

28<sup>th</sup> Feb 2020

To Whom It May Concern

I Anthony Romeo, write this letter on behalf of the Romeo's Retail Group showing our support SAIR's submission. The Romeo's have over 40 Independent Supermarkets within SA and NSW, operating under the IGA, Foodhall, Foodland and Supa Valu IGA banners. Across both states we employ over 2500 employees. Our motto is family owned and community minded. We always endeavour to adhere to this. Our charitable work is recognised in the community, as we support a range of sporting clubs, schools, church organisations and much more.

- 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.
- 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 Neighbourhood, 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.

Kind Regards



Anthony Romeo  
Company Director