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Sent: Monday, 27 November 2023 3:06 PM
To: TPC Enquiry
Cc: David Morris; Barlund, Paola
Subject: [230427] Devonport LPS - Draft Amendment AM2022.02 and Permit PA 2022.0024 - Stony Rise
Attachments: Correspondence to TPC 27.11.2023.pdf

Good Afternoon,

Devonport LPS - Draft Amendment AM2022.02 and Permit PA 2022.0024 - Stony Rise

Please find **attached** correspondence in relation to the above matter.

Kind regards,

Robert Holbrook
Associate

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Contact: David Morris / Robert Holbrook

Our Ref: DJM:RJH:230427

27 November 2023

Mr Roger Howlett
Delegate (Chair)
Tasmanian Planning Commission
GPO Box 1619
HOBART TAS 7001

By Email: tpc@planning.tas.gov.au

Dear Mr Howlett,

Devonport LPS - Draft Amendment AM2022.02 and Permit PA 2022.0024 - Stony Rise

1. As the Commission is aware, this firm acts for Tipalea Partners in this matter. In summary, the purpose of this correspondence is to:
 - (a) Provide new information and an outline of our client's position in relation to that for the purposes of the upcoming hearing in this matter; and
 - (b) Advise the Commission and representors that our client seeks to withdraw and no longer rely on the permit that accompanies the draft amendment.

New Information

2. As foreshadowed in our letter to the Commission of 7 July 2023, in order respond to the issues that have been raised by the Commission delegates and the representors at the hearing on 15 and 16 June 2023, our client files the **attached** statements of evidence of Ms Riley and Mr Davies dated 24 and 21 November 2023 (respectively).
3. It is submitted that this further information can and should be considered at the resumption of the hearings currently listed for 12 to 14 December 2023.
4. In summary, for the reasons generally set out in Ms Riley's statement of evidence, our client's primary position that it will be urging the Commission to adopt at the conclusion of the hearings is to modify the draft amendment¹ to:

¹ As certified by the Planning Authority dated 24 October 2022.

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-
- (i) Remove the spatial application of the DEV S1.0 Devonport Regional Homemaker Centre Specific Area Plan from 5 Friend Street, 88 Stony Rise Road and 90-102 Stony Rise Road (together the 'Site'). This would result in reliance on the existing controls provided by the underlying 17.0 Commercial Zone of the State Planning Provisions for the Site; and
 - (ii) Retain the existing DEV2.0 Devonport Homemaker Service Industrial Centre Specific Area Plan over 1 Friend Street, Stony Rise.
 5. The evidence of Ms Riley and Mr Davies, **attached** to this correspondence, is relevant to determining whether modifications ought to be made to the draft amendment in accordance with the relevant provisions of the *Land Use Planning and Approvals Act 1993* ('Act'), including section 40M(1)(d).
 6. Our client intends to provide detailed submissions to the Commission in relation to this, noting that such modifications are common and allow the Commission and the parties to respond to matters raised at the hearings and ensure that a draft amendment meets the relevant LPS criteria provided in section 34(2) of the Act. For the avoidance of doubt, our client's position is that the modifications set out in Ms Riley's evidence are properly characterised as 'modifications' and can be dealt with by the Commission on that basis.
 7. The Commission's directions of 11 August 2023 indicate that "*items regarding planning merit have been completed at the hearing. Should the parties wish to raise these matters again, this can be done as final submissions.*"
 8. Subsequent correspondence from the Commission dated 15 November 2023 provided:

"If you intend relying on new or additional material, it must be emailed no less than seven days before the hearing. It is important to observe this process so that the Commission and the parties can read the documents prior to the hearing."
 9. The new material from Ms Riley and Mr Davies has been provided 15 days before the hearing. To the extent that any application to re-open is considered necessary in the circumstances (which is disputed), the following submissions are provided in support:
 - (a) It is trite to observe that the Commission has a very wide discretion in relation to the content of planning schemes, as it operates at the top of the hierarchy of authorities responsible for land and resource planning management within Tasmania;²
 - (b) As a result, the Commission has a duty to make the correct or preferable decision in this matter.³ Because of that duty, it will sometimes be

² See, eg, *Attorney-General v University of Tasmania* [2020] TASFC 12 at [62].

³ See, eg, *Commissioner of State Revenue v Melbourne's Cheapest Cars Pty Ltd* [2018] TASSC 47 at [16] which are apposite to the duty of the Commission.

appropriate, such as here, for the Commission to take on an inquisitorial role;⁴

- (c) At a hearing the Commission is not bound to act in a formal manner;⁵
- (d) However, the Commission must consider information obtained at hearings – which should properly include the statements from Ms Riley and Mr Davies;⁶
- (e) The Commission must always comply with the rules of natural justice before the making of a decision (and not only during or in relation to a hearing);⁷
- (f) The duty to afford natural justice is flexible and variable, and depends on the circumstances of the case - including the nature of the inquiry, the subject matter and rules under which the Commission is acting;⁸
- (g) Having given due consideration the various matters raised by the Commission delegates and representors at the hearing on 15 and 16 June 2023, procedural fairness requires our client (as an entity who would be most affected by any decision) be afforded the reasonable opportunity to present its case in response;⁹
- (h) While the duty to afford natural justice does not extend to ensuring that our client take the best advantage of the opportunity to which it is entitled, any decision that deprives our client the reasonable opportunity to present its case, including relying on the new statements filed, would be procedurally unfair;¹⁰
- (i) Accordingly, our client ought not be denied the opportunity to file the **attached** evidence and make arguments to the Commission in relation to that, else it would be unreasonably deprived of the possibility of a successful outcome;¹¹ and

⁴ See, eg, *Attorney-General v University of Tasmania* [2020] TASFC 12 at [62]. *Tomaszewski v Hobart City Council (No 2)* [2021] TASSC 15 at [16] which are similarly apposite to the Commission, noting this is effectively enshrined in s 10(1) of the *Tasmanian Planning Commission Act 1997* ('**TPC Act**'). See, also, *Attorney-General v University of Tasmania* [2020] TASFC 12 at [84]-[86].

⁵ TPC Act s 10(1)(b)(iv).

⁶ Act s 40M(1)(b).

⁷ See, eg, *Attorney-General v University of Tasmania* [2020] TASFC 12 at [43] & TPC Act s 10(1)(b)(v).

⁸ See, eg, *Attorney-General v University of Tasmania* [2020] TASFC 12 at [43].

⁹ See, eg, *Attorney-General v University of Tasmania* [2020] TASFC 12 at [45].

¹⁰ See, eg, *Attorney-General v University of Tasmania* [2020] TASFC 12 at [48].

¹¹ See, eg, *Minister for Immigration and Border Protection v SZMTA* [2019] HCA 3 at [2], 264 CLR 421, as discussed by Geason J in *Attorney-General v University of Tasmania* [2020] TASFC 12 at [99]-[102]. That Geason J was in dissent as to the ultimate outcome of the appeal does not affect the validity of his observations on this point.

