled to these services are minimized,
- e) **Land use conflict** - of low potential for land use conflict with neighbouring development or residential land uses,
- f) **Land capability** - of high land capability in terms of size or dimensions of parcels or opportunity to amalgamate multiple parcels
- g) **Clustering** - located where it forms a contiguous cluster with existing commercial development or similar, and
- h) **Services** - able to be efficiently serviced with reticulated water, sewerage disposal and access roads.

E.1 Available land

Undeveloped or underutilized existing commercial land including land zoned B1 Neighbourhood Centre, B2 Local Centre and B4 Mixed Use located within the centres of Merimbula, Pambula and Tura Beach has been assessed against the above criteria.

E.1.1 Merimbula



Figure 2. Available commercial land Merimbula

ATTRIBUTE	DESCRIPTION	
Area	0.5 – 2.7 hectares	✓
Land zoning	B2 Local Centre and B4 Mixed Use zones	✓
Land use	The larger site is currently under construction. The smaller site is developed and contains buildings that remain unoccupied. The site subject to a development application for a supermarket currently under consideration Both are surrounded by commercial development	✗
Landscape and ecology	The larger site is mapped as a coastal risk area and flood planning area	✗
Natural hazards	A watercourse is located to the north of both sites	✗
	Both sites are not mapped as bushfire prone	✗
Bega Valley LEP 2013	Both sites are minimally affected by biodiversity on the Terrestrial Biodiversity Map (sheet BIO_020B), by a watercourse on the Riparian Lands and Watercourses Map (sheet WCL_020B). Both sites are within 100 metres of a heritage item	✗

CONCLUSION There is a lack of available commercial sites in Merimbula CBD that could accommodate a bulky goods retail development due to size of available parcels or opportunity to amalgamate to create large enough site area. Remaining available sites as detailed above are subject to current development applications or approvals.

E.1.2 Pambula

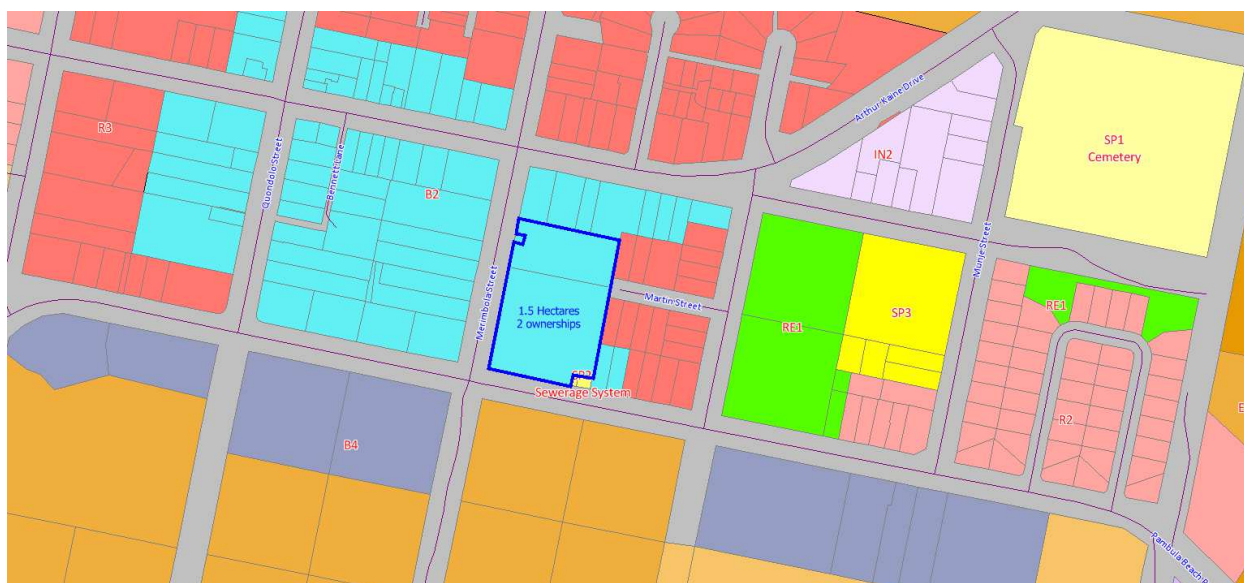


Figure 3. Available commercial land Pambula

ATTRIBUTE	DESCRIPTION	
Area	1.5 hectares	✗
Land zoning	B2 Local Centre zone	✓
Land use	The larger parcel vacant and is currently subject to a development approval for a supermarket development	✗
	The smaller parcel is vacant and currently subject to a development approval for an extension of the adjoining hardware and building supplies development	
	Both sites are surrounded by commercial development to the west and north and residential development to the east	✓
Landscape and ecology	Both sites are mapped as a coastal risk area and flood planning area	✗
Natural hazards	The larger site is mapped as bushfire prone	✗
	The smaller site is not mapped as bushfire prone	
Bega Valley LEP 2013	Both sites are within 100 metres of a heritage item	✗

CONCLUSION There is a lack of available commercial sites in Pambula CBD that could accommodate a bulky goods retail development due to size of available parcels or opportunity to amalgamate to create large enough site area. The remaining available site as detailed above has low opportunity to amalgamate and both parcels are subject to current development approvals.

