



TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
PO Box 185 Brisbane Markets QLD

Friday, 16 December 2022

Mr John Stimson  
Presiding Member  
Expert Panel, Planning & Design Code Implementation Review  
GPO Box 1815,  
Adelaide SA 5001

Dear John

I refer to the SA Planning System Implementation Review and wish to provide the following response on behalf of TABMA Australia and Hardware Australia, the peak industry associations together representing over 700 Timber, Hardware and Building Materials businesses across Australia.

Our members employ over 10,000 Australians, supplying goods and services to the construction industry and DIY.

Timber, hardware and building supplier members are typically long established, family owned businesses looking for advocacy on their behalf where as individuals they would have limited or no voice.

Many have been in business in South Australia for generations.

Independent traders compete by providing high service levels through experienced, well trained staff.

TABMA and Hardware Australia drive new talent into the sector through our Group Training and Training operations, providing members with trainees and developing existing workers with formal qualifications in retail.

This is the first time that our associations have engaged with the State Government in relation to planning policy and we now want to take the opportunity make the following comments, after spending the last 12 or so months getting to know the new South Australian Code.

We have discussed this review at length with Mitre 10 Australia, with whom we are in line step and we support wholeheartly the positions and recommendations raised in their submission.

With that in mind, we make the following comments and recommendations.



TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
PO Box 185 Brisbane Markets QLD

It is our opinion that some changes are required in order to provide a greater level of detail and policy direction for bulking goods retailers (in particular hardware retailers) that choose to develop in 'out-of-centre' locations to give greater direction and guidance to the assessment of suitable developments and limit those which are quite simply unsuitable in certain localities.

**There is a need to ensure that planning policy facilitates a level playing field for all hardware players, and does not favour large scale national players over smaller independent hardware retailers.**

**This is not the current state of play.**

We have a strong view that activity centres and main street zones should be the primary places for hardware retailing, and support edge of centre development, adjacent to existing centres and the introduction of policy to better guide 'out of centre' development.

The location of large scale hardware stores, (and supermarkets for that matter) 'out of centres' and outside of centres, townships, main streets and core business areas have resulted in sub-optimal consequences, dividing townships, and sending existing main street businesses broke.

Put simply, large scale hardware stores that are allowed to establish in outside of activity centre zones or in centre zones that have been spatially located in the wrong area (Victor Harbor) allows those developers to acquire and develop land where the entry costs are far lower than commercial zoned land, thus giving the 'out of centre' developer a commercial and competitive advantage.

We have a firm policy position that states that large scale/ full line bulky goods hardware stores should be located in 'activity centre' zones.

Furthermore, any new proposed bulky goods 'shops' over 6,000m<sup>2</sup> in size should be subject to a thorough and robust net community benefit test that clearly demonstrates evidence of over trading, under supply of bulky goods retail floor space and an impact assessment on any existing bulky goods/ hardware retailers in the broader locality/ catchment as part of its assessment.

This is particularly the case for any 'out of centre' development.

While the performance outcomes in Part 4 General Development Policies for the 'Out of Activity Centre Development' section are generally supported, **we believe there are some critical alterations and additions to the current policy needed in relation to the concept of impact and locality or catchment which are not currently evident.**

The Code is rather site centric and fails to consider the broader locality (catchment) in which a development is proposed. When it comes to bulky good retailing and hardware store, large scale bulky goods warehouses can have a variety of impacts on a local community and locality, beyond the subject site, impacts of a visual, noise and traffic nature to name a few.



TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
PO Box 185 Brisbane Markets QLD

To address this, we support the following changes to Part 4 General Development Policies 'Out of Activity Centre Development', Assessment Provisions (AP);

- Modifying PO1.1 to ensure there is no 'unacceptable level of impact' (on existing lawful land uses) in addition to not diminishing the role of Activity Centres; and
- Replacing the word 'locations' with 'retail catchments' in PO 1.2 to ensure the provision of bulky goods/ hardware retailing in out of centres locations is about servicing a potentially under serviced 'catchment' and not an under serviced 'location', which could easily be seen as site specific.

The changes are outlined below.