- (j) Any general prejudice claimed to be suffered by parties in this matter can be appropriately dealt with by the Commission as part of this hearing process.

Reliance on the Permit

10. We are instructed that our client seeks to withdraw and no longer rely on the permit that accompanies the draft amendment. Accordingly, in our view it is not necessary for the Commission to conduct a merits-based assessment of that permit application as part of this hearing.
11. As there is no formal process under the Act for our client to seek to withdraw its permit application, in the circumstances we will be submitting that the Commission ought to refuse the permit in accordance with section 42B(1)(b)(i) of the Act. We note that is the course adopted by the Tasmanian Civil and Administrative Tribunal in similar circumstances and is equally appropriate here.

We note this correspondence has also been provided to representatives of the Planning Authority, Mr Spence SC and Ms Lightfoot on behalf of Goodstone Pty Ltd and Ms Brooks on behalf of Yvonne Rundle and David Yaxley.

In the event there is any issue in relation to the matters raised in this correspondence, it is submitted that it can properly be dealt with at the resumption of the hearing.

Yours faithfully,

SIMMONS WOLFHAGEN

Per:



and

Counsel for Tipalea Partners

STATEMENT OF EVIDENCE

IN THE TASMANIAN PLANNING COMMISSION

REFERENCE NUMBER: AP-DEV-AM2022.02

PLANNING AUTHORITY Devonport City Council

APPLICANT: GHD Ltd obo Tipalea Partners

AUTHOR: Emma Riley

FIELD OF EXPERTISE: Town Planning

FILED ON BEHALF OF: Applicant (Tipalea Partners)

DATE: 24 November 2023

AP-DEV-AM2022.02

Stony Rise Village

Statement of evidence | 24 November 2023

ERA Planning and Environment acknowledge *palawa* as the Traditional Owners of *lutruwita* (Tasmania). They are the original custodians of our land, sky and waters. We respect their unique ability to care for country and deep spiritual connection to it.

We honour and pay our respect to Elders past and present, whose knowledge and wisdom has and will ensure the continuation of culture and traditional practices.

We acknowledge that their sovereignty has never been ceded.

Always was, always will be.

ERA Planning Pty Ltd trading as ERA Planning and Environment

ABN 67 141 991 004

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Job Number: 2324-023

Document Status

Document Version	Date	Author	Reviewer
Final V2	24 November 2023	Emma Riley	Clare Hester

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1 Introduction

1.1 Preliminary statement

- 1.1.1 I, Emma Riley, Director of ERA Planning and Environment, Hobart am the author of this statement of evidence.
- 1.1.2 I am a qualified and practising town planner with a Bachelor of Environmental Design and Graduate Diploma of Environmental Studies (Hons) from the University of Tasmania, a Graduate Diploma of Urban and Regional Planning from the University of New England and Graduate Certificate in Business Administration from RMIT University.
- 1.1.3 I am a fellow of the Planning Institute of Australia and a Registered Planner. I am a current Director of the Planning Institute of Australia and national vice-president.
- 1.1.4 I have over 23 years' experience working as a planner in Tasmania. During this time, I have experience with planning assessments on a broad range of project types and locations across the State. I have appeared by the Tasmanian Planning Commission many times. My CV is at Appendix C.
- 1.1.5 I have been instructed by Simmons Wolfhagen on behalf of the Tipalea Partners in this matter to provide expert evidence in regard to strategic planning justification for the scheme amendment component of the combined amendment and permit request.
- 1.1.6 I have read the Code of Conduct for expert witnesses set out in Practice Note No. 14 by the Tasmanian Planning Commission and agree to be bound by it.

1.2 Declaration

- 1.2.1 In preparing this statement of evidence I have visited the site and made all enquiries which I believe are desirable and appropriate and no matters of significance that I regard as relevant have, to my knowledge, been withheld from the Tasmanian Planning Commission. The opinions expressed are my professional opinions and are honestly held.



Signed:

Dated: 21 November 2023

2 Background

2.1 The draft amendment

2.1.1 GHD Ltd submitted a request to Devonport City Council (Council) for a combined planning scheme amendment and planning permit application in May 2022 that sought the following:

- The rezoning of three parcels of land from Commercial Zone to Particular Purpose Zone. The two parcels are land contained in C.T 167737/15 (known as 5 Friend Street, Stony Rise), C.T. 173536/16 (known as 90-102 Stony Rise Road, Stony Rise) and C.T. 173536/17 (known as 88 Stony Rise, Stone Rise) as shown in Figure 1.
- Removal of the existing Clause DEV-S2.0 Devonport Homemaker Service Industrial Centre Specific Area Plan for the Devonport LPS (ordinance and maps). This existing specific area plan applies to the land contained in Figure 2.
- Consequential amendments to planning scheme maps so that the spatial extent of the existing Clause DEV-S1.0 Devonport Regional Homemaker Centre Specific Area Plan did not include the land to be rezoned to Particular Purpose.

2.1.2 As part of their certification process, Council modified the planning scheme amendment component so that the Draft Amendment as certified sought the following:

- The replacement of the existing Clause DEV-S1.0 Devonport Regional Homemaker Centre Specific Area Plan with an amended version¹ with an extended application area to include the land currently subject to DEV-S2.0 Devonport Homemaker Service Industrial Centre Specific Area Plan.
- The deletion of DEV-S2.0 Devonport Homemaker Service Industrial Centre from the Devonport Local Provisions Schedule (LPS).

2.1.3 The result of the certified Draft Amendment was that all the land currently in the Commercial Zone at Stony Rise (as shown in Figure 3) would be subject to the updated specific area plan: Clause DEV-S1.0 Devonport Regional Homemaker Centre Specific Area Plan.

2.1.4 The Draft Amendment request was accompanied by a permit application for the 'Stony Rise Village'. This proposed use and development comprises:

- A supermarket of just over 4,100m²
- Four retail tenancies of around 200m² each
- Medical centre
- Veterinary centre
- Six food services tenancies of around 80m² each
- A car and dog wash
- Laundromat
- A bulky goods tenancy
- Associated facilities and amenities including storage, toilets, and circulation spaces.

2.1.5 The permit application was supported by Council in their Section 40F report subject to conditions and a draft permit was issued and placed on exhibition along with the Draft Amendment as certified.

¹ This was instead of the requested Particular Purpose Zone.

