SHOPPING CENTRE
COUNCIL OF AUSTRALIA

Submission to the Development Policy Advisory Committee

EXISTING ACTIVITY CENTRES POLICY REVIEW –DEVELOPMENT PLAN AMENDMENTS

21 October 2015

1 EXECUTIVE SUMMARY

Thank you for the opportunity to provide feedback on the *Existing Activity Centres Policy Review – Development Plan Amendment* (DPA 1).

The Shopping Centre Council of Australia (SCCA) represents Australia's major owners, managers and developers of shopping centres. In preparing this submission we have consulted with our members, which are significant investors in shopping centres across South Australia. We have also sought professional planning advice.

The SCCA provided the South Australian Government with a comprehensive submission in response to the previously exhibited *Preliminary Draft – Principles for activity centres and activity centre uses* (March 2015). Since that time we have also had the opportunity to discuss this process with Government officials to understand the objectives and motivations behind this review. We are grateful for the engagement we have received to date and look forward to ongoing discussions with the Government.

We still hold concerns that the Government is progressing (and justifying) its review of activity centres based on a selective interpretation and misunderstanding of recent investigations and reviews, including various Productivity Commission reviews and the Federal Government's Competition Policy review (the 'Harper Report'). We will briefly revisit these concerns in this submission.

In general terms, however, we strongly support the emphasis the Government is placing on facilitating development in its preferred locations of activity centres as the first step of the policy reform process. We are pleased that the Government is focused on stimulating "*economic diversity and development in prime retail and commercial areas within Greater Adelaide"* (Fact Sheet, page 1). This is consistent with the Government's strong and welcome emphasis on developing vibrant mixed used developments across its urban areas.

More specifically, it is our view that some proposals in DPA 1 will have a greater impact than others in terms of making the difference between a green or red light for large scale investment in an existing activity centre. The proposed standardisation of car parking rates, for example, could be material in a development feasibility, while broadening the scope of complying development to include change of use within a shopping centre may reduce unnecessary administrate hurdles and potential delays, but may not have a significant impact on investment decisions.

We made a number of recommendations in our submission to the Draft Principles which have not been addressed in DPA 1, including removing requirements for a proponent to deliver public infrastructure (eg. bus interchanges and pedestrian linkages) on private land, particularly when their location has been strategically identified due to presence of public infrastructure (ie. TODs). We would welcome an opportunity to discuss these earlier recommendations with the Government in the context of the finalisation and implementation of DPA 1. It is our view that these recommendations could have a material impact on investment propositions in existing activity areas and warrant investigation.

We also have concerns about the analysis and conclusions that Government seems to have formed with regard to the amount of 'vacant land' in various activity centres. We do not think is as relevant a metric as has been communicated in the Executive Summary and, generally speaking, we disagree with the premise of 'vacant land' potentially being used as a barometer for intervention.

Although supportive of DPA 1, we have considered the potential benefits of the proposed reforms in DPA 1 against the potential 'threats' that we perceive are posed to investment in existing activity centres by DPA 2.

We are concerned that the Government's policy approach may be self-defeating in so far as the potential benefits of DPA 1 may be 'cancelled out' by proposals in DPA 2.

We have formed this view based on the proposals and comments in the earlier Draft Principles, including unsubstantiated claims that 'new retailers' have expressed concern about their "ability to enter the market", and revealing comments in the Executive Summary which accompanies DPA 1, such as "*a second DPA will focus on expanding opportunities for existing and new businesses outside of established activity centres*" (page ii).

In its desire to attract investment to South Australia, the Government should not, inadvertently or otherwise, hard code an unlevel playing field for retail investment into its planning system.

We urge the Government to allow sufficient time for the benefits of the changes outlined in DPA 1 to be implemented and assessed prior to progressing DPA 2. We understand that the general timetable would see DPA 2 released in mid 2016. We recommend that, depending on the timing of the finalisation of DPA 1, this be delayed until 2017. This would ensure that all retail investors, including those participants looking to enter or expand in the South Australia market, have the opportunity to progress opportunities to develop in the Government's preferred locations of activity centres.

Establishing appropriate transitional arrangements will also be essential to ensuring that the release and finalisation of DPA 2 does not result in planned investment in existing activity centres being undermined. As we noted in our earlier submission,

> "...*a large anchor tenant looking to come to, or grow within, Adelaide, will not simply double its investment and establish one shop in an activity centre and one shop in an out-of-centre location. At the end of the day, in most situations there will still only be one shop, and we think it is the role of Government's strategic policy framework to make sure that it ends up in the right location*."