E.2 Assessment Criteria

A set of criteria has been established to determine the suitability of land within the Merimbula/ Pambula/ Tura Beach catchment for future B5 Business Development zoning and bulky goods retail type development. The criteria is based on the attributes described above and available information for Bega Valley LGA.

Ideally, to be suitable for bulky goods retail type development a property should be:

- a) **Constraints** - relatively unconstrained, already mostly cleared of native vegetation and not occupied by a threatened ecological community, free from bushfire and/or flooding hazard, not occupied by known cultural heritage and not identified as potentially contaminated land,
- b) **Topography** - of relatively level topography to minimise earthworks and visual impacts, and expenses associated with the construction of buildings and provision of infrastructure,
- c) **Exposure** - located so as to have a high degree of visibility and accessibility to passing traffic but be visually acceptable and not adversely impact on the amenity of an area,
- d) **Location** - in close proximity to a centre so that access to linked commercial and freight services is optimized and distances to be travelled to these services are minimized,
- e) **Land use conflict** - of low potential for land use conflict with neighbouring development or residential land uses,
- i) **Land capability** - of high land capability in terms of size or dimensions of parcels or opportunity to amalgamate multiple parcels
- f) **Clustering** - located where it forms a contiguous cluster with existing commercial development or similar, and
- g) **Services** - able to be efficiently serviced with reticulated water, sewerage disposal and access roads.

Land within the Merimbula/ Pambula/ Tura Beach catchment has been qualitatively assessed against the above criteria and the results are provided in *Section E.2. Assessment of suitability*. The conclusion as to whether or not an area of land is potentially suitable for bulky goods retail type development is made 'on balance'. That is, if the majority of the criteria are satisfied and there are no absolute limiting constraints such as flooding, ability to provide services or limitations on land area, then an area may be considered suitable for this type of development at a strategic level.

E.3 Assessment of suitability

E.3.1 Area 1 – Tura Beach Drive, Tura Beach

Area 1 is located at the intersection of Tura Beach Drive and Sapphire Coast Drive at the entrance to Tura Beach Centre on Tura Beach Drive, Tura Beach. It is shown in Figure 5 below.



Figure 5. Area 1 Tura Beach Drive, Tura Beach

ATTRIBUTE	DESCRIPTION
Property description	Lots 33 and 34 DP 243029
Area	4 hectares
Land zoning	1c Rural Small Holdings Zone
Land use	Vacant land. The northern boundary along Sapphire Coast Drive is vegetated, the remainder of the site is relatively cleared
Landscape and ecology	Area 1 is not mapped as a coastal risk area or flood planning area
Natural hazards	Area 1 contains a drainage line that run east west across the southern part of Lot 34
	Majority of the site is mapped as bushfire prone
Bega Valley LEP 2013	Deferred from Bega Valley LEP 2013 Mapped as biodiversity on the Terrestrial Biodiversity Map (sheet BIO_020) Minimally affected by a watercourse on the Riparian Lands and Watercourses Map (sheet WCL_020)

ASSESSMENT		
CONSTRAINTS	Area 1 would require minimal clearing of vegetation prior to development. The site is currently a deferred matter under Bega Valley LEP 2013 and would require a rezoning to a B5 Business Development zone.	✓
TOPOGRAPHY	Area 1 is relatively flat	✓
EXPOSURE	Area 1 is a corner site and has excellent visual exposure to both Sapphire Coast Drive and Tura Beach Drive, Tura Beach	✓
LOCATION	Area 1 is in close proximity to the local centre of Merimbula and forms part of the Tura Beach centre	✓
LAND USE CONFLICT	Area 1 adjoins an aged care facility which is developed on the north eastern portion of neighbouring Lot 944 DP 788525. Area 1 is located adjacent to Woolworths supermarket and the Tura Beach commercial centre precinct. There is moderate potential for conflict with adjoining land uses if developed for bulky goods retail type uses	✗
LAND CAPABILITY	Area 1 is considered to be of high land capability due to the minimal constraints and the size and dimensions of the site	✓
CLUSTERING	Area 1 is adjacent to the existing Tura Beach commercial centre precinct which contains similar existing bulky goods warehouse type development (i.e. Harvey Norman)	✓
SERVICES	Area 1 could potentially gain access off either Tura Beach Drive or Sapphire Coast Drive. Reticulated water and sewer services may be provided to the site	✓

Although generally level, free of environmental constraints and in geographic proximity to existing commercial development, Area 1 does have a moderate potential for land use conflict with adjoining land however careful design considerations* could significantly reduce any negative impacts on amenity. This land is highly visible to both Sapphire Coast Drive and Tura Beach Drive and it is located at the gateway to Tura Beach. The site is suitable in terms a size to accommodate a bulky goods retail type development and associated elements such as carparking and delivery areas. Area 1 (Lots 33 and 34 DP 243029) is assessed to be suitable for future B5 zoning and bulky goods retail type development.