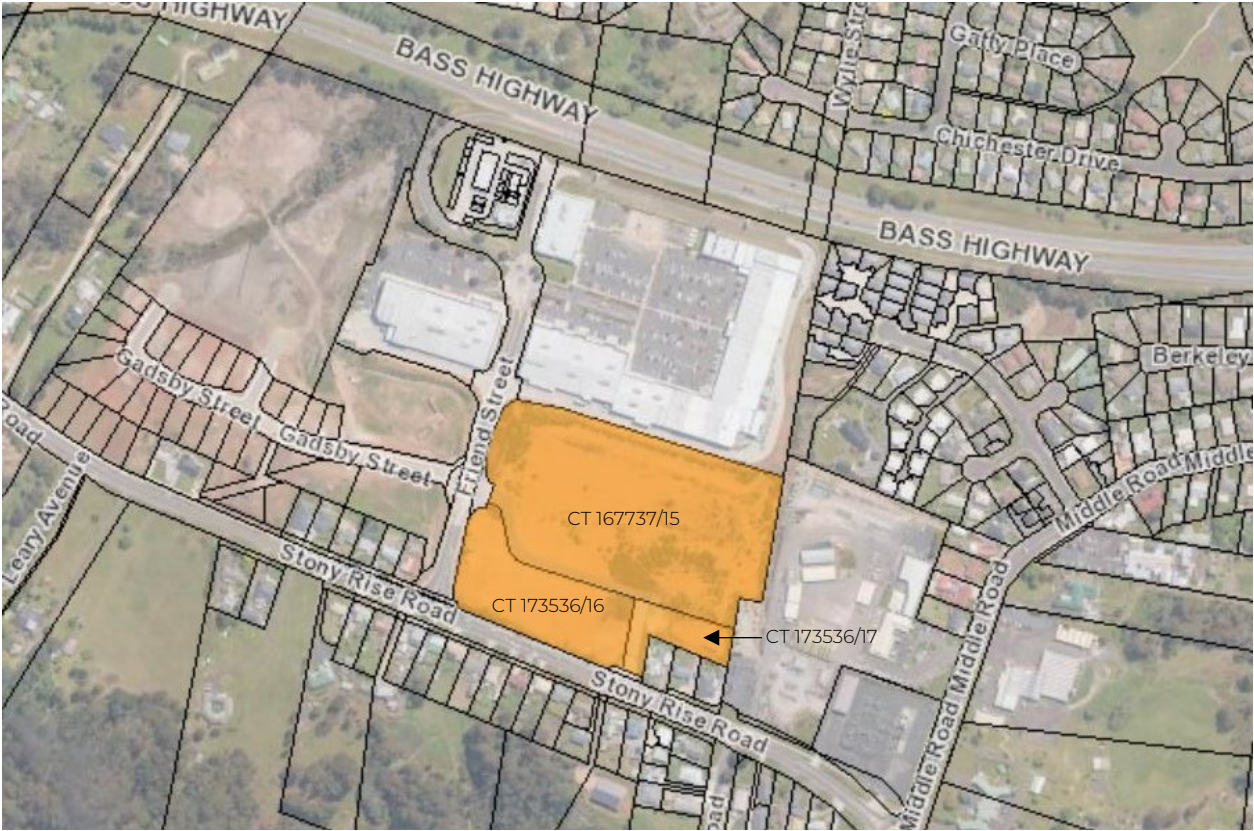


Figure 1 Sites to be rezoned to Particular Purpose under amendment request.



Figure 2 Sites where Clause DEVS2.0 was to be removed and included in the boundaries applicable to Clause DEVS1.0.

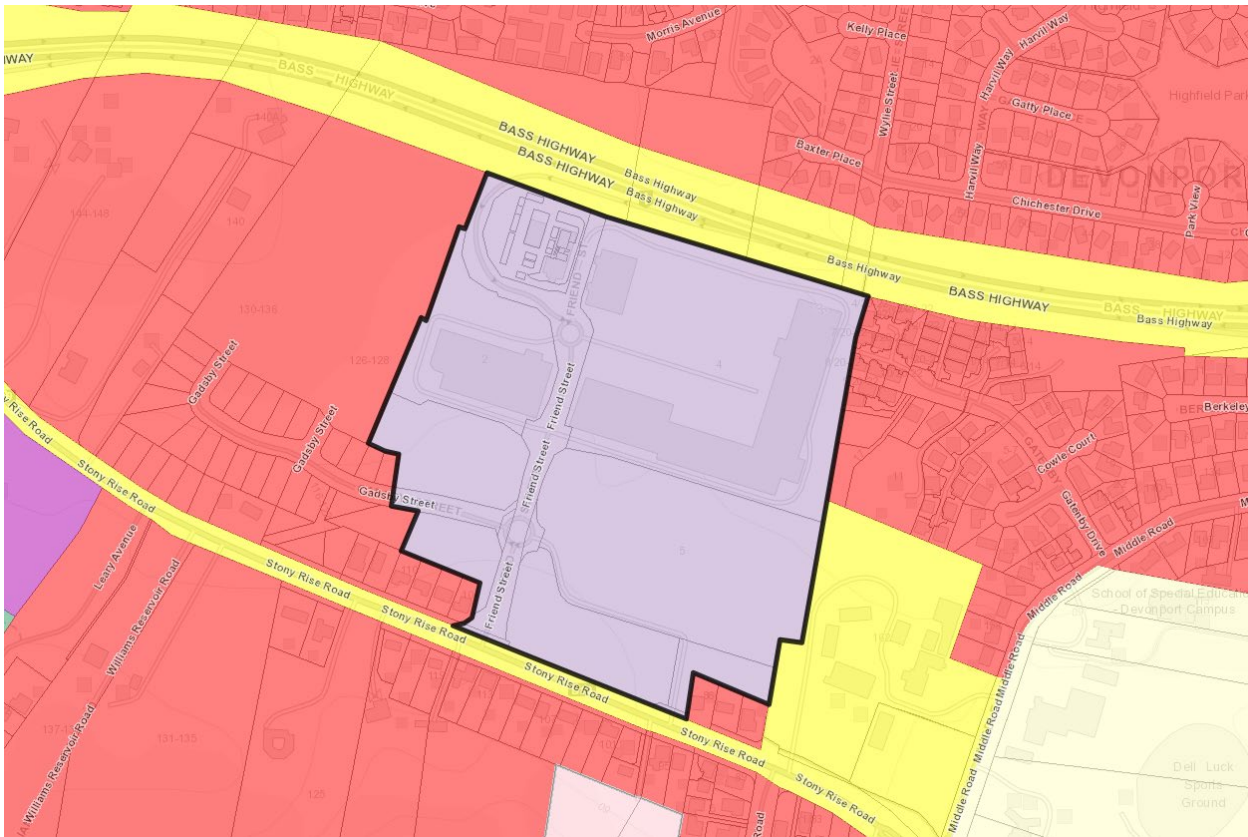


Figure 3 Area of land subject to the Clause DEVS1.0 as amended under the Draft Amendment as certified.

