



28 February 2020

DPTI.planningengagement@sa.gov.au

ATT: Michael Lennon, Planning Commissioner, State Planning Commission

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ATT: Stephen Knoll, Minister for Planning

Dear Commissioner and Minister for Planning,

As a family owned retailer, I strongly believe that we need a fair and common sense planning development system in South Australia.

Our business is situated in a local neighbourhood, and we support our local schools, sporting clubs and various charities in our local area. This support would also be reflected in regional South Australia.

If we allow out of town main supermarkets and shopping centres, we risk not only the livelihood of South Australian family businesses (some of which are second and third generations family owned), but also the support that they give to the town and community.

I am in support of SAIR's submission as follows:

- Ensure full-line supermarkets and supermarkets generally are confirmed to 'activity centre', 'main street' or 'township zones'.
- Support for edge of centre development expansion as an alternative to opening up of new centres.
- Ensure the Code does not enable or unintentionally allow 'out of centre' supermarket developments by making shops or groups of shops adhere to the Deemed to Satisfy (DTS) m2 gross leasable floor areas listed in all draft Code Zones and all proposals over the DTS triggers must be publicly notified
- Adopt a performance based approach by utilising some of the current provisions and policies to guide retail development proposed outside of a centre zone whereby it must be demonstrated that the proposal will not detrimentally impact on other existing centres.
- Any new proposed retail centre and particularly any proposed 'out of centre development' must include a full retail catchment analysis as well as a 'net community benefit test' where a consistent and transparent 'Sequential Test' is applied for Out of Centre Proposals based on:
 - o Strategic fit
 - o Net community benefit
 - o Place quality.
- Alter the Urban Neighbourhood Zone at Darley Road Campbelltown site to reduce the gross leasable floor area to DTS 500m2, greater than 500m2 publicly notifiable and more than 1000m2 is restricted as it could currently facilitate a full-line supermarket and 'out of centre' development.



Bartley Terrace West Lakes - Ph: 8449 3511

- Alter the zones of the examples as listed above or at a minimum adopt a 'placeholder' approach for zones where they are not located in the main street or the heart of the township or a core retail area to avoid unintended consequences of full line supermarkets and shopping centres being constructed away of the town's centre eg Port Augusta, Mt Gambier

A township by township review should be undertaken of each of the more 'regional Council areas' within Phase 3 (Urban areas) more broadly to fix up any untended consequences, such as those outlined above relating to Mt Gambier and Port Augusta, that SAIR have not captured.

- Undertake a series of retail catchment studies (including the Sequential Test detailed above for any specific sites) for Metropolitan Adelaide (divided into north, east, south and west) to develop a baseline understanding of existing retail centres and floor space provisions and to identify any possible areas of under or over supply.
- As part of the Regional Planning process, there should be a review of all Suburban and Townships Activity Centre Zones that are remote from the Main Street or core business areas of the townships with a view to determining if an alternate zone eg General Neighbourhoods, Employment etc is more appropriate.
- Encourage and work with Councils to invest in main street programs, revitalization and urban design initiatives (particularly in the more regional towns) to improve public realm, streetscapes and the overall presentation of the main streets and townships and to encourage uplift and private investment.

Thank you.

Yours Sincerely,

Salvatore Zucco
Director
WEST LAKES FOODLAND
PROSPECT FOODLAND
SEMAPHORE IGA