This risk (and uncertainty for planned investment in activity centres) will present upon the release of DPA 2 for exhibition (not simply its implementation) and, as such, we encourage the Government to carefully consider its approach to the release of DPA 2. The SCCA would be pleased to contribute to the Government's thinking in this regard.

We look forward to continuing to constructively engage with Government on both DPA 1 and DPA 2.

Angus Nardi
Executive Director

2 SUMMARY OF RECOMMENDATIONS

1. **The Government should revisit the recommendations of the Competition Policy Review Panel's final report to Government to understand the interactions between Recommendations 8 (Regulatory Review) and 9 (Planning and zoning). The Government should consider the applicability of 'Public Interest Test' with regard to DPA 2.**

2. **The Government should evaluate the impact of DPA 1 against its own reform objective of stimulating investment in existing activity centres. This should include a qualitative engagement process with major investors in South Australia.**

3. **Ensure that the changes outlined in DPA 1 are given sufficient time to be rolled-out and evaluated so as to appropriately inform the parameters of DPA 2. The earliest that DPA 2 should be released for consultation is mid-2017.**

4. **DPA 1 amendments should be revisited on a council by council basis to ensure that discrepancies in the application of, for example, new car parking standards as a result of unrelated local development plan amendments, are picked up (eg. Tee Tree Gully).**

5. **Existing drafting of the complying development provisions should be retained; no floor space threshold should be applied to the application of complying development for a change of tenancy within a shopping centre.**

6. **The Government should reconsider the proposal to remove floor space caps in non-centre zones eg. Urban Core and Suburban Activity Node Zones. At the very least this should be deferred for consideration in the context of DPA 2, and with due recognition of the existing centres hierarchy.**

7. **Ensure that development capacity – not just land vacancy - including opportunities to increase the development capacity in relevant existing activity centres, will be considered prior to or, at the very least, in the context of DPA 2.**

8. **Revisit the previous recommendations made by the SCCA to the Draft Principles which have not been addressed in DPA 1.**

9. **Ameliorate the risks associated with the release and implementation of DPA 2, including by preparing a transition strategy to ensure that planned investment in existing activity centres is not undermined. The SCCA should be engaged in this process.**

3 POLICY CONTEXT

Much like the observations offered in response to the Draft Principles, we remain concerned that the South Australian Government is basing its reform program on a misunderstanding or a selective interpretation of the various reviews and reports which addressing planning system reform.

If DPA 1 was coming in isolation - and the Government was not contemplating significant change which may fundamentally change investment propositions in existing activity centres through DPA 2 – this would not necessarily be a critical issue. However, considering the currently proposed policy pathway, we will revisit our concerns, and also share our views on the opportunities presented in the Competition Policy Review Panel's recommendations to Government (the 'Harper Report').

At the most fundamental level, we are concerned that the Government is representing the recommendations made in the context of previous reviews and inquiries as recommendations of the "Commonwealth Government" (Fact Sheet, page 2).

This isn't the case with either the recommendations of the Productivity Commission or the Competition Policy Review Panel. Neither make recommendations on behalf of the Government and, as far as we are aware, the Commonwealth Government has not made, or accepted, previous recommendations regarding competition in the planning system.

Except to repeat that the Productivity Commission based its previous recommendations on facilitating opportunities for all retail formats, not just so-called 'new' retail formats, we won't revisit in detail our concerns about the misunderstanding of the Commission's previous recommendations as these are spelled out on our earlier submission

However, we think there are some useful directions offered by the Competition Policy Review Panel's report to the Government (the 'Harper Report') with regard to competition in the planning system. (We do note that neither the Federal Government or the States and Territories have endorsed or agreed on an action plan with regard to implementing the recommendations in the Harper Report. The Harper Report was most recently discussed a meeting of the Council on Federal Financial Relations in Sydney on 16 October).

In our view, the most critical and relevant element of the Harper Report is the interaction between Recommendations 8 (Regulation review) and Recommendation 9 (Planning and zoning).

In particular, the greatest strength in the Final Report's recommendations is the proposed application of a "public interest test", as spelled out in Recommendation 8, to current "restrictions on competition in planning and zoning rules". This approach would ensure that appropriate recognition and weight in decision making is given to the other 'public goods' that are delivered through the planning system, such as infrastructure and transport efficiency, reduction in land use conflicts, and consideration of environmental and heritage preservation.