2.2 Basis of this evidence

2.2.1 For the purposes of preparing my evidence, I am proceeding on the basis that the Draft Amendment should be further modified to the following effect:

- The land shown in Figure 1 is removed from the area to which Clause DEV-S1.0 Devonport Regional Homemaker Centre Specific Area Plan applies, so that land solely relies on the provisions of the Commercial Zone going forward. I will refer to the land in Figure 1 across the rest of my evidence as 'Stony Rise Village'.
- The existing Clause DEV-S1.0 Devonport Regional Homemaker Centre Specific Area Plan would otherwise remain as existing.
- Clause DEV-S2.0 Devonport Homemaker Service Industrial Centre Specific Area Plan is retained as existing or is similarly treated to the area in Figure 1, although this is not the focus on my evidence and I have not addressed any issues raised to date in relation to that land.

2.2.2 I address the strategic justification for the proposed modification outlined at paragraph 2.2.1 at section 5 of my evidence.

2.2.3 These proposed changes in my opinion still align with the intent of the amendment request and are not so different that they can not be dealt with through a modification process. This is evident by the analysis between the Commercial Zone provisions and the existing SAP as outlined in Appendix A and discussed at paragraph 5.2.2 of my evidence.

2.2.4 In the alternative the Draft Amendment for the purposes of preparing my evidence, I note that the Draft Amendment could be further modified so that:

- A further modified Clause DEV-S1.0 Devonport Regional Homemaker Centre Specific Area Plan is applied to the land contained in Figure 4 and as listed in Table 1. This alternative SAP is provided at Appendix B.
- Clause DEV-S2.0 Devonport Homemaker Service Industrial Centre Specific Area Plan is retained as existing.

2.2.5 This alternative modification is presented should it be considered desirable to retain some unique provisions to the site. However, in my opinion, the reasons for specific provisions being required on the site no longer exist, following the implementation of the Tasmanian Planning Scheme (TPS). I address this further at section 5.2 of my evidence.

2.2.6 I am also proceeding on the basis that the permit application is to be withdrawn and a new permit application submitted directly to Devonport City Council at a later date, should the planning scheme amendment request be successful.

2.3 Site history

2.3.1 There is a long history of scheme amendments relevant to the site. It is important to consider past decisions to understand the intent and context within which the current provisions have been made.

2.3.2 The Devonport Homemaker Centre was initially created in 2009 by an amendment to the *Devonport and Environs Planning Scheme 1984* (AM 2008/01). The amendment provided restrictions over the kinds of showrooms that might be established so that the centre would be used predominantly for bulky goods sales. The Homemaker area covered the northern half of the area currently zoned Commercial.

- An amendment was approved (AM 2011/03) to expand the zone further south and add the Service Industrial Zone. Economic justification for the expansion was based on the findings of the Devonport Retail Study 2007.
- An amendment was approved (AM 2011/05) to include pet supplies as an additional activity and modify the definition of showrooms.
- An amendment was rejected (AM 2012/02) which sought further changes to the definition of showroom and reduce the minimum tenancy size.
- An amendment was approved (AM 2014/05) to reduce the front setback on Stony Rise Road. This amendment was combined with development for lot consolidation which was meant to facilitate a future showroom closer to the road, but never eventuated.
- An amendment was approved (AM 2020/03) to exclude food services from the floor area minimum and was combined with a development for a McDonalds restaurant.

2.3.3 The number of amendments at the site since creation of the SAP suggest that the current standards do not provide suitable flexibility to enable dynamic responses to market demands which still meet the overall purpose of the SAP.

2.3.4 It is also important to note that the provisions of Clause DEV-S1.0 Devonport Regional Homemaker Centre Specific Area Plan were subject to Schedule 6 of the *Land Use Planning and Approvals Act 1993* (the Act) at the time that the Devonport LPS came into effect and therefore was not subject to assessment under the LPS criteria at section 32 of the Act.

2.3.5 The primary purpose for the SAP has remained consistent over time, being for the delivery of a variety of large format retail offerings.

3 Context

3.1 About Devonport

- 3.1.1 It is firstly necessary to explore how Devonport is growing and changing in order to set the context for strategic need around retail and commercial zoned land.
- 3.1.2 Devonport is one of two cities in the Cradle Coast region. The other is Burnie. This is recognised in the Cradle Coast Regional Land Use Strategy (Regional Land Use Strategy). While growth in the cities along with other parts of the region have well exceeded the expectations of the Regional Land Use Strategy, these two cities continue to retain primacy as the major urban centres for the region. This is important to understand as demand for retail and commercial zoned land primarily arises from population growth.
- 3.1.3 The Regional Land Use Strategy was premised on the basis of the relatively low population growth projections. Actual growth has been considerably greater as shown in Table 1 below, with four LGAs already exceeding the expected growth as highlighted in green. The difference between projected and actual is significant in all these LGAs.

Table 1 Comparison of projected growth in Regional Land Use Strategy from 2008 to 2030 compared to actual growth between 2006 to 2021 based on ABS census

Local Government Area	Projected growth to 2030 (no. of persons)	Actual growth 2006-2021 (no. of persons)
Burnie	2,502	861
Central Coast	-457	2,097
Circular Head	437	165
Devonport	1,245	2,139
Kentish	1,686	841
King Island	-132	-22
Latrobe	2,590	3,790
Waratah-Wynyard	-442	889
West Coast	46	-743

- 3.1.4 Changes across census periods for each LGA in the Cradle Coast region is further explored in Table 2. Devonport LGA has seen an 8.91% increase in population from 2006 to 2021, while the adjoining Latrobe LGA nearly doubled its population with a 43.92% increase. The other adjoining Central Coast LGA has seen a 10.15% increase.
- 3.1.5 Except for Latrobe which has seen more consistent growth over the past 4 census periods, the strongest growth period has been between 2016 – 2021, including in Devonport and Central Coast.
- 3.1.6 It is clear, that key areas in the Cradle Coast region and particularly those relevant to this Draft Amendment have seen stronger growth than what was expected when the Regional Land Use Strategy was prepared.
- 3.1.7 The population increase in the Latrobe LGA is important to note as commercial and retail facilities in the Devonport LGA also serve people living in that area, particularly given the township of Latrobe has limited retailing.