Desired Outcome (DO)

*DO1 The role of Activity Centres in contributing to the form and pattern of development and enabling equitable and convenient access to a range of shopping, administrative, cultural, entertainment and other facilities in a single trip is maintained and reinforced. – no changes*

*PO 1.1 Non-residential development outside Activity Centres of a scale and type that does not **create an unacceptable level of impact (on existing lawful land uses)**, nor diminish the role of Activity Centres: - **add additional words above***

*(a) as primary locations for shopping, administrative, cultural, entertainment and community services*

*(b) as a focus for regular social and business gatherings*

*(c) in contributing to or maintaining a pattern of development that supports equitable community access to services and facilities.*

*PO 1.2 Out-of-activity centre non-residential development complements Activity Centres through the provision of services and facilities: - **replace the word 'locations' with 'retail catchments'***

*(a) that support the needs of local residents and workers, particularly in underserved ~~locations~~ **retail catchments***

*(b) at the edge of Activities Centres where they cannot readily be accommodated within an existing Activity Centre to expand the range of services on offer and support the role of the Activity Centre.*

From a zoning and overlay perspective, there are several changes that we strongly recommend the panel consider in line with the sentiments above to ensure the policy supports a level playing field and does not provide a competitive advantage to larger scale bulky goods hardware operators over smaller scale local independents.

Some of the changes are recommended with this in mind and others are recommended from a clarity in terminology and land use application perspective.



TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
 T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
 Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
 Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
 PO Box 185 Brisbane Markets QLD

The following changes are recommended and are detailed by zone, current wording and recommended changes or modification and reasoning.

### Employment Zone

A number of previously zoned Light Industry Zones eg Glynde, have under the Code transferred to a Employment Zone type. The Employment Zone policy is far more flexible and lenient than the previous Light Industry zoning which capped shops and groups of shops between 250m2 – 500m2 depending on the Council area. While this more flexible policy may be suitable in some locations, in others such as Glynde, it is not due to the nature of existing land uses, street network configuration and established density of development.

**The like for like transfer from the Light Industry Zone to the Employment Zone has been a policy failure in certain locations** such as Glynde and has now given rise to large scale bulky goods outlets (circa 13,000m2) in a location, adjacent a housing diversity zone, where shops previously had a non complying trigger of 250m2 and where the “impact” test of a new development on existing lawful land uses and the broader locality has been lost.

There is a need to return the **impact** and **locality** test in this zone.

Assessment Provisions (AP)

Desired Outcome (DO)

<i>DO 1</i>	<i>A diverse range of low-impact light industrial, commercial and business activities that complement the role of other zones accommodating significant industrial, shopping and business activities.</i>
-------------	---

<i>DO 2</i>	<i>Distinctive building, landscape and streetscape design to achieve high visual and environmental amenity particularly along arterial roads, zone boundaries and public open spaces.</i>
-------------	---

It is our opinion, that DO1 is amended to take into consideration the notion of ‘unacceptable levels of impact’ on existing lawful land uses.

DO1 should read “A diverse range of ~~low-impact~~ light industrial, commercial and business activities that are of a scale so as not to give rise to an unacceptable level of impact on the locality and complement the role of other zones accommodating significant industrial, shopping and business activities.



TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
 T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
 Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
 Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
 PO Box 185 Brisbane Markets QLD

Large scale bulky goods outlets that give rise to unacceptable levels of impacts are inconsistent with the aim of the Employment Zone to deliver low impact light industrial, service trade, motor repairs and other compatible business for a local community.

The nature of larger scale bulky goods outlet means they attract and draw customers from a significantly wider catchment area than a local convenience service to meet the day to day needs of the local community, including those types of places that make products on-site.

**With the current changing nature of modern and innovative manufacturing and the desire to re-establish and grow our modern manufacturing sector there is need to ensure an appropriate supply of employment for light industrial operations, service trade premises and the like.**

Moreover, if a local convenience shop was proposed in this zone, it would need to be 100m<sup>2</sup> or less to comply with the DTS/DPF criteria.

What the Code is actually seeking with respect to shops in the Employment Zone are shops whose activities are low impact, small-scale and generate low emissions, that manufacture on site and have small on-site retail shops- for example a cheese or pasta manufacturing business that also has a small ancillary retail shop that sells the products manufactured on site to the public.

In PO 1.2 below it is clear, that if shops are to be located in this Zone, they should be a local convenience service to meet day to day needs of the local community.

Furthermore, the shops are intended to support the sale of products made on-site as a supplement to a business activity, with an intention that such uses enhance local job opportunities and otherwise play a complementary role to activity centres.