We note, however, that the recommendation seems to be written in the negative and suggests that local, State and Territory Governments, and existing investors, would need to defend prevailing land use planning policy and regulations. We infer this from the statement "the rules should not restrict competition unless it can be demonstrated that the benefits of the restrictions to the community as a whole outweigh the costs".

We stress that competition is only one of a number of relevant policy issues taken into consideration, and traded off to greater or lesser degrees, by planning authorities and urge the all Governments (Federal, State and Territory) to consider this recommendation in a way which leverages existing productivity enhancing Government investment in infrastructure and private sector investment which was delivered in line with prevailing regulation planning and zoning regulation.

In other words, the rule book **should not be thrown out the window** and only proponents seeking to have the 'rules changed' should be required to demonstrate that the benefits of their proposal to the community outweigh the costs.

This approach is akin to recommendations that the SCCA has recently made to the NSW Government in our effort to have that jurisdiction develop a Retail Investment Policy. NSW suffers from a policy vacuum with regard to centres planning and growth, and retail investment, which has led to inconsistent and unfair decision making across the State with regard to retail investment, including the approval of ad hoc 'out-of-centre' development.

We made three key recommendations to the NSW Government: **(1)** commit to a new Retail Investment Policy, **(2)** establish a working group to develop a new approach, and **(3)** develop and consistently apply a Net Community Benefit Test (NCBT) for retail development proposals. In our view, a consistent NCBT (or, in the language of Harper, a 'public interest test') will help unlock development opportunities in areas targeted for growth in prevailing Government land use strategies (ie. A Plan for Growing Sydney) and also better assess 'out-of-centre' proposals.

Recommendations

1. **The Government should revisit the recommendations of the Competition Policy Review Panel's final report to Government to understand the interactions between Recommendations 8 (Regulatory Review) and 9 (Planning and zoning). The Government should consider the applicability of 'Public Interest Test' with regard to DPA 2.**

4 DPA 1

The SCCA has reviewed the *Existing Activity Centres Policy Review Development Plan Amendment* (DPA 1) in detail. We have focussed our review on the Development Plan areas where our members have assets (Charles Sturt, Marion, Onkaparinga, Playford, Port Adelaide Enfield, Tee Tree Gully, Walkerville and West Torrens). We have also reviewed in detail the accompanying 'Executive Summary' and offer a range of observations and identify a number of concerns about some of the analysis it contains (particularly to the extent that it flags the Government's thinking with regard to DPA 2).

Generally speaking, the Government's initial focus on existing activity centres is welcome. The proposed changes may provide material benefit in the context of development feasibility for a large scale investment, particularly with regard to the standardisation of parking controls, and also streamlining decision making in some circumstances, such as change of use of a tenancy.

We are concerned about some of the commentary on page 9 of the Executive Summary about the desired future use and character of activity centres across Adelaide. Although the SCCA supports the Government's agenda in terms of creating vibrant mixed use communities, we are concerned by the following statement on page 9 of the Executive Summary:

> *"However, shifting the focus for many established activity centres away from commercial and shopping activity seems unlikely in the foreseeable future and it is more probable that many centres, particularly 'higher order' centres, will continue to be regarded for some time yet as destinations for services, business activity and jobs".*

This isn't a sentiment that we fully support. Although we welcome a strategic, planned approach to developing mixed use activity centres, we do not support the wholesale premise of "shifting the focus" of all activity centres, particularly Regional and District Centres, away from a core retail and business function. Doing so could stop some of these so called 'higher order' centres from expanding their retail and business function to satisfy a broader, and growing, population base. This is an important distinction and planning principle that the Government to keep in mind as it progresses through its activity centres review.

The Government should consider the parameters of an appropriate monitoring and evaluation framework to assist the understanding of the benefits of DPA 1 to retail investment in activity centres. In addition to assisting to inform DPA 2, it will also assist to highlight further interventions that may be needed to stimulate activity in existing activity centres. In addition to monitoring actual investments, a qualitative approach based on engaging directly with large scale investors to understand their views should also be considered. The SCCA would be pleased to facilitate engagement with its members which are significant investors across South Australia.

In order for DPA 1 to be make an impact in existing activity centres, the release of DPA 2 should be held off until mid 2017.

