



9 February 2009

Mr Halvard Dalheim
Director, State Strategy
Department of Planning and Community Development
GPO Box 2392
MELBOURNE VIC 3001

Dear Mr Dalheim,

VICTORIAN RETAIL POLICY REVIEW, DISCUSSION PAPER

We write in response to the invitation to prepare a submission to the Victorian Retail Policy Review Discussion Paper.

To this end, Westfield has a major interest in retail policy in Victoria given our existing investment in the following shopping centres;

- Westfield Doncaster;
- Westfield Fountain Gate;
- Westfield Southland;
- Westfield Airport West;
- Westfield Bay City Geelong;
- Westfield Plenty Valley;
- Knox City Shopping Centre; and
- Central Casey Shopping Centre.

In summary, Westfield supports the review process being undertaken, and based on our assessment of the Discussion Paper, the main points in our view that need to be made are:

1. Within the recommendations related to managing retail growth, the proposal to have the State government provide assistance to local government for large retail project assessments is supported. It is also necessary for the involvement of the State government in circumstances where the responsible authority may have a commercial interest in a potentially competing development to reduce potential issues associated with conflict of interests.
2. Whilst a review of retail floor space caps are supported, any proposal to use planning tools such as zone schedules to predetermine planning outcomes, instead of allowing market forces to determine retail mix and the like, requires careful consideration and it is suggested that such restrictions are unnecessary and not warranted.
3. Consistent with Westfield submissions made to other projects, and in particular the 2004 'Out of Centre Assessment Criteria' project, there should be a review of the 'Restricted retail premises' definition. It is suggested that the current definition is not sufficiently clear regarding the types of merchandise that are legitimately 'bulky goods', and as a result, there are inequities in the retail development industry. It is also necessary to extend this review to other land use terms i.e. 'Retail premises'.
4. The proposal to prohibit 'Restricted retail premises' from industrial zones is supported, however this initiative needs to be complemented by the definition review noted above.
5. The development of Retail Assessment Criteria is supported, as is the proposal to favour in-centre locations for new large scale retail activity. Having said that, it would appear that the guidelines should also apply to circumstances where a permit is required for shop floor space, i.e. within the Business 2 Zone or the Mixed Use Zone.

6. Although it is agreed that design outcomes are an important element of retail policy and planning for new retail development, the message that 'street-based' retail formats are preferable to mall based centres needs to be qualified. It is far too simplistic and fails to acknowledge the need to have diverse retail experiences that allow consumer choice and the role that large anchor tenants play in the composition of retail developments or the commerciality of existing built form that can be incorporated in a contemporary manner into future developments without a rigid main street approach.

Again we appreciate the opportunity to participate and make a submission regarding the project, and we ask to be kept informed of its progress.

Yours sincerely



Peter Huddle
Westfield Development and Asset Management