**Design considerations have been detailed in Section F Design considerations*

E.3.2 Area 2- Tura Beach Drive, Tura Beach

Area 2 is located within Tura Beach centre on the northern side of Tura Beach Drive, Tura Beach. It is shown in Figure 6 below.

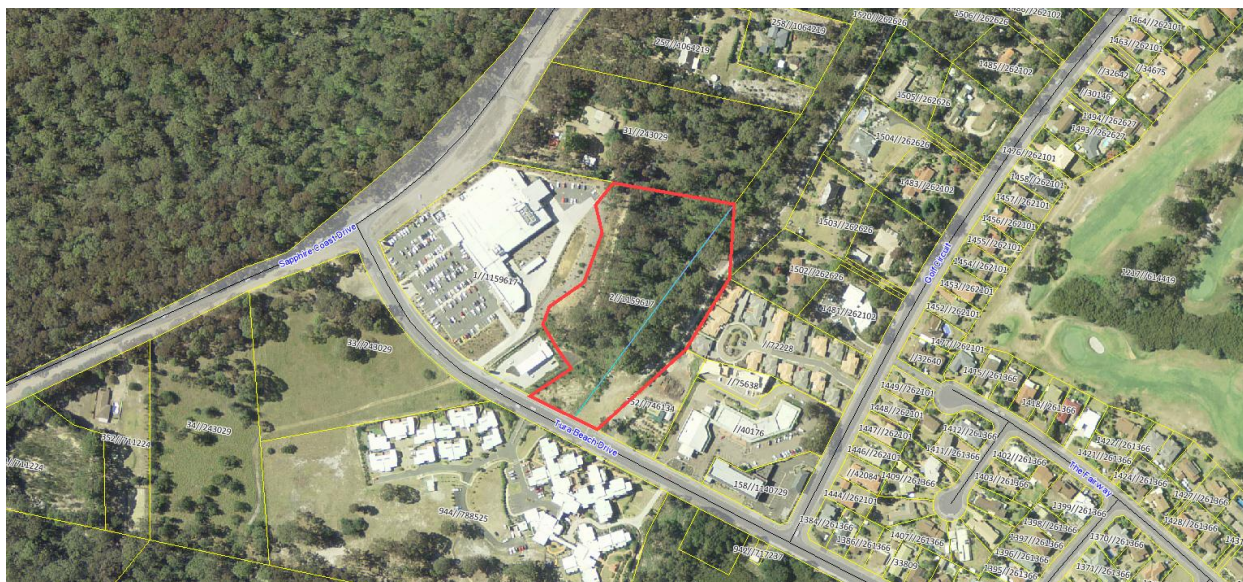


Figure 6. Area 2 Tura Beach Drive, Tura Beach

ATTRIBUTE	DESCRIPTION
Property description	Lots 2 DP 1159617 and Lot 1520 DP 262626
Area	2.2 hectares
Land zoning	B1 Zone
Land use	<p>Vacant land. The majority of the site to the north east is heavily vegetated with an area of cleared land alongside the Tura Beach Drive</p> <p>Site adjoins the Woolworths Shopping complex to the west and seniors living development to the east</p>
Landscape and ecology	<p>Area 2 is gently sloping towards the south east</p> <p>Area 2 is not mapped as a coastal risk area or flood planning area</p> <p>The site is mapped as bushfire prone</p>
Bega Valley LEP 2013	<p>Clause 6.10 of BV LEP 2013 applies to Lot 2 DP 1159617 limiting the floorspace of a retail premises to a maximum of 5000sqm.</p> <p>Majority of the site is mapped as biodiversity on the Terrestrial Biodiversity Map (sheet BIO_020)</p>

ASSESSMENT		
CONSTRAINTS	Area 2 would require some clearing of vegetation prior to development. The site is currently zoned B1 Neighbourhood Centre under Bega Valley LEP 2013. The land is bushfire prone. This area has dual ownership. Lot 1520 DP 262626 is a Council Reserve owned and managed by Council and is classified as Community Land. This area of the reserve would require a reclassification to Operational Land to be developed for commercial purposes.	✗
TOPOGRAPHY	Area 2 is gently sloping toward the south east toward Tura Beach Drive	✓
EXPOSURE	The area has excellent visual exposure Tura Beach Drive, Tura Beach	✓
LOCATION	Area 2 is in close proximity to the local centre of Merimbula and forms part of the Tura Beach centre	✓
LAND USE CONFLICT	Area 2 adjoins the Woolworths Shopping complex to the west and seniors living development to the east. There is moderate potential for conflict with adjoining land uses if developed for bulky goods retail type uses	✗
LAND CAPABILITY	Area 2 is considered to be of moderate land capability due to the minimal constraints and the size and dimensions of the site area and the parcels of land are currently in two ownerships	✗
CLUSTERING	Area 2 would be in close proximity to surrounding commercial area of Merimbula and form part of Tura Beach centre	✓
SERVICES	Area 2 could potentially gain access off Tura Beach Drive. Reticulated water and sewer services may be provided to the site	✓

Area 2 is generally level and in geographic proximity to existing commercial development. Area 2 has a moderate potential for conflict with adjoining land uses if developed for bulky goods retail type uses, however careful design considerations* could significantly reduce any negative impacts on amenity. This land is highly visible to Tura Beach Drive. The site is suitable in terms of size to accommodate a bulky goods retail type development and associated elements such as carparking and delivery areas. Area 2 (Lots 2 DP 1159617 and Lot 1520 DP 262626) is assessed to be suitable for bulky goods retail type development.

