

## **Retail Policy Review Discussion Paper**

Organisation: **Super Cheap Auto Group Limited**

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## Group Overview

Super Cheap Auto Group is Australasia's leading retailer of automotive and boating, camping and fishing products. The Group currently has 326 stores and growing, an annual turnover in excess of \$800M and approximately 4800 team members across Australia and New Zealand. The Group listed on the Australian Stock Exchange in July 2004.

### Our Brands:



Supercheap Auto currently has 255 stores located in every state and territory in Australia and in both islands of New Zealand.



BCF currently has 56 stores located in Queensland, New South Wales, Victoria, Northern Territory and Western Australia.



Goldcross currently has 15 stores located in Queensland and Victoria.

Super Cheap Auto Group Ltd (SCAG) is strongly supportive of the Department of Planning and Community Development (DPCD) initiative to undertake a review of the State's retail planning policy. It is of strategic importance that the State's retail planning policy and statutory frameworks are capable of efficiently managing and accommodating the significant growth of the retail sector throughout Victoria. Failure to do so shall have serious ramifications for business and communities alike in terms of business investment, competitiveness of the retail sector, general economic development, employment opportunities and liveability.

Generally, SCAG is supportive of the BGRA submission in respect of this matter. Specifically, SCAG must express serious concern in respect of and state objection to several of the proposed responses to the issues and challenges identified in the Discussion Paper.

The key issues that must be addressed:

1. The need to increase the supply of suitably zoned land for the purposes of developing new bulky goods retailing / homemaker centres to meet the forecast demand.
2. The need to recognise bulky goods retailing / homemaker centres more widely in planning policy particularly in the network of activity centres.
3. The need for a revised definition of Restricted Retail Premises to take into account the existing industry and provide flexibility for future retail innovation and growth.
4. The need to defer the proposed prohibition of restricted retailing in Industrial zones pending a review of industrial land use demand and the rezoning of suitable land to increase supply.

Therefore, in addition to our general support of the BGRA submission, SCAG submits for consideration by the DPCD the recommendations detailed in the following section of the submission.

## **Recommendations:**

### **Managing growth and the network of centres**

1. The State Government should ensure the timely completion and implementation by Councils of the proposed Regional Retail Assessment, revised municipal strategies and activity centre structure plans that provide for adequate retail growth. DPCD should provide details in respect of the proposed implementation steps and timeframes for the adoption of new Structure Plans by Councils.
2. The State Government should ensure Councils adopt a consistent, robust and long term, strategic approach to the identification and appropriate zoning of adequate 'in-centre', 'edge of centre' and as appropriate 'new centre' land within each local government area. This should include a particular focus on poorly located industrial zones to create new retail supply.
3. DPCD must review the Essential Economics report *Retail Floorspace Forecast for Metropolitan Melbourne, 2006 to 2030 (March 2007)* to revise assumptions and update retail floor space estimates. It is considered that the current estimates reflect a significant underestimate of likely future demand.

### **Facilitating appropriate development in appropriate locations**

4. The process of refining planning policies to provide greater clarity and guidance for retail proposals should include a review of the network of activity centres to recognise the legitimate role and function of existing and potential future 'home-maker' centres / precincts in the broader network and hierarchy of activity centres.

### **Managing Restricted Retail Premises**

5. The current Restricted Retail Premises definition fails to recognise the contemporary nature of bulky goods retailing, entrenches an outdated methodology and perpetuates the significant uncertainty associated with it. The definition fails to encourage the effective utilisation of limited economic resources and constrains the competitiveness and innovation of the retail industry to the detriment of the broader community. DPCD should adopt a revised definition for Restricted Retail Premises that delivers improved planning certainty whilst allowing for continued retail innovation.

SCAG supports the adoption of the following definition:

### **RESTRICTED RETAIL PREMISES**

■ Land used to sell or hire:

- a) automotive parts and accessories;
- b) camping, outdoor equipment and recreation supplies
- c) electric light fittings;
- d) equestrian, pet supplies;
- e) floor and window coverings;
- f) furniture, bedding, furnishings, fabric, manchester and homewares
- g) household appliances, household electrical goods and home entertainment goods;
- h) party supplies;
- i) swimming pools; or
- j) office equipment and supplies.
- k) baby equipment and accessories
- l) sporting, fitness equipment and accessories

Or, if not one of the above categories, a premises which satisfies the following:

- (a) a large area for handling, display or storage, or
- (b) direct vehicular access to the site of the building or place by members of the public, for the purpose of loading and unloading the items into their vehicle after purchase or hire, but does not include a building or place used for the sale of foodstuffs or clothing unless their sale is ancillary to the sale of bulky goods.

### **Managing retailing in industrial areas**

6. The State Government must ensure that policy changes are implemented in such a manner to maintain a broad equilibrium of supply. DPCD should complete the proposed Regional Retail Assessment, revised municipal strategies and activity centre structure plans and implement the necessary actions, facilitating the appropriate allocation of land for retail purposes before the implementation of any amendments to the Industrial Zones in the VPP.

### **Managing new centres and major retail proposals**

7. DPCD should ensure that a sequential test for rezoning proposals should be implemented in conjunction with the implementation of changes to activity centre boundaries and the existing network of Centres following the

completion of the Regional Retail Assessments, revised municipal strategies and activity centre structure plans.

8. DPCD should provide further detail of criteria to be applied in the sequential test for rezoning proposals.

### **Improving design outcomes**

9. Key stakeholders, including the BGRA, must be consulted prior to the finalisation of the 'Guidelines for Large Format Retail Development' to ensure such guidelines are informed by key tenancy and operational requirements, striking an appropriate balance between commercial/social reality and perceptions of community benefit.