We make the following observations with regard to the specific proposals in DPA 1, and a range of other relevant issues flagged the Executive Summary and our earlier submission and the Draft Principles:

Standard car parking range

We support the Government's approach to standardising the application of a car parking range across Development Plans, generally speaking the application of a range between 3 and 6 spaces per 100 square metres of gross leasable floor area. The flexibility proposed responds to the benefits of co-location/proximity of transport infrastructure and shared parking arrangements. It also acknowledges that shopping behaviours (eg. on-line shopping) and other regulatory parameters, such as incremental changes to trading hours, are and will continue to change retail trends.

Of all proposed changes in DPA 1, the standardisation of a car parking range will deliver the greatest potential material development to large scale investment in activity centres. The potential materiality is derived from the potential to avoid costs associated with delivering proportionally high cost parking spaces which may exceed demand.

We urge the Government to revisit each Development Plan in DPA 1 to ensure that any exhibition sequencing issues are appropriately picked up in the final DPA as implemented. For example, we have identified a potential disconnect between the application of the new parking regime in the Tea Tree Gully Development Plan. The amendment currently captures the Regional Centre Zone but, it is our understanding, that this zone was recently superseded by an Urban Core Zone. As such, it would be appropriate for the Urban Core Zone to be listed as a 'Designated Area' in that Council area for car parking purposes.

It is our understanding that, as per the drafting of the amendment, if a proponent meets the minimum parking rate, there are no grounds to justify a Planning Authority insisting on a higher rate of provision. We support this approach.

As such, we were confused by the following statement at page 49 of the Executive Summary:

> *"Planning authorities have capacity to apply a parking rate within the proposed range."*

Although we note that the Executive Summary does not form part of the DPA, this statement is incongruous with our understanding of the intent and application of the amendment and a confusing addition for stakeholders.

Complying development

We support the Government's intention to broaden the scope of complying, or 'as of right', development across existing activity centres and are encouraged that DPA 1's Executive Summary specifically mentions providing "*building owners and centre managers with additional freedoms to adjust tenancy mix in response to changes in local market conditions or fill vacant and underutilised space"* (page 51).

We understand this to mean that, generally speaking, a change of tenancy in a shopping centre in a centre zone would now be considered complying development. Further, these now complying developments would be considered Category 1 and would not require public notification.

Our understanding is that, as drafted, there are no floor space thresholds applied to the use of complying development for a change of tenancy in a shopping centre.

We support this approach.

We note comments on the bottom of page 54 of the Executive Summary seeking feedback on the application of thresholds (eg. 500m^2) and/or imposing conditions regarding the suitability of on-site loading and unloading facilities.

In the context of a change of tenancy within a shopping centre, we do not think it is necessary to impose criteria along the lines of those mentioned and recommend that the amendments as drafted in DPA 1 be maintained

We support the 'switching off' of off-street vehicular parking requirements for a change of use "*in a building (or buildings) comprising multiple tenancies that operate as an integrated complex used primarily for shops...*" (Model complying development provisions, Executive Summary, page 57).

Vacant land and complying development – Executive Summary

We are, however, concerned about the so-called "circumspect" approach the Government suggests it has taken to applying to complying development in "areas with higher levels of vacant land and for larger centre types" (Executive Summary, page 56). (We discuss our specific concerns with the analysis of vacant land at page 10).

The Government, by its own description, seems to have considered the premise of complying development less as a mechanism to improve the efficiency of the planning system in general terms, but to streamline certain types of development – but only in certain locations.

The Government indicates its willingness to restrict the use of complying development in certain areas of existing centre zones even though a retail development in those areas may still, presumably, be approved through a merit assessment process. At the same time, the Government also remains willing to undermine the whole of the activity centres framework by opening up out of centre locations of retail investment in DPA 2.

The Government's motivations in this regard seem incongruous to the motivations behind the preparation of DPA 2.

Floor space caps

Generally speaking, we are supportive of the removal of floor space 'caps' in activity centre zones and understand that this direction is informed by the existing model controls in the South Australian Planning Policy Library (SAPPL) which does not "*envisage the inclusion of desired zone uses as a non complying form of development under any circumstances*" (Executive summary, p. 37).

As noted in our submission to the Draft Principles, however, we are concerned about the proposal to remove floor space limits in the non-centre zones, including Urban Core, Urban Corridor and Suburban Activity Node Zones, due to potential impact on the centres hierarchy.