**Design considerations have been detailed in Section F Design considerations*

E.3.3 Area 3 – Arthur Kaine Drive, Pambula

Area 3 is located at the far north eastern end of the existing B5 Business Development Zone on Arthur Kaine Drive, Pambula. It is shown in Figure 7 below.



Figure 7. Area 3 Arthur Kaine Drive, Pambula

ATTRIBUTE	DESCRIPTION
Property description	Lots 325 & 363 DP 750227 and Lot 515 DP 823195
Area	2.2 hectares
Land zoning	B5 Business Development
Land use	Vacant land. The northern half of the lot is heavily vegetated
Landscape and ecology	The far north eastern corner of Area 4 is mapped as a coastal risk area
Natural hazards	Lot 363 contains 617sqm of Class 2 Acid Sulfate Soils in the north eastern corner
	Lot 363 is located within the Coastal Risk Zone as it contains land within the 3m AHD contour
	Mapped as bushfire prone
Bega Valley LEP 2013	<p>Mapped as biodiversity on the Terrestrial Biodiversity Map (sheet BIO_020)</p> <p>Minimally affected by a watercourse on the Riparian Lands and Watercourses Map (sheet WCL_020)</p> <p>Mapped as Class 2 Acid Sulfate Soils on the Acid Sulfate Soils Map (sheet ASS_020A)</p>

ASSESSMENT		
CONSTRAINTS	Area 3 would require the clearing of vegetation prior to development. Bega Valley DCP 2013 requires a 10 metre setback from Arthur Kaine Drive for vegetation retention and landscaping. The north eastern corner of Area 3 is affected by coastal hazards and acid sulfate soils and is in very close proximity to wetlands located to the east. The need to setback development to the watercourse to protect water quality means that only a narrow area of land would be available for development. The land is bushfire prone. Lots 515 DP 823195 and Lot 363 DP 750227 are subject to a Crown Reserve for future public requirements however there is no disposal action current.	✗
TOPOGRAPHY	Area 3 gently slopes from west to east of the site	✓
EXPOSURE	The area has excellent visual exposure to Arthur Kaine Drive, Pambula	✓
LOCATION	Area 3 is in close proximity to the local centre of Merimbula and the village of Pambula	✓
LAND USE CONFLICT	Lot 325 envelopes a residential dwelling on Lot 341 DP 750227 and is surrounded by Crown Land from the north and east. Area 4 is located adjacent the Merimbula Pambula Golf Club. There is a low potential for conflict with adjoining land uses if developed for bulky goods retail type uses	✗
LAND CAPABILITY	Area 3 is considered to be of low land capability due to the size of parcels and shallow dimensions of the site and the parcels of land are currently in two ownerships	✗
CLUSTERING	Area 3 adjoins existing B5 zoned land and is within close proximity to similar bulky goods warehouse type development	✓
SERVICES	Area 3 could potentially gain access off Arthur Kaine Drive by way of an access point via Lot 325 DP 750227. Reticulated water and sewer services may be provided to the site	✓

Area 3 is relatively flat and in geographic proximity to existing B5 zoned land and commercial development. The site has a low potential for conflict with adjoining land uses if developed for bulky goods retail type uses. Although this land is highly visible to Arthur Kaine Drive, Lot 363 is affected by coastal hazards and acid sulfate soils and is in very close proximity to wetlands and the need to setback development to the watercourse to protect water quality means that only a narrow area of land would be available for development. The site is unsuitable in terms of size to accommodate a bulky goods retail type development and associated elements such as carparking and delivery areas as the lots are restrictive in terms of depth (approx. 100 metres). Area 3 (Lots 325 & 363 DP 750227 and Lot 515 DP 823195) is assessed to be suitable for smaller scale commercial development that do not require such a large footprint, and considered to be unsuitable for future bulky goods retail type development.

F Design considerations

The following design criteria should be considered as part of any bulky goods retail type development.

