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27 February 2009

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Department of Planning
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Our Ref: 2647647

Dear Sir/Madam

Submissions – Retail Policy Review Discussion Paper

We act for National Developers (Aust) Pty Ltd (**National Developers**).

National Developers is a substantial land owner in Victoria, particularly in the City of Darebin and the area of Preston.

Our client has reviewed the Retail Policy Review Discussion Paper and wishes to bring to your attention its particular concerns in respect of the proposal to prohibit Restricted Retail Premises in industrial zones.

Our client is concerned that there is substantial demand for restricted retailing/bulky goods land at present some of which, by necessity, must be met on industrially zoned land.

While it may be the long term intention of the State Government and local councils to consider redundant industrial land for re-zoning purposes to facilitate restricted retail use, it has been our client's experience that many local municipalities are extremely reluctant to re-zone industrial land even in circumstances where it has been demonstrated that there is no longer a demand for industrial use in that particular area.

By prohibiting the restricted retail use in industrial zones, the opportunity to make a planning permit application during the interim period within which Councils may decide to review their industrial land use supply will be lost. The proposed policy will have the effect of significantly reducing available land for restricted retail purposes subject to a planning permit.

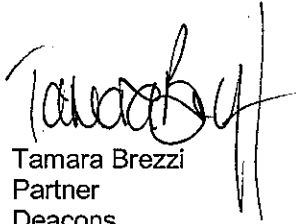
Our client is also concerned that there are many existing restricted retail premises located in industrial zones throughout Melbourne. Significant uncertainty will arise in the

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immediate and long term future if those premises must rely on existing use rights to operate.

Our client submits that the proposal to prohibit restricted retail premises in industrial zones should be abandoned.

Yours faithfully



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