



21 September 2018

Mr Tim Anderson
Chair
State Planning Commission
PO Box 1815
Adelaide SA 5001

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

**RE: DRAFT STATE PLANNING POLICIES FOR SOUTH AUSTRALIA
SUBMISSION BY BUNNINGS GROUP LIMITED**

Bunnings Group Limited ("Bunnings") employs over 44,000 team members and operates 370 warehouses, stores and trade centres across Australia and New Zealand. In South Australia, Bunnings operates through 20 sites across the State and currently employs over 2,170 team members. Bunnings is a major owner and developer of property in South Australia.

The construction and operation of our stores generates significant investment and ongoing employment in the State. Over the last 12 years, Bunnings have invested more than \$360m in property development and are currently rolling out a program of three new stores across the State. These will have a construction value of around \$120m, which will generate 500 construction jobs and 480 jobs when operational. Bunnings are keen to invest more.

Bunnings is generally supportive of the purpose and intent of the planning reforms being undertaken in South Australia and has taken the opportunity to review the Draft State Planning Policies.

Our comments on these policies should be considered in the context of the challenging planning policy environment which currently exists in South Australia, where for some years it has been extremely difficult to identify sites of a sufficient area which are able to accommodate bulky goods outlets. Two of our stores which have opened in the last five years (Seaford and Victor Harbor) have required 'spot' rezoning in order to facilitate the subsequent development applications, a collective process which takes more than 5 years.

Despite previous commentary and submissions to this effect, little has been undertaken to holistically increase the supply of appropriately zoned land or to reduce the time taken to facilitate a rezoning.

Bunnings therefore have a particular interest with respect to draft State Planning Policy 9: Employment Lands. Bunnings note and support the following statements contained within the current draft:

Providing a suitable supply of land for employment uses is critical to support job growth. The planning system needs to support the diversification of our economy into a range of sectors and remove barriers to innovation. It is critical that the right signals are sent to the market to attract interest and investment across South Australia.

It is therefore vital to ensure the availability of a diverse range of well-serviced and strategically located employment lands to maximise certainty for the community and provide greater security for investment.

For example, the changing structure of retailing requires a range of different formats and methods of distribution of goods and services, land to accommodate large format outlets and the revitalisation of main streets and mixed-use precincts.

6. Allow for competition within the retail sector by providing an appropriate supply of land for all retail formats in areas that are accessible to communities.

10. Plan for employment and industrial precincts that improve economic productivity, are protected from encroachment, connect to efficient supply chains, and minimise transport impacts on existing communities.

The main comment arising from these policies is in respect to the spatial planning for employment lands. It is recognised that large precincts have been planned and established in the north and north-western portion of metropolitan Adelaide, however large format outlets such as Bunnings are intended to be distributed more widely, closer to the catchment population. It is therefore critical that the reference to 'accessible to communities' as contained in Policy 6 be retained in the final adopted policy.

Whilst Bunnings supports draft State Planning Policy 9, we note more detailed policies which will be formulated in respect to the Planning and Design Code. It is understood that such policies will be the subject of future consultation.

Moreover, Bunnings is concerned with potential ongoing delays in relation to the increased supply of land for employment uses which is spatially distributed across Greater Adelaide in order to be accessible to communities. Bunnings submit that the need for increased supply of zoned land is particularly urgent.

We observe that the non-statutory guidance notes state that the Planning and Design Code should implement state policies by providing a range of zones that support existing and future employment activities.

Bunnings requests that the implementation of such zones occurs sooner, rather than later and preferably as part of the first iteration of the Planning and Design Code, and not be delayed as part of subsequent Code amendments.

In summary, Bunnings generally supports the planning reform process and the intent of State Planning Policy 9. The need and urgency for increased supply of appropriately located employment zoned land is however reinforced. We would be pleased to further expand upon any aspect of this submission as may be required.

Please do not hesitate to contact me on [REDACTED] should you wish to discuss.

Yours faithfully,



Andrew Marks
General Manager - Property
Director Bunnings Group Limited