GENERAL CONSIDERATIONS	
<ul style="list-style-type: none"> • The bulk and scale of development needs to respond to the natural features of the site and prevailing streetscape in terms of height and setbacks. • The design of the building needs to provide a clearly identifiable sense of address and wayfinding for pedestrians, cars and large vehicles. • Buildings need to achieve a level of human scale where pedestrians have a sense of space, safety and openness within the public domain. 	
BUILDING ELEMENTS	
<ul style="list-style-type: none"> • Facades need to include a mixture of colour, texture and materials where the corporate branding is not the dominant feature. • The roof spaces need to be articulated with a variety of materials and colour treatments. Plant and equipment needs to be concealed and shielded from the public domain. • Signage should not dominate the façade and form part of the building with limited illumination. 	
COLOURS AND MATERIALS	
<ul style="list-style-type: none"> • Buildings need to use a colour palette that responds to the site and prevailing streetscape with a mixture of natural tones. • Sustainable design is encouraged through the innovative use of materials that are energy efficient, recycled or from local sources. • The reflectivity needs to be considered in the choice of any colour or material finish. 	
LANDSCAPING	
<ul style="list-style-type: none"> • Landscaping needs to be integrated into the design and soften the appearance of the building, fencing and any hardstand areas. • Any landscaping needs to enhance the overall appearance of the development with a mixture of advanced trees, shrubs and groundcovers that suit our climatic conditions with a plan for their ongoing maintenance. 	
AMENITY	
<ul style="list-style-type: none"> • The design and layout needs to take into account adjoining land uses, particularly in terms of noise, light and amenity. • Hours of operation, location of mechanical plant and equipment and movement of large vehicles needs to be considered within the context of any sensitive neighbouring development and existing noise sources. 	

INFRASTRUCTURE	
<ul style="list-style-type: none">Buildings need to consider connectivity with existing infrastructure including the broader street network, vehicle access and views from the public domain. Alternative transport options should be encouraged within the design.	
GATEWAY BUILDINGS AND CORNER TREATMENTS	
<p>The location of buildings at the junction of major transport corridors into a township requires careful consideration as they can impact on the character of a town and provide a sense of arrival.</p> <p>The following requirements apply to gateway buildings;</p> <ul style="list-style-type: none">Corporate colours should not dominate the visual appearance of a building and limited to signage space. The use of corporate colours should not be permitted outside of the nominated advertising space of the development.Buildings need to be constructed in a mixture of solid and lightweight building materials. The use of lightweight cladding and concrete should be rationalised. At least 20% of the façade needs to be constructed in alternative materials such as glass, bricks, wood or stone. The use of local or recycled materials is encouraged to provide some local context.The setbacks need to be provided with additional landscaping that enhances the appearance of the development and softens the impact from both street frontages.	

G Recommendations

Land capacity for additional commercial development exists at Tura Beach and Pambula that will assist to relieve pressure on Merimbula by providing goods and services to cater to local day-to-day shopping as well as limited weekly comparison goods. New commercial development should be consistent with the desired future character for Merimbula as stated in Bega Valley Development Control Plan 2013 and demonstrate economic and community benefits in accordance with action 12.5 of the South East and Tablelands Regional Plan.

Area 1 and 2 have been assessed as suitable sites for a bulky goods retail development as both sites are within close geographic proximity to existing commercial development, will optimise existing infrastructure by co-location with similar scale retail facilities and are sites with high visibility and accessibility to passing traffic. However both sites have potential land use conflict in terms of visual amenity and noise with neighbouring residential development. Any bulky goods retail development on either site would have to carefully consider design elements which complement the surrounding neighbourhood and existing development in terms of building elements, external building treatments and landscaping. Any development on Area 1 would have to give additional consideration to the design elements required for Gateway buildings and corner treatments as development around a junction of major transport corridors can impact on the character of a centre.

Due to the shallow dimensions of the site, Area 3 has been assessed as unsuitable for a bulky goods retail development of this scale and would be more suited to a smaller scale commercial development that does not require such a large footprint for the building and associated parking and loading facilities.

Bega is to maintain its primacy as the regional centre offering civic and community facilities, and the full range of commercial and industrial goods and services. The presence of local government, health and education facilities, financial and higher order retail facilities will protect the functioning of Bega as a strategic centre in accordance with the South East and Tablelands Regional Plan.

The combined commercial precinct of Tura Beach/Merimbula/Pambula is a local centre that reinforces the primacy of Bega through offering high level retail and trade facilities that serve the immediate catchment and beyond.

APPENDIX

Appendix A

The General Manager
Bega Valley Shire Council
PO Box 492
Bega NSW 2550

18 September 2017

Dear Sir/Madam

PLANNING ADVICE REGARDING TURA BEACH AND THE SOUTH EAST AND TABLELANDS REGIONAL PLAN

Bega Valley Shire Council is currently reviewing the *Bega Valley Shire Commercial Strategy 2006* in response most recently to the findings of the Southern Joint Regional Planning Panel of a Gateway Review of PP 2016_BEGAV_001-00. The planning proposal relates to the rezoning of certain land at Tura Beach (Lots 33 and 34 DP 243029 Tura Beach Drive) to zone B5 Business Development under *Bega Valley LEP 2013*.

Zenith Town Planning has been engaged to provide specific planning advice regarding the functions and directions of the Tura Beach/Merimbula/Pambula commercial precinct in the context of the directions of the *South East and Tablelands Regional Plan*.