Table 2 Population change across census periods for LGAs in the Cradle Coast region

	2006	2011	% dif.	2016	% dif.	2021	% dif.	Total inc.	Total inc as %
Burnie	19,057	19,329	1.43%	18,895	-2.25%	19,918	5.41%	861	4.52%
Central Coast	20,663	21,355	3.35%	21,362	0.03%	22,760	6.54%	2,097	10.15%
Circular Head	7,952	7,977	0.31%	7,926	-0.64%	8,117	2.41%	165	2.07%
Devonport	24,011	24,615	2.52%	24,696	0.33%	26,150	5.89%	2,139	8.91%
Kentish	5,762	6,086	5.62%	6,128	0.69%	6,603	7.75%	841	14.60%
King Island	1,639	1,566	-4.45%	1,585	1.21%	1,617	2.02%	-22	-1.34%
Latrobe	8,630	9,833	13.94%	10,699	8.81%	12,420	16.09%	3,790	43.92%
Waratah-Wynyard	13,411	13,708	2.21%	13,578	-0.95%	14,300	5.32%	889	6.63%

- 3.1.8 In addition to population growth, Devonport LGA is also a key tourism centre as the home port of the Spirit of Tasmania.
- 3.1.9 From 2008 to 2019 (pre-COVID), the number of visitors (interstate and international) to Tasmania increased from 0.8 to 1.3 million people (Tasmanian Visitor Survey). Following a significant drop due to COVID restrictions, visitor numbers for the year ending June 2023 had increased back to 1.2 million.
- 3.1.10 Tasmania has three key entrances for visitors: Hobart airport, Launceston airport and the Spirit of Tasmania (Devonport). Visitor arrivals on the Spirit vessels at the Port of Devonport has also seen a significant increase. According to the Tasmanian Visitor Survey there was a 36.95% increase in the number of visitors arriving through the Port of Devonport².
- 3.1.11 The two new Spirit of Tasmania ships are expected to be delivered in the second and last quarter of 2024 and will provide a 59.8% increase in vehicle lane metres (TT Line, 2023) that are flexible in accommodating passenger and freight vehicles.
- 3.1.12 The vehicle lanes provide extra height to fit caravans and motorhomes which will see a reduction in the current lane capacity limitations for large vehicles. It is expected that an additional 78,000 visitor vehicles per year will cross through the Port of Devonport by 2030, with approximately 19,000 motorhomes and caravans in total by 2030.
- 3.1.13 The Tourism Tracer data shows that visitors arriving on the Spirit of Tasmania stay longer, disperse more throughout the State, and consequently spend more.

² YT March 2015: 118,027 visitors (via sea) from a total 1,105,193 visitors, thus equating to 10.68% of all visitors. YT March 2023, 161,643 visitors (via sea), from a total 1,305,404 visitors, thus equating to 12.38% of all visitors.

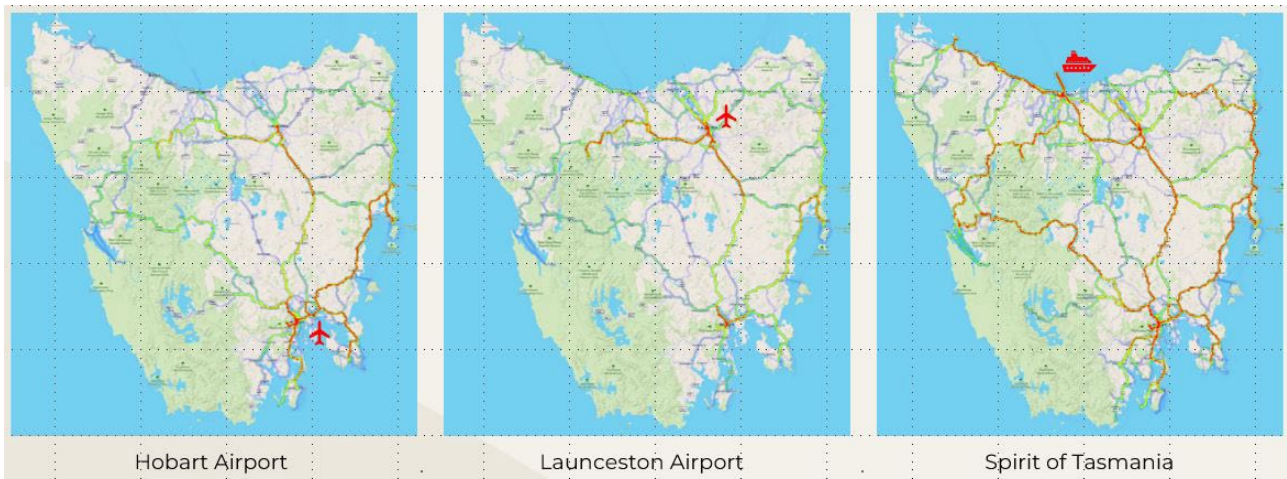


Figure 4 Visitor dispersal mapping available from the Tourism Tracer project

- 3.1.14 Motorhome and caravan visitors have food retailing needs that will need to be satisfied on entering Tasmania, due to biosecurity restrictions. This has been considered by Mr Ellis Davies in his evidence.
- 3.1.15 In summary, Devonport LGA has seen significant growth over the past 10 to 15 years and a significantly different outlook for the next 10 to 15 years than informed previous planning decisions relating to the Devonport Homemaker Centre (see section 2.3).

3.2 Existing activity centres

3.2.1 The Devonport CBD is the primary activity centre for the Devonport LGA. I understand that Council has identified a draft activity centre hierarchy that takes into account how each activity centre currently functions. This was prepared taking into account background provided by the Southern Tasmania Regional Land Use Strategy and the Tasmanian Activity Centre Network³. The draft activity centre hierarchy is outlined in Table 3.

Table 3 Draft activity centre hierarchy prepared by Devonport City Council

Activity centre type	Locations
Primary activity centre	Devonport CBD (including Fourways)
Local suburban centre	East Devonport, Spreyton
Peripheral activity centre	William Street (south of Fourways), Don Road, Formby Road
Local neighbourhood centre	Valley Road, Forbes Street, Southern East Devonport
Specialist centres	Devonport Homemaker Centre

3.2.2 Activity centres provide the focus for services, employment and social interaction in cities and towns. An activity centre network is a way to provide for a planner a defined hierarchy to ensure complementarities and efficiencies. There is also other benefits in terms of aligning with the residential growth strategies as well as transport and other infrastructure planning, plus supporting agglomeration economies, thereby maximising economic outcomes.

³ This was a state wide activity centre hierarchy prepared by the Tasmanian Planning Commission, but was never formally adopted or integrated into the planning system.