Larger scale bulky goods outlets do not manufacturer products on site and at circa 6,000m<sup>2</sup> or greater, they are not fulfilling the role of a shop providing day to day services and amenities, therefore, it begs the question as to how a bulky goods outlet meets the DTS/DPF 1.2 criteria on the basis that to meet the criteria a 'shop' would need to be a maximum of 100m<sup>2</sup>, yet there is no limit whatsoever on a bulky goods outlet, so it is conceivable that a 6,000m<sup>2</sup> or even 12,000m<sup>2</sup> plus bulky goods outlet could meet DTS/DPF 1.2 and a shop at 101m<sup>2</sup> could not.

We purport that a bulky goods outlet at 6,000-12,000m<sup>2</sup> has a far greater impact on a surrounding locality than a 101m<sup>2</sup> shop making and selling pasta or cheese.

<p><i>PO 1.2</i>  <i>Shops provide convenient day-to-day services and amenities to local businesses and workers,</i></p>	<p><i>DTS/DPF 1.2</i>  <i>Shop where one of the following applies:</i></p>
--	--



TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
 T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
 Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
 Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
 PO Box 185 Brisbane Markets QLD

<p><i>support the sale of products manufactured on-site and otherwise complement the role of Activity Centres.</i></p>	<p>(a) with a gross leasable floor area up to 100m<sup>2</sup>  <del>(b) is a bulky goods outlet</del>          (c) is a restaurant          (d) is ancillary to and located on the same allotment as an industry and primarily involves the sale by retail of goods manufactured by the industry.</p>
--	--

It is therefore recommended that DTS/DPF 1.2 (b) is removed from the table.

Under Table 4 - Restricted Development Classification, a 'shop' is listed as a restricted class of development subject any 'Exclusions', see below.

We recommend **rewording the restricted exclusion** to only exclude bulky goods outlets with a gross leasable floor area less than 6000m<sup>2</sup> (see **below**). This policy is consistent and aligned with the policy approach already in place regarding exclusions in both the Employment Enterprise Zone and the Strategic Employment Zone.

It also enables a higher level of assessment rigour around bulky goods outlets that are larger in scale circa greater than 6,000m<sup>2</sup> which in a policy sense given their size should be located in an activity centre zone in any case.

Class of Development	Exclusions
<p><i>Shop</i></p>	<p><i>Any of the following;</i>            (a) <i>shop with a gross leasable floor area less than 1000m<sup>2</sup></i>  <b>(b) shop that is a bulky goods outlet with a gross leasable floor area less than 6,000m<sup>2</sup></b>            (c) <i>shop that is ancillary to an industry on the same allotment</i>            (d) <i>shop that is a restaurant</i>            (e) <i>shop that is ancillary to a light industry on the same allotment</i>            (f) <i>shop located in the Retail Activity Centre Subzone</i>            (g) <i>shop located in the Roadside Service Centre Subzone.</i></p>

### **Recommendations - Employment Zone**

- Amend DO1 should read “ A diverse range of light industrial, commercial and business activities that are of a scale so as not to give rise to an unacceptable level of impact on the locality and complement the role of other zones accommodating significant industrial, shopping and business activities.
- Delete DTS/DPF 12.(b)



TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
 T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
 Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
 Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
 PO Box 185 Brisbane Markets QLD

- Alter the exclusions in Table 4 to read “shop that is a bulky goods outlet with a gross leasable floor area less than 6,000m2”

## Employment (Enterprise) Zone

Assessment Provisions (AP)

Desired Outcome

<i>DO 1</i>	<i>A range of industrial, warehousing, storage, and service activities with compatible business activities generating wealth and employment for the state</i>
<i>PO 1.2</i> <i>Shops catering to the surrounding workforce and residents within workers' accommodation enhances the amenity of the zone for those workers</i>	<i>DTS/DPF 1.2</i> <i>Shop (other than a bulky goods outlet) comprising any of the following:</i> <i>(a) shop with a gross leasable floor area up to 450m2</i> <i>(b) shop that is a restaurant.</i>

The exclusion of bulky goods in the DTS/ DPF 1.2 above means that Bulky goods is not seen as a DTS / DPF land use in this zone. Therefore, its inclusion as a complete exclusion without any m2 limitations in the restricted development table is not consistent with the rest of the zone policy.

We recommend rewording the restricted exclusion to only exclude bulky goods outlets with a gross leasable floor area less than 6000m2 (see **below**). This then becomes and consistent policy approach with say a shop, albeit with the restricted trigger being a less than 1000m2.

### Table 4 - Restricted Development Classification

The following table identifies Classes of Development that are classified as Restricted subject to any 'Exclusions'.

