
From: Roger Drake [REDACTED]
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To Whom it May Concern

Drakes Supermarkets is a privately owned supermarket group, employing some 6000 staff and operating 37 supermarkets in South Australia; and we have been investing in the States independent supermarket retail market since 1974 with not only supermarkets, but also newsagencies and licensed post offices.

As the owner of the business, I believe in the “centre hierarchy approach” (ie there should be a regional centre, a district centre and a local or neighbourhood centre.)

Retailers like us have invested large amounts of money knowing there is some protection. I am gravely concerned when we see larger corporations (ie Coles, Woolworths, Aldi & especially Kaufland) investing outside the existing zoning requirements. If people are to invest in retail shopping zones, I believe they need some security knowing their investment has the ability to serve the community but also able to sustain competition. It is easy for the large players to invest outside the current zones knowing full well that the land they acquire is cheaper but all this does is splits the existing zoning. A perfect example of what I call “bad planning” is the Port Canal Development; whereby clearly there was a zone at the centre of Port Adelaide, and then another zone was created; namely the Port Canal, and now we have what I believe is two substandard shopping centre developments. This is just one example, and there are plenty more examples, especially when we examine country towns. All retailers and shopping centre investors need to make decisions with their bankers & tenants knowing that they will be able to invest with some form of confidence.

When planning future land sub divisions; it should be clearly stipulated where the retail component should go; and there needs to be transparency of these policies so all investors have a level playing field; and an ad hoc approach will not give the security for people to invest.

I look forward to the State Planning Commission taken a “common sense” approach. The last thing we need is to have empty shops turning into ghettos because we have allowed a

newer & brighter centre to be opened outside the zone rather than upgrading the existing centre and working within the appropriate zones.

Kind regards,

Roger Drake

Managing Director

Mobile: 0418 834 077



Drakes.



Address:	Head Office SA	Phone:	(08) 8415 6100
	Upper Level, 159 Henley Beach Road	Fax:	(08) 8154 1400
	Torrensville SA 5031	Web:	www.drakes.com.au



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