- 3.2.3 While higher order activity centres pull people in for work and higher order shopping needs, it is also desirable from a strategic planning perspective that a network of smaller centres are in spatially appropriate locations to support daily needs of residents. This helps create a sense of community, walkable residential communities, and less transport disadvantage.
- 3.2.4 In the case of the Cradle Coast region, this has heightened importance in my opinion, since unlike Northern and Southern Tasmania, there is not one single metropolitan area which has a reasonable public transport network.
- 3.2.5 In other words, in my opinion sound strategic planning does not 'put all the eggs in one basket' when it comes to establishing and protecting an activity centre network and once an urban settlement achieves a certain size, it is very reasonable and appropriate that there are multiple activity centres of varying scales across a single hierarchy/network.
- 3.2.6 Defining the role and function of activity centres, assists in understanding the type of services and activities that should occur is also important in my opinion, noting there can often be some variations between like activity centres. For example, in the Cradle Coast region, although Burnie and Devonport CBDs are realistically at the same level on the hierarchy, Burnie has regional civic functions, like the presence of Tasmanian courts, that Devonport does not.
- 3.2.7 While undertaking this exercise at a regional level is beyond the scope of any individual scheme amendment request, it is useful in my opinion to examine existing activity centres around Devonport LGA and examine their zone of influence (see Figure 5). I am currently involved in similar exercises as part of the Burnie and Circular Head Settlement Strategy projects which ERA Planning and Environment are assisting in the preparation of. I was also involved in the development of the updated Central Coast Local Area Settlement Strategy. I
- 3.2.8 In my opinion there is a strong inter-relationship between some settlements in the Cradle Coast region. Devonport as one of two cities has a catchment that encompasses adjoining LGAs. The degree of interdependency varies but exists nonetheless and is recognised in the regional land use strategy at page 71 and 72 which described the situation as follows:
- The arrangement of established settlement between Port Sorell and Wynyard means these places tend to function in many respects as a collective activity centre....Settlements at locations such as Port Sorell, Penguin, and Somerset each contain a moderate-sized residential population. While these centres may be relatively self-sufficient in daily need and convenience services, they are not sufficiently diverse in function to be considered individual district centres. They are each closely aligned and dependent on larger centres at Devonport, Ulverstone and Burnie respectively.*
- 3.2.9 For example, residents living in the Central Coast LGA work in Devonport and would travel are likely to use retail options in Devonport LGA to meet their needs, particularly if it is convenient from work. Residents living in Latrobe and Sheffield would also travel into Devonport to meet particular retail needs, given the limited range of options in their LGAs.
- 3.2.10 The zone of influence is a spatial representation of where each activity centre pulls people from, on a daily basis, although it is important to note that on an occasional basis people, may travel outside of that zone of influence.
- 3.2.11 As mentioned above Burnie and Devonport CBDs are the highest order activity centres in the Cradle Coast region. The zone of influence of these two centres is shown in Figure 5 and aligns with the journey to work data from the ABS Census 2021 as shown in Table 4.
- 3.2.12 It should be noted that the journey to work data reflect all jobs available in an LGA and because of the nature of economic activity in the Cradle Coast region, it is likely a reasonable proportion of jobs available in each LGA are outside of retail and business areas in industrial and rural/agricultural areas.

Table 4 Journey to work data ABS Census 2021

		Place of work									
		Burnie	Central Coast	Circular Head	Devonport	Kentish	King Island	Latrobe	Waratah-Wynyard	West Coast	Total
Place of residence	Burnie	6,150	500	73	321	22	3	82	925	108	8,184
	Central Coast	2,002	4,444	25	1,847	83	0	444	265	86	9,196
	Circular Head	95	8	3,188	3	7	0	3	98	21	3,423
	Devonport	523	987	10	6,910	194	0	1,381	93	54	10,152
	Kentish	67	197	6	875	984	0	278	30	23	2,460
	King Island	0	0	0	0	0	756	0	0	0	756
	Latrobe	172	333	6	2,087	157	0	1,955	39	52	4,801
	War-Wynyard	2,320	135	159	124	20	0	21	2,510	103	5,392
	West Coast	11	5	0	7	7	0	0	9	1,458	1,497
	Total	11,340	6,609	3,467	1,2174	1,474	759	4,164	3,969	1,905	45861

3.2.13 Next in the hierarchy, is in my opinion Ulverstone, which comprises the largest town centre outside of the Devonport LGA in this central part of the Cradle Coast region. Ulverstone is similar in size to Wynyard which in my opinion would in a regional hierarchy be likely to be at the same level as indicated in the regional land use strategy. Although realistically the other district activity centres identified do not in my opinion, perform the same function. Ulverstone, albeit not to the same degree, also attracts workers outside of the LGA boundaries and its activity centre would not only serve surrounding residents.

3.2.14 Next order activity centres⁴ below Ulverstone, servicing more than their immediately surrounding residential areas, in other LGAs near the Devonport include:

- Latrobe
- Penguin
- Shearwater/Port Sorell

3.2.15 Each of these have slightly differing characteristics with some like Penguin attracting people from a broader spatial area because of the bespoke range of shops and food outlets and its tourism focus. Latrobe has an element of this, although not as strongly whereas Shearwater is primarily focussed on servicing the Port Sorell, Shearwater and Hawley area.

3.2.16 In the analysis and description of activity centres in the regional land use strategy at section 4.7, the terms of settlement, town and activity centre are used interchangeably. It could be read as if there was only one activity centre per settlement. While for smaller settlements this is the case, it isn't for the larger settlements like Devonport and Burnie and wasn't at the time that the regional land use strategy was prepared.

⁴ Described as District Activity Centres in the regional land use strategy

3.2.17 In my opinion this is because the regional land use strategy was seeing the range of centres within the settlement of Devonport (Greater Devonport) or Burnie as a collective centre which aligns with how the interdependencies are described at page 71. I have proceeded on the basis though that it is useful to understand how distinct activity centre areas within the Greater Devonport function.

3.2.18 Turning to the existing activity centres in the Greater Devonport as outlined in Table 3 and as shown in Figure 6 I would characterise these existing centres as outlined in Table 5

Table 5 Characteristics of existing activity centres in the Devonport LGA.

Activity centre	Existing characteristics	Zoning
Devonport CBD (including Fourways)	<p>Primary activity centre with a mix of offices, diverse retail and services, entertainment activities, visitor accommodation and eating establishments. Is a key employment centre.</p> <p>Contains a central walkable core and has seen significant growth in new development through the Living City program.</p> <p>Fourways linkage could be strengthened.</p>	Central Business, Urban Mixed Use and General Business
East Devonport	<p>Small local shopping centre servicing surrounding residential areas and Port of Devonport. Limited retail and food offerings.</p>	Local Business
Spreyton	<p>Very small local shopping precinct servicing with basic food retailing and post office and some rural suppliers. Meets basic grocery needs of surrounding residential areas as well as the industrial employment areas.</p> <p>Does not contain a broader mix that would be expected of a successful neighbourhood centre.</p> <p>Has potential for intensification with vacant and underutilised sites, but is located at the southern end of the peri-urban area which limits its potential catchment.</p> <p>Sites are generally small and not capable of accommodating large floor area retailing.</p>	Local Business
William Street	<p>Commercial strip primarily containing a mix of drive through take-aways, bulky goods and service industry.</p> <p>Would not describe as a standalone activity centre, because of connected nature to Fourways and the Devonport CBD.</p> <p>Sites are generally small to moderate in size and not capable of accommodating large floor area retailing.</p>	Urban Mixed Use
Don Road	<p>Commercial strip primarily containing mix of bulky goods, service industry and some light industrial activity. A key use focus is car yards, which often seek to collocate.</p> <p>Provide employment opportunities for broader population and would attract people from across LGA as well as outside of the LGA for specific businesses.</p>	Commercial Zone
Formby Road	<p>Commercial strip containing a mix of bulky goods, service industry as well as some consulting rooms and visitor accommodation. Would attract people from across Devonport LGA and potentially outside of the LGA for specific businesses.</p>	Commercial
Valley Road	<p>Small local shopping centre servicing surrounding residential area.</p>	Local Business
Forbes Street	<p>Local shopping strip containing primarily small-scale retail with some other business and commercial uses. Would attract some people from outside immediate area for specific businesses.</p>	Local Business