<i>Class of Development</i>	<i>Exclusions</i>
<i>Shop</i>	<i>Any of the following;</i> <i>(h) shop with a gross leasable floor area less than 1000m2</i> <i><b>(i) shop that is a bulky goods outlet with a gross leasable floor area less than 6,000m2</b></i> <i>(j) shop that is ancillary to an industry on the same allotment</i> <i>(k) shop that is a restaurant.</i>



TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
 T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
 Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
 Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
 PO Box 185 Brisbane Markets QLD

**Recommendations - Employment (Enterprise) Zone**

- *Alter the exclusions in Table 4 to read “shop that is a bulky goods outlet with a gross leasable floor area less than 6,000m2”*

**Light Industry Subzone**

Assessment Provisions (AP)

Desired Outcome (DO)

The desired outcome for the zone is specific around light industry and business activities that compliment not replicate other zones that are intended to provide shopping, administrative, civic and community activities.

<i>DO 1</i>	<i>A range of light industrial and other business activities that complement the role of other zones that provide a focus for shopping, administrative, civic and community activities.</i>
-------------	---

In our view the Light Industry Zone has lost its previous rigour around ‘impact and scale’ and the potential for that to change the nature of a ‘locality or catchment’.

Amend DO1 to read “*A range of light industrial and other business activities that are of a scale so as not to give rise to an unacceptable level of impact on the locality and complement the role of other zones that provide a focus for shopping, administrative, civic and community activities*”.

Bulky goods is not listed in PO 1.1 and DTS/DPF 1.1 as an envisaged land use.

Furthermore, in PO 1.2, there is a clear intent to provide a local convenience service to meet the daily needs of the local community and businesses, in addition to supporting the sale of products manufactured on site. In PO 1.2 a shop needs to be less than 100m2 to meet the DTS/DFP criteria.

Bulky goods outlets do not manufacturer products on site, therefore, it begs the question as to why a bulky goods outlet exceeding 250 square metres meets the DTS/DPF criteria.

This is a inconsistent policy approach.

We recommend removing DTS/DPF 1.2 (c).

<i>PO 1.2 Shops provide a local convenience service to meet the day to day needs of the local community and surrounding businesses as well as support the sale</i>	<i>DTS/DPF 1.2 Shop that meets any one of the following: (a) has a gross leasable floor area not exceeding 100m2</i>
--	--





TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
 T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
 Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
 Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
 PO Box 185 Brisbane Markets QLD

<p><i>of products manufactured on-site to supplement business activities and support local employment.</i></p>	<p><i>(b) it is ancillary to and located on the same allotment as a light industry it is a bulky goods outlet and</i>  <del><i>(c) it is a bulky goods outlet and has a gross leasable floor area exceeding 250m<sup>2</sup></i></del></p>
--	--

**Recommendation - Light Industry Subzone**

- Amend DO 1 to read “A range of light industrial and other business activities that are of a scale so as not to give rise to an unacceptable level of impact on the locality and complement the role of other zones that provide a focus for shopping, administrative, civic and community activities”.
- Delete DTS/DPF 1.2 (c)

**Strategic Employment Zone**

Assessment Provisions (AP)

<p>DO 1</p>	<p><i>A range of industrial, logistical, warehousing, storage, research and training land uses together with compatible business activities generating wealth and employment for the state.</i></p>
<p>DO 2</p>	<p><i>Employment-generating uses are arranged to:</i>  <i>(a) support the efficient movement of goods and materials on land in the vicinity of major transport infrastructure such as ports and intermodal freight facilities</i>  <i>(b) maintain access to waterfront areas for uses that benefit from direct water access including harbour facilities, port related industry and warehousing, ship building and related support industries</i>  <i>(c) create new and enhance existing business clusters</i>  <i>(d) support opportunities for the convenient co-location of rural related industries and allied businesses that may detract from scenic rural landscapes</i>  <i>(e) be compatible with its location and setting to manage adverse impacts on the amenity of land in adjacent zones.</i></p>
<p>DO 3</p>	<p><i>A pleasant visual amenity from adjacent arterial roads, adjoining zones and entrance ways to cities, towns and settlements.</i></p>

The desired outcome for the zone is specific around industrial, logistical, warehousing, storage, research and training land uses while managing visual amenity from arterial roads, and adjoining zones, facilitating higher order movement of goods and materials from ports, harbours, business clusters, while ensuring the management of adverse impacts on adjacent zones.

Bulky goods is not listed in PO 1.1 and DTS/DPF 1.1 as an envisaged land use.



TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
 T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
 Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
 Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
 PO Box 185 Brisbane Markets QLD

Furthermore, in PO 1.2, there is a clear intent to ensure the zone incorporates a range of uses, which are low impact in nature and mitigates adverse safety and amenity impacts.

<p><i>PO 1.2</i>  <i>Development on land adjacent to another zone which is used for residential purposes incorporates a range of low-impact, non-residential uses to mitigate adverse amenity and safety impacts on the adjoining zone.</i></p>	<p><i>DTS/DPF 1.2 Development involving any of the following uses on a site adjacent land in another zone used for or expected to be primarily used for residential purposes:</i></p> <ul style="list-style-type: none"> <li><del>(a) Bulky goods outlet</del></li> <li>(b) Consulting room</li> <li>(c) Indoor recreation facility</li> <li>(d) Light industry</li> <li>(e) Motor repair station</li> <li>(f) Office</li> <li>(g) Place of worship</li> <li>(h) Research facility</li> <li>(i) Service trade premises</li> <li>(j) Store</li> <li>(k) Training facility</li> <li>(l) Warehouse</li> </ul>
---	--

Larger scale bulky goods outlets/ hardware outlets greater than 6,000m<sup>2</sup> are often stand-alone tenancies and are thus unable to support a range of low impact uses due to the land size they need to occupy. In addition, a large-scale hardware store at 6,000m<sup>2</sup> or greater will be a substantial generator of traffic, by virtue of significant vehicle number generated (thousands of vehicle movements per day) by the general public, tradespeople and delivery drivers in trucks of varying sizes. Moreover, they are open seven days a week, with long operating hours. The newer models have also been multi storey (Glynde 18 metres high) and therefore can arguably have a significant impact on visual amenity, especially in a neighbouring low density neighbourhood type zone.

Therefore, it is suggested that bulky goods outlet, namely DTS/DPF 1.2 (a) is removed.

Likewise, in PO 1.3, there is a clear intent for shops to provide a local convenience day to day services to meet the daily needs of the local community and workers in addition to supporting the sale of products manufactured on site and otherwise play a complementary role to activity centres.

Larger scale bulky goods outlets do not manufacturer products on site and circa 6,000m<sup>2</sup> or greater, they are not fulfilling the role of a shop providing day to day services and amenities, therefore, it begs the question as to how a bulky goods outlet meets the DTS/DPF 1.3 criteria on the basis that to meet the criteria a 'shop' can be a maximum of 250m<sup>2</sup>, yet there is no limit whatsoever on a bulky goods outlet, so its conceivable that a 6,000m<sup>2</sup> plus bulky goods outlet could meet DTS/DPF 1.3.



TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
 T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
 Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
 Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
 PO Box 185 Brisbane Markets QLD

<p><i>PO 1.3</i>  <i>Shops provide convenient day-to-day services and amenities to local businesses and workers, support the sale of products manufactured on-site and otherwise complement the role of Activity Centres.</i></p>	<p><i>DTS/DPF 1.3</i>  <i>Shop where one of the following applies:</i>  <i>(a) with a gross leasable floor area up to 250m<sup>2</sup></i>  <i>(b) <del>is a bulky goods outlet</del></i>  <i>(c) is a restaurant</i>  <i>(d) is ancillary to and located on the same allotment as an industry.</i></p>
---	---

We recommend deleting part (b) in DTS/DPF 1.3.

<p><i>PO 1.6</i>  <i>Bulky good outlets and standalone shops are located to provide convenient access.</i></p>	<p><i>DTS/DPF 1.6</i>  <i>Bulky goods outlets and standalone shops are located on sites with a frontage to <b>and access to and from</b> a State Maintained Road</i></p>
--	--

If bulky good outlets and stand alone shops are required to be located on sites with a frontage to a State maintained road to ensure convenient access, then it stands to reason that the access to and from the site must also come via the State maintained road, not simply have a frontage to a state maintained road when the objective is about access.

Access to and from the site, via a State maintained road, should also help to minimise the impact on the surrounding locality, including reducing rat running in residential side streets.

It is therefore recommended that DTS/DPF 1.6 is amended slightly to state that bulky goods outlets and standalone shops are located on sites with a frontage and access to and from a State Maintained Road.

Alternatively, if convenient access and a frontage to a state maintained road is not essential, then PO 1.6 and DTS/DPF 1.6 is deemed superfluous and can be deleted.

Under Table 4 - Restricted Development Classification, a 'shop' is listed as a restricted class of development subject any 'Exclusions', see below.