Our concern in this regard is compounded by the following comment in the Executive Summary:

> *"This DPA provides scope to include other zones that display traits similar to existing centre and shopping zones...the characteristics of traditionally termed centres can be disturbingly elusive and, therefore, makes a comparison to other urban zones difficult."*

The Government should reconsider the proposal removal of caps in non-centre zones. The potential to remove caps in these non-centre zones should, at the very least, be deferred for consideration in the context of DPA 2.

Non-complying development and notification

We are generally supportive of changes to 'switch off' non-complying development and related public notification requirements. We also understand the relationship between these changes and the proposed broadening of the scope of complying development (ie. complying development should be Category 1 development) and the transition from floor space caps to guidance.

Analysis of vacant land

We are concerned about the emphasis the Government has placed on the premise of 'vacant land' in an activity centre as a key element of analysis with regard to DPA 1.

More importantly, we are concerned that the emphasis on vacant land will have a direct – although, in our view, and unsuitable - flow on to the development of DPA 2.

Vacant centre land should not be considered a proxy for development capacity. The potential future growth of an activity centre also needs to be considered with regard to latent development capacity and following the thorough consideration of potentially increasing the development capacity of centres via amended building controls.

The amount of vacant land in an existing activity centre or, more specifically, the assessed lack of vacant land should not simply be seen as grounds to consider out of centre alternatives in DPA 2. Further, some of the changes proposed under DPA 1, such and the standardisation of car parking rates, may also contribute to the 'freeing up' of additional land in existing activity centres.

Our concern is compounded by the following comments on page 36 of the Executive Summary:

> *"Different techniques would need to be considered to establish the potential capacity to accommodate additional services and facilities in existing built up areas including building / tenancy vacancy levels and the underutilisation of occupied land. These are not matters being specifically addressed in this DPA..."*
>
> *"However, such matters are relevant to the wider centres and shopping review and **may** be considered further in preparing the subsequent DPA".*

The Government should not be using a blunt measure, such as the amount of vacant land, as a measure of the 'need' for or 'opportunities' under DPA 2. This would be a lazy approach to which would see the Government buckle to the special interests which want access to:

> ***"...large, cheap sites rather than close links to housing and other commercial / business activities"*** *(Executive Summary, p. 22).*

(The above comment was made in the in a description of the "factors influencing" the selection of sites for bulky goods. In our view, it is outrageous that the Government, in progressing DPA 2, appears to have been convinced that this is a valid motivation in identifying sites, particularly when our members are forced to locate in high value centres – as per long standing Government policy – achieve high design standards, and contribute to the public domain).

In light of the revealing comments above, we seek a commitment from the Commitment that issues of development capacity – not just land vacancy - including opportunities to increase the development capacity in relevant existing activity centres, **will be** considered **prior to** or, at the very least, in the context of DPA 2 (further comments provided at section 5).

Previous recommendations

DPA 1 has not contemplated a number of recommendations the SCCA made in it submission to the Draft Principles with regard to facilitating development in existing activity centres.

Specifically:

- The ability to provide controlled parking, and
- Removing requirements for a proponent to deliver public infrastructure (eg. bus interchanges and pedestrian linkages) on private land, particularly when their location has been strategically identified due to presence of public infrastructure (ie. TODs).

We would welcome the opportunity to discuss these recommendations with Government prior to the completion of DPA 1.

Recommendations

2. **The Government should evaluate the impact of DPA 1 against its own reform objective of stimulating investment in existing activity centres. This should include a qualitative engagement process with major investors in South Australia.**

3. **Ensure that the changes outlined in DPA 1 are given sufficient time to be rolled-out and evaluated so as to appropriately inform the parameters of DPA 2. The earliest that DPA 2 should be released for consultation is mid-2017.**

4. **DPA 1 amendments should be revisited on a council by council basis to ensure that discrepancies in the application of, for example, new car parking standards as a result of unrelated local development plan amendments, are picked up (eg. Tee Tree Gully).**

5. **Existing drafting of the complying development provisions should be retained; no floor space threshold should be applied to the application of complying development for a change of tenancy within a shopping centre.**

6. **The Government should reconsider removing floor space caps in non-centre zones eg. Urban Core and Suburban Activity Node Zones. At the very least this should be deferred for consideration in the context of DPA 2, and with due recognition of the existing centres hierarchy.**

7. **Ensure that development capacity – not just land vacancy - including opportunities to increase the development capacity in relevant existing activity centres, will be considered prior to or, at the very least, in the context of DPA 2.**

8. **Revisit the previous recommendations made by the SCCA to the Draft Principles which have not been addressed in DPA 1.**

5 'DPA 2'

Page 5 of DPA 1's Executive Summary makes the following statement:

> *"In particular, this DPA seeks to ensure incumbent and new businesses can progress project with greater confidence in activity centres."*

We are concerned that the Government's policy approach may be self-defeating in so far as the potential benefits of DPA 1 may be 'cancelled out' by proposals in DPA 2.