This advice has been guided by correspondence between the Department of Planning & Environment and Bega Valley Shire Council dated 27 June 2017 concerning the review of Council's Commercial Strategy. In particular, this advice responds to the requirement to provide a *discussion in the context of the draft South East and Tablelands Regional Plan*. In doing so, the relevant directions and actions of key Council and NSW Government strategic documents are identified to provide background. These are the *South Coast Regional Strategy*, the *South East and Tablelands Regional Plan*, the *Bega Valley Shire Commercial Strategy 2006*, the *Bega Valley Shire Land Use Planning Strategy 2008* and a report prepared by Hill PDA for the Department of Planning & Environment in 2008.

In addition the following documents have been reviewed to inform this advice:

- Bunnings Merimbula Economic Impact Assessment, Final Report, Essential Economics February 2016
- Bega Valley LEP 2013 Planning Proposal: Tura Beach Business Development Zone, Bega Valley Shire Council May 2016
- PP 2016_BEGAV_001-00 Planning Team Report, Department of Planning & Environment 6 July 2016
- Bega Valley Gateway Determination: PP 2016_BEGAV_001_00, Department of Planning & Environment 15 August 2016
- Review of Gateway Determination, DFP Planning Consultants, September 2016
- PP 2016_BEGAV_001-00 Gateway Review Preliminary Report, Department of Planning & Environment 24 October 2016
- Referral of the Request for the Review of Gateway Determination of PP 2016_BEGAV_001_00 – Tura Beach (Bunnings), Department of Planning & Environment 31 October 2016
- 2016SIH029 – Bega Valley - PP 2016_BEGAV_001-00 Gateway Review – Advice Report, Southern Joint Regional Planning Panel 3 February 2017

This advice is limited to responding to clarification of the role of Tura Beach/Merimbula/Pambula in relation to the Regional Plan. The merits of the planning proposal, and the findings of the Department and the JRPP are not addressed in this advice. However, the suitability of the land that is subject to the planning proposal is considered briefly in terms of the future of Tura Beach.

South Coast Regional Strategy

The *South Coast Regional Strategy* released by the Department of Planning in 2006 contains a table in *Chapter 7 Economic development and employment growth* that identifies the hierarchy of centres within Shoalhaven, Eurobodalla and Bega Valley LGAs. Centres are classified as either a regional city, major regional centre, major town or village. Bega is listed in the table as a major regional centre, Merimbula as a major town and Pambula as an example of a town. Bega is described in text in the chapter as *an emerging regional centre ... which plays ... a key economic role ... which can be further strengthened by the location of new finance, administration, business services and retail jobs within centres*. An outcome of the strategy is to concentrate employment growth around existing well-serviced commercial centres such as Bega.

The key functions of a major regional centre such as Bega are described in the strategy as:

Provide for the majority of growth within the Region. A concentration of medium and high density living, business, employment, professional services, specialised shops and associated warehouse, transport logistics and bulky goods operations. Focal point for subregional road and transport networks.

The key functions of a major town such as Merimbula are described as:

Existing smaller centres identified for a lesser proportion of growth. Provide a shopping and business centre for the district, including warehouses, transport logistics, bulky goods operations, health and professional services, mixed with medium density residential.

The key functions of a town such as Pambula are:

Small centres that vary in size. Small-to-medium concentrations of retail, health and other services with lower density residential. Reliant on higher order centres for shopping and employment.

Relevant actions of the *South Coast Regional Strategy* are to protect and add to employment lands in existing economic centres, including major regional centres and major towns ... and ... mechanisms and controls will be identified to preserve and support the hierarchy of commercial centres.

Bega Valley Shire Commercial Strategy 2006

The role of Bega as the regional administrative centre providing commercial, retail and public services to Bega Valley Shire and beyond is supported in the Commercial Strategy.

The *Commercial Strategy* groups Merimbula, Pambula and Tura Beach into a single centre. Its role is to provide weekly service needs for the communities of Tura Beach, Merimbula, Pambula, Pambula Beach and South Pambula plus the rural hinterland. Only limited expansion is seen as being possible or necessary for the Tura Beach and Pambula commercial zones. The theme for this combined commercial centre includes:

- *Full district level services to meet weekly shopping requirements*
- *Tura to remain a local servicing centre*
- *Pambula to build on its heritage theme as a local service centre but with some bulky goods clusters*

In the short term, it is recommended in the strategy that Council support an immediate amendment to the planning scheme to facilitate an extension of the current Tura business zone to the immediate west of up to 4 hectares that would have capacity for up to 6,000m² of commercial floorspace plus capacity to accommodate childcare, medical/professional suites and possibly a service station. This rezoning has been implemented.

At the time this strategy was prepared Council envisaged that Tura Beach would remain a small local centre to service the needs of the surrounding residential area.

Bega Valley Shire Land Use Planning Strategy 2008

This strategy was prepared to inform *Bega Valley LEP 2013* and considered the economic role of each settlement in the LGA. Bega is identified as the regional commercial centre and the main target for regional scale industrial and retail growth. Securing bulky goods and major retail developments is identified as a challenge for Bega.