Activity centre	Existing characteristics	Zoning
Southern East Devonport	Limited retail activity. Primarily focussed on visitor accommodation.	Local Business
Stony Rise (Devonport Homemaker centres)	Commercial centre primarily providing for bulky goods but with some food service, including drive-through take-away and vehicle fuel sales. Site contains key anchor tenants which draw people from a wide catchment. Nearest locations for similar business are Burnie and Launceston.	Commercial (with SAP)

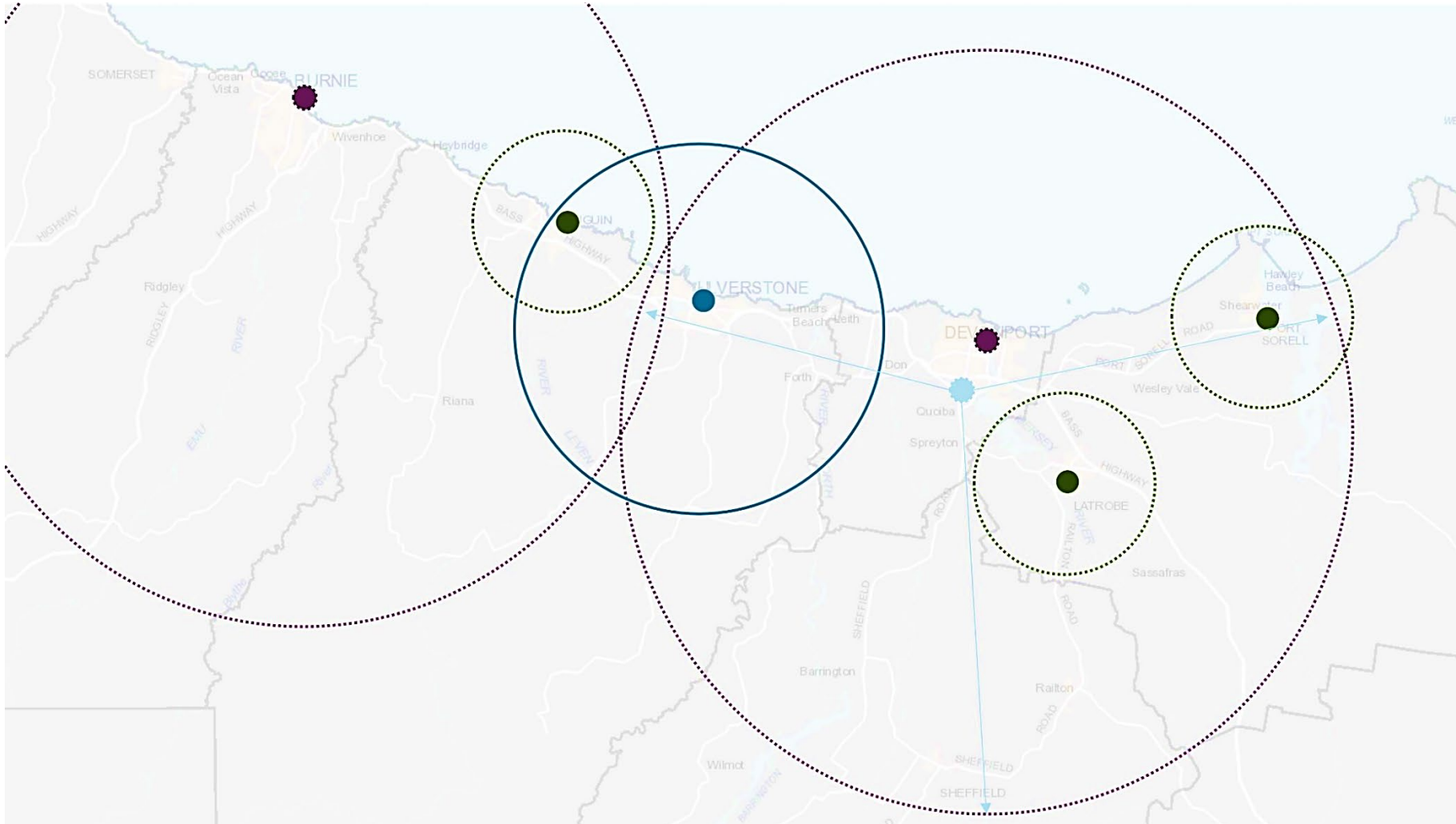


Figure 5 Existing highest order activity centres and their zone of influence. The existing Devonport Homemaker Centre is shown in light blue and its influence already extends beyond the LGA because of its speciality nature