We recommend rewording the restricted exclusion to only exclude bulky goods outlets with a gross leasable floor area less than 6000m<sup>2</sup> (see **below**). This policy would then be more consistently aligned with the policy approach in other zones such as the Employment Enterprise Zone.



TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
 T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
 Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
 Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
 PO Box 185 Brisbane Markets QLD

<b>Shop</b>	<p><b>Exclusions :</b>  <i>Any of the following;</i></p> <p><i>(a) shop with a gross leasable floor area less than 1000m<sup>2</sup></i></p> <p><b><i>(b) shop that is a bulky goods outlet with a gross leasable floor area less than 6,000m<sup>2</sup></i></b></p> <p><i>(c) shop that is ancillary to an industry on the same allotment</i></p> <p><i>(d) shop that is a restaurant.</i></p>
-------------	--

**Recommendations - Strategic Employment Zone**

- DTS/DPF 1.2 (a) bulky goods outlet is removed
- DTS/DPF 1.3 (b) bulky goods outlet is removed
- DTS/DPF 1.6 is amended to read *“Bulky goods outlets and standalone shops are located on sites with a frontage and access to and from a State Maintained Road”* or alternatively PO 1.6 and DTS/DPF 1.6 is deleted if convenient access is no longer essential.
- Modify the exclusions in the restricted category to read *“(b) shop that is a bulky goods outlet with a gross leasable floor area less than 6,000m<sup>2</sup>”*

**Mixed Use Transition Subzone**

<b>DO 1</b>	<i>Development accommodating a range of business, commercial, warehousing and light industrial uses enabling the transition of the area to mixed use development, compatible with residential development</i>
-------------	---

The key words associated with this subzone are *‘compatible with residential development’* and therefore this desired outcome speaks to the *‘intensity’* of development or *‘impact’* on residential areas.

PO 1.4 excludes bulky goods outlets, which is inconsistent with how this particular policy wording treats bulky goods in other zones, where bulky goods outlets have not been excluded, namely the Light Industry Subzone and the Strategic Employment Zone.

Therefore, there is a clear objective in this Mixed Use Transition Subzone to not have the policy apply to shops that are bulky goods outlets. If that’s the case it makes no sense to have a bulky goods outlet listed as a DTS/DPF item in PO 1.4 and as such it should be deleted.

Furthermore, it’s a poor policy stance to provide policy guidance around shops in a mixed-use subzone to meet the policy intent of PO 1.4 and DTS/DPF 1.4, but there is no such requirement on bulky goods outlets.



TABMA (a business name of Timber & Building Materials Association (Aust) Ltd ABN 12 000 045 956)  
T: 1800 822 621 | www.tabma.com.au | E: info@tabma.com.au  
Level 1/154 Pacific Highway, St Leonards NSW 2065 | PO Box 518, St Leonards NSW 1590



P. 1300 391 426 | E. eo@hardwareaustralia.com.au  
Unit 8 G2/385 Sherwood Road Rocklea QLD 4106  
PO Box 185 Brisbane Markets QLD

<p><b>PO 1.4</b> <i>Shops, <b>other than bulky goods outlets</b>, provide a local convenience service to meet the day to day needs of the local community and surrounding businesses as well as support the sale of products made on-site as a supplement to a business activity to enhance local job opportunities.</i></p>	<p><b>DTS/DPF 1.4</b> <i>Shop comprising any of the following:</i> <i>(a) shop with a gross leasable floor area up to 500m<sup>2</sup></i> <i><del>(b) shop in the form of a bulky goods outlet</del></i> <i>(c) shop that is ancillary to and located on the same allotment as a light industry</i></p>
--	--

My emphasis.

### **Recommendation - Mixed Use Transition Subzone**

- Delete DTS/DPF 1.4 (b).

### **Traffic Generating Development Overlay**

The traffic generating overlay uses terms such as 'retail' and 'commercial' and opposed to 'shop' and or 'bulky goods outlet' in relation to access to State Maintained Roads in DTS/DFP1.1, 1.2 and 1.3. This overlay should be amended for a consistency of terminology and clarity around which types of land uses and at what scale should have access via a State Maintained Road.

Thank you for the opportunity to put forward our position in relation the current Code policy and its relationship to the hardware / bulky goods sector.

We would welcome the opportunity to meet with the expert panel to discuss the detail outlined in this submission further.

Kind regards,

David Little | Chief Executive Officer  
Timber & Building Materials Association (Aust) Ltd

Alicia Oelkers | Executive Office  
Hardware Australia