The role of Merimbula, which includes Pambula and Tura, is to provide district retail services with a focus on weekly needs. Tura Beach is seen as having a support role to Merimbula with a proposed expansion of 5,000m² of retail floorspace to improve the ability of Tura Beach centre to service local needs and to provide alternative options for homemaker and supermarkets in the Merimbula district. The proposed additional retail capacity has been enacted through the allocation of zone B1 Neighbourhood Centre in *Bega Valley LEP 2013*.

The future role of Tura Beach has evolved since the *Commercial Strategy 2006* to the point where Council has now grouped the three settlements of Tura Beach, Merimbula and Pambula into one commercial precinct with the capacity to offer comparison goods from Tura Beach.

Review of Bega Valley LEP Draft Amendment No 4 February 2008

This report prepared by Hill PDA Property Consulting has been cited by the Department of Planning & Environment as supporting the primacy of Bega as the regional commercial centre. It was prepared to review an amendment to the previous Bega Valley planning scheme.

It was recommended that a large supermarket could be developed in either Merimbula or Tura Beach without any negative effect on the economic functioning of Bega. However, department stores, including discount stores are best located in Bega, with bulky goods outlets being developed as close to Bega town centre as possible. It is also recommended that limitations be placed on the

development of 'out-of-centre' or homemaker/bulky goods outlets in smaller centres to protect Bega as the regional centre. Examples of such limitations are not provided in the report.

South East and Tablelands Regional Plan

The *South East and Tablelands Regional Plan* was released by the Department of Planning and Environment in July 2017. The draft version of the Regional Plan contained a direction to *Strengthen the commercial function of the region's centres*. This was accompanied by a table identifying metropolitan cities and regional centres of which Bega is one of the latter. The functions of each were described in the table. Text beneath the table encouraged councils to identify their centres hierarchy and noted for example that it would be appropriate for major towns such as Merimbula *to be recognised for the strong district functions*. Action 4.3.1 of the draft plan was to *Focus commercial and retail activities within the region's centres in line with the regional centres hierarchy*.

Neither the regional centres hierarchy table or Action 4.3.1 were carried forward into the adopted Regional Plan which is now in force. Bega is now defined as a strategic centre being a centre *with the largest commercial component of any location in the region and that provide a full range of higher-order services, including access to hospitals and tertiary education services*.

The role of centres is described in the glossary to the adopted plan as *Centres provide jobs and services such as shopping, dining, health and personal services to meet the daily and weekly needs of the local community*.

Direction 12 of the Regional Plan is to *Promote business activities in urban centres*. It is stated in the plan that *Strategic and local centres are to be the focus of more intensive employment uses*, however, 'local' centres are undefined and the plan does not identify the hierarchy of centres in the same way as the *South Coast Regional Strategy*.

Relevant actions of the plan are:

12.3 Reinforce the role and function of centres as the primary places for commerce, retail, social activity and regional services through local strategies and local environmental plans.

12.4 Focus future commercial and retail activity in existing commercial centres, unless there is a demonstrated need and positive social and economic benefits to locate this activity elsewhere.

12.5 Require proposals for new retail development to demonstrate how they:

- *respond to retail supply and demand needs;*
- *respond to innovations in the retail sector;*
- *maximise the use of existing and planned infrastructure (including public transport and community facilities) commensurate with the scale of the proposal; and*
- *enhance the value of the public realm.*

Other than reinforcing the role and function of existing centres, these actions do not indicate the primacy of any strategic centre or any other centre, or the preferred hierarchy of centres. The actions appear to ensure that there is flexibility built into the planning system to accommodate new commercial development when it can be demonstrated that there will be community benefits and where it can be justified in economic terms.

The existing roles of the Bega and Tura Beach/ Merimbula/ Pambula centres

Population and house hold forecasts for settlements within Bega Valley Shire have been prepared by .id. Forecasts for Bega Valley Shire and the Merimbula/Pambula/Tura districts out to 2036 are given in the table below.

Area	Year				
	2016	2021	2026	2031	2036
Bega Valley Shire	33,750	34,642	36,045	37,421	38,840
Tura Beach	3,702	4,088	4,418	4,781	5,116
Merimbula	4,448	4,501	4,632	4,737	4,857
Pambula	2,899	2,931	2,969	3,032	3,119
Merimbula/Pambula/Tura combined	11,049	11,520	12,019	12,550	13,092
Merimbula/Pambula/Tura % of total LGA	32.7%	33.3%	33.3%	33.5%	33.7%
Bega District	5,425	5,779	6,106	6,374	6,664
Bega District % of total LGA	16.1%	16.7%	16.9%	17.0%	17.2%

The proportion of the total number of persons in Bega Valley Shire is increasing for Bega District and the Merimbula/Pambula/Tura district at the same rate of change. In raw terms the population of the Merimbula/Pambula/Tura district is maintained at roughly twice the population of the Bega District over the twenty year period 2016 to 2036. This indicates a substantial catchment that is serviced by the major town of Tura Beach/Merimbula/Pambula as a combined commercial entity.