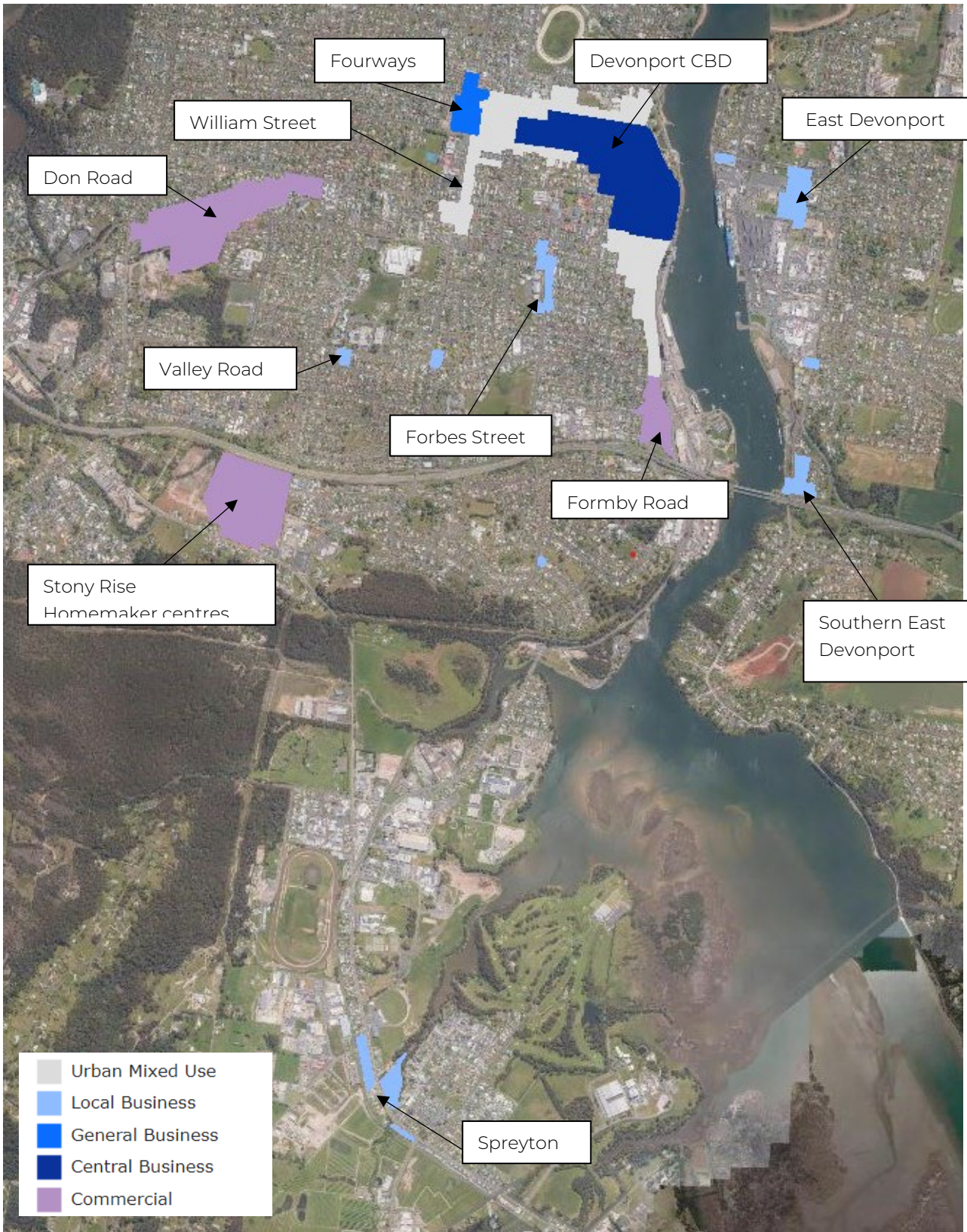


Figure 6 Existing business and commercial zoning in Devonport LGA

3.3 Residential growth areas

- 3.3.1 Devonport City Council has prepared a Greater Devonport Residential Growth Strategy (residential growth strategy).
- 3.3.2 The residential growth strategy does promote an aspirational population target of 30,000 by the year 2030, with key future investigation areas located to the east, south and south-west of the Greater Devonport area.
- 3.3.3 While this growth requires a significantly greater growth rate than what has occurred over the last few census periods, an undersupply of residential land for the LGA is well recognised and has underpinned other major planning scheme amendments such as the Devonport Showgrounds Specific Area Plan.
- 3.3.4 Additionally, while these potential residential growth areas still need to be investigated and considered, including for agricultural land issues, it is reasonable, in my opinion, to assume that there is residential growth potential in the area south of the Bass Highway, noting that the Stony Rise and Spreyton area has seen considerable residential growth in the past 10 years. Including through intensification of existing rural living or low density residential land.

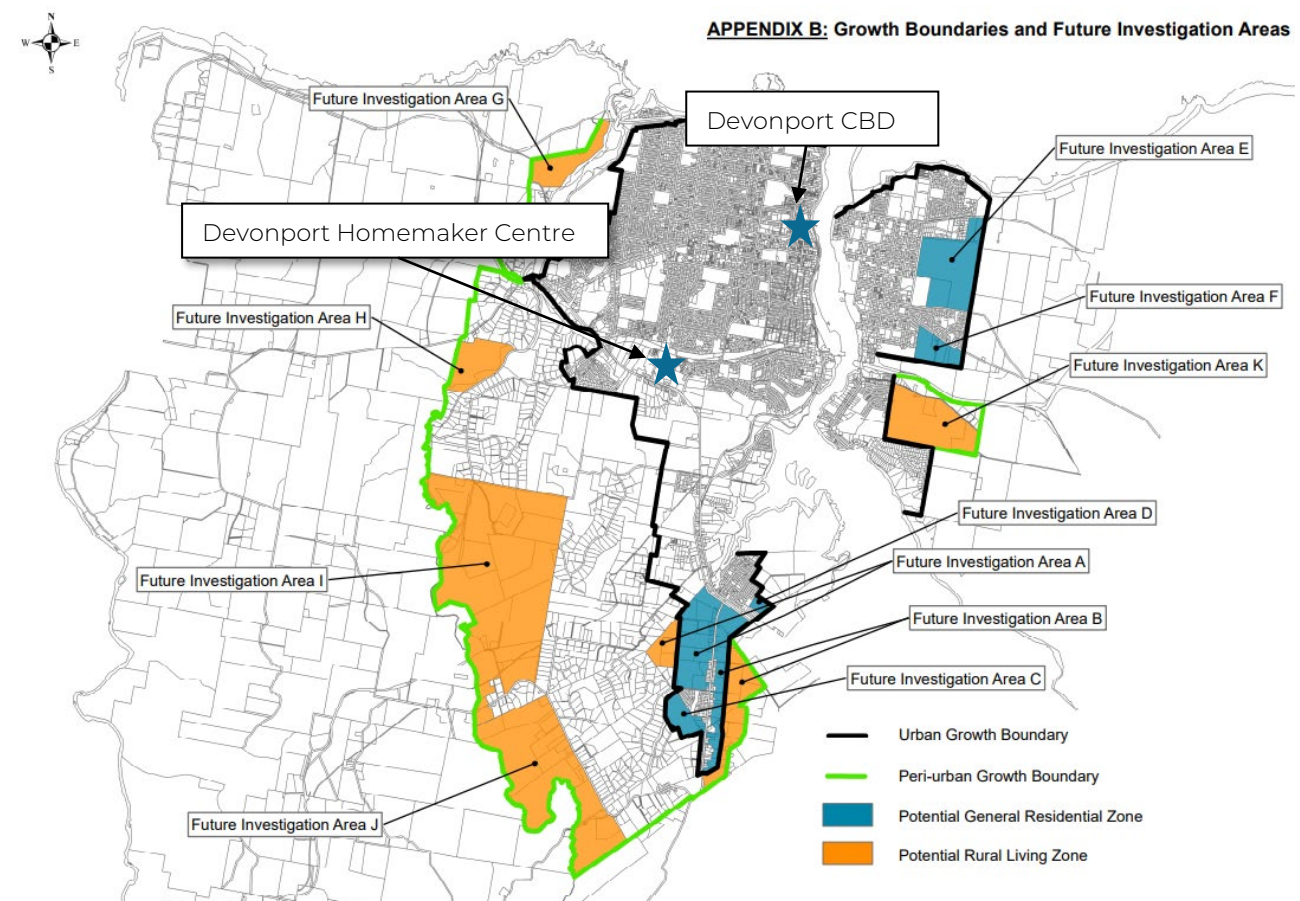


Figure 7 Residential growth areas with location of Devonport CBD and Devonport Homemaker Centre/Stony Rise Village locations shown