

21 September 2018

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DPTI

Ms Sarah Elding
Project Lead State Planning Policies
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SOUTH AUSTRALIA 5001

Via email: DPTI.PlanningEngagement@sa.gov.au

Dear Ms Elding

Draft State Planning Policies for South Australia

Thank you for the opportunity to provide this submission to the *Draft State Planning Policies for South Australia*. The Shopping Centre Council of Australia (SCCA) represents the interests of Australia's major owners, managers and developers of shopping centres.

Our particular interest rests with *State Planning Policy 9: Employment Lands*. We are concerned that the Government is progressing overly simplistic and selective notions of retail planning, competition and retail trends.

The SCCA works on retail and activity centres policy and planning matters in each jurisdiction. Most recently in South Australia, we were an active participant in the 'existing activity centres' Development Plan Amendment process across 2015-16. We were also actively involved in the 2014 Harper Competition Policy Review and, in this context, made a range of recommendations regarding planning systems and competition.

The SCCA is a strong proponent of centres-based planning. The concentration of activity in centres, including retail uses and development, supports many 'public good' outcomes sought by planning systems. These include choice for consumers, transport/infrastructure efficiency and productivity, environmental and heritage protection, resource protection, employment concentration, and the minimisation of land-use conflict.

We have three principle concerns with the Draft Policies.

Firstly, noting the comment above, we are keen to ensure that South Australia's planning system continues to reinforce a positive, centres-based approach to investment. In this regard, we are concerned that the Draft Policies do not currently sufficiently acknowledge the important role of activity centres, and the importance of a well-defined and supported centres hierarchy, as being critical to guide development, including investment in retail floorspace, community services and transport infrastructure investment across South Australia.

While there is reference to promoting "mixed-use" development in centres at *State Planning Policy 6: Housing Supply and Diversity – Point 4*, this is contextualised with regard to housing. While we note that there has been a subtle shift in the envisaged land uses within activity centres to encourage a higher mix of uses, with particular emphasis on higher density residential development, this is on the solid foundation of the existing activity centre / retail centre hierarchy, and the accessibility of services and facilities.

Secondly, we are concerned that the Draft Policies present an overly simplistic view of the premise of retail competition in the context of planning systems. In our view, as drafted, *State Planning Policy 9: Employment Lands – Point 6* infers that, in order to "allow for competition in the retail system...", a departure from a strong centres-based approach to retail investment may be required. However, this direction/policy fails to note the other important public policy issues which need to be addressed and managed via the planning system. A non-exhaustive list is provided above.

In this regard, we also note the premise of a "public interest test" which was incorporated within the recommendations of the Harper Competition Policy Review. This test, in general terms, asks governments to consider and acknowledge the other public benefits, not just competition, which are delivered by planning schemes and through planning decisions.

Thirdly, we are interested to understand the basis, including the associated evidence and analysis, of commentary in the Draft Policies regarding the "changing structure of retailing", and why it is has been considered appropriate to reference one type retailing in the Draft Policies - large format outlets - to the exception of other 'types' of retail. In this regard, we note that shopping centres have responded to, and continue to respond to, changing retail dynamics and consumer preferences, and do so without specific treatment or emphasis via the planning system.

The SCCA looks forward to being an active participant in the future consultation on elements of the Planning Reform process that may impact on our members interests. We would be pleased to meet with relevant staff to discuss this letter, and our areas of interest and concern. Please don't hesitate to contact Kristin Pryce, Deputy Director, SCCA, on [REDACTED] to discuss further.

Yours sincerely,

 21.7.2018

Angus Nardi
Executive Director