Expected growth is strongest in Tura Beach with an expected increase in population of 38.2% between 2016 and 2036 followed by Bega at 22.8%. Merimbula is forecast to grow by only 9.2% and Pambula by 7.6% over the same period.

The total shopfront floorspace of Bega is estimated to be 45,000m² which includes major retailers and supermarkets in addition to speciality shops. Bega's primacy is unquestioned as the seat of local government, major health and educational facilities, the courthouse and government offices. These civic and community services offered in Bega will ensure that its role as the regional centre is retained regardless of commercial developments in other centres in Bega Valley Shire.

The floorspace of Tura Beach and Merimbula combined which contain two supermarkets and a small floorplate discount department store is 25,000m² - significantly less than Bega. The business zone in Tura Beach is not seen in isolation as Tura is part of a larger coastal settlement which includes Merimbula and extends as far as Pambula. These settlements combined are viewed as a single market for the purposes of ensuring that there is sufficient capacity in the supply of commercial land and that adequate services are provided to cater to the third of the population of the Shire that resides in this combined settlement.

Policy relating to the hierarchy of centres in Bega Valley has evolved to now be contained in the *South East and Tablelands Regional Plan*. It is considered that the directions and actions of the Regional Plan that relate to business in centres are intended to be flexible so that additional land found suitable for commercial development may be rezoned, subject to demonstrating community benefit and economic justification. This seems also to have been the case with the *South Coast Regional Strategy* although it was not made explicit - other than to say opportunities for employment land are supported based on considerations including tenure, location, constraints and specific opportunities.

Certain land is located at Tura Beach which has been deferred from zoning under *Bega Valley LEP 2013* and remains zoned for rural residential development. Its location on Sapphire Coast Drive, the major road connecting the coastal settlements to the north and south, and adjacent existing commercial development comprising a large floorplate supermarket and large format retailers, makes it highly suitable for commercial expansion rather than residential development. The provision of business that serves the day-to-day and weekly needs of the existing and incoming residents of the Tura Beach/Merimbula/Pambula area as well as visitors to the area would not undermine the community, civic and institutional services and facilities that afford Bega regional centre status. It is noted that there is limited scope for further commercial expansion given existing adjoining land uses and the presence of environmentally sensitive land.

It is considered that commercial use of vacant land at Tura will not undermine the primacy of Bega but would reinforce the role of Tura Beach/Merimbula/Pambula as a major town with strong district functions and optimise use of existing infrastructure by co-location with similar scale retail facilities. Zoning to facilitate the development of homemakers, hardware, building supplies and gardening supplies would provide these needs to the immediate surrounding area and beyond into the larger regional market catchment.

Continuing commercial development at Tura Beach/Merimbula/Pambula would be consistent with the intent of former and current state and local policy. It would be consistent with the intent of the *South Coast Regional Strategy* for the functions of major towns when Tura Beach, Merimbula and Pambula are seen as a single commercial precinct, and with the *South East and Tablelands Regional Plan* to provide more intensive employment uses in strategic (Bega) and local (Tura Beach/Merimbula/Pambula) centres. The commercial use of Tura Beach has been identified in Council's *Commercial Strategy 2006* to provide full district level services for Tura Beach/Merimbula/Pambula though with limited expansion at Tura Beach, and in Council's *Land Use Strategy 2008* to provide an alternative location to Merimbula for homemakers outlets and supermarkets.

Commercial development at Tura Beach is also consistent with the desired future character statement for the precinct which is:

The strong desire is for Merimbula to retain its "coastal village charm". The challenge is to try to blend that style and character into a district service centre with an anticipated resident "shopper" catchment population in the order of 11,000 persons by 2025. This population of "shoppers" more than doubles in the peak tourist season. The theme for Merimbula is to function as a large coastal village providing district level commercial services for the section of the Shire from Tura Beach to South Pambula.

Recommended strategy text

The following text is offered to include in the review of the *Bega Valley Commercial Strategy 2006*:

Bega is to maintain its primacy as the regional centre offering civic and community facilities, and the full range of commercial and industrial goods and services. The presence of local government, health and education facilities, financial and higher order retail facilities will protect the functioning of Bega as a strategic centre in accordance with the South East and Tablelands Regional Plan.

The combined commercial precinct of Tura Beach/Merimbula/Pambula is a local centre that reinforces the primacy of Bega through offering high level retail and trade facilities that serve the immediate catchment and beyond. Land capacity for additional commercial development exists at Tura Beach and Pambula that will assist to relieve pressure on Merimbula by providing goods and services to cater to local day-to-day shopping as well as limited weekly comparison goods. New commercial development should be consistent with the desired future character for Merimbula as stated in Bega Valley Development Control Plan 2013 and demonstrate economic and community benefits in accordance with action 12.5 of the South East and Tablelands Regional Plan.

If you would like to discuss this advice please contact me

Yours faithfully,