The SCCA remains extremely concerned about the timing and content of DPA 2. Our concerns were detailed in our submission to the Draft Principles, including our view that the Government may be willing to relax its long held and successful strategic planning approach regarding activity centres to satisfy the requests of so-called, new entrants or formats.

Our submission the Draft Principles also detailed a range of parameters which think are essential for the Government to consider in the preparation of DPA 2, including (in summary):

- A strict site sequential test approach to site identification,
- That an out of centre development would deliver a net benefit to the community,
- That out of centre retail developments should be master planned and have an associated infrastructure plan which also demonstrates how the development would catalyse a new activity centre.

In 'picking winners' via DPA 2, we are also the Government will create an un-level playing field for retail investment by giving favourable land-use, development assessment or development conditions or considerations to one type of retail format or entrant over another.

In light of the analysis which has been undertaken to inform the Executive Summary for DPA 1, particularly the focus on vacant land, we are also concerned about the metrics that the Government is choosing to look at when determining to the appropriateness of interventions conceived under DPA 2.

By way of example, we are concerned that the Government's approach will be as blunt as looking at an activity centre which has minimal vacant land and deciding that the relaxation of rules around out of centre development would be appropriate in that area. There is nothing in DPA 1, or the earlier Draft Principles document which gives us comfort that the Government won't adopt flawed analysis or progress unsuitable outcomes in this regard.

The Government will need to give serious consideration to the elements of an appropriate transition strategy – and associated communication strategy - upon the **release and implementation** of DPA 2. This will be critical to ensuring that planned investment in existing activity centres, including the process of securing anchor tenants, is not undermined by the 'options' flagged under DPA 2 (ie. in the words of the Executive Summary, access to "***large, cheap sites rather than close links to housing and other commercial / business activities"*** *(Executive Summary, p. 22).*

Considering the risk to our members investments, the SCCA would like to be engaged by the Government in the preparation of a transition strategy associated with DPA 2.

Recommendation

9. **Ameliorate the risks associated with the release and implementation of DPA 2, including by preparing a transition strategy to ensure that planned investment in existing activity centres is not undermined. The SCCA should be engaged in this process.**

6 SHOPPING CENTRE COUNCIL OF AUSTRALIA

The Shopping Centre Council of Australia (SCCA) represents Australia's major shopping centre owners, managers and developers. Our members own and manage shopping centres from the very largest ('super-regional') centres to the smallest ('neighbourhood') centres in cities and towns in every state and territory.

Our members own and manage billions of dollars of retail assets in South Australia, including the State's six largest shopping centres. In these centres alone, there is over 400,000m^2 of retail floor space and around 1,200 retailers. In 2014 these centres collectively generated turnover of around $2.5 billion.

Our members are AMP Capital Investors, Blackstone Group, Brookfield, Charter Hall Retail REIT, DEXUS Property Group, Eureka Funds Management, Federation Centres, GPT Group, ISPT, Ipoh Management Services, Jen Retail Properties, JLL, Lancini Group, Lendlease Retail, McConaghy Group, McConaghy Properties, Mirvac, Perron Group, Precision Group, QIC, Savills, SCA Property Group, Scentre Group (owner and operator of Westfield shopping centres in Australia and New Zealand) and Stockland.

The SCCA would be happy to discuss any aspect of this submission. Please do not hesitate to contact:

Kristin Pryce
Senior Adviser
Shopping Centre Council of Australia
Level 1, 11 Barrack Street
SYDNEY NSW 2000
Phone: 02 9033 1941
Email: kpryce@scca.org.au

Angus Nardi
Executive Director
Shopping Centre Council of Australia
Level 1, 11 Barrack Street
SYDNEY NSW 2000
Phone: 02 9033 1930
Email: anardi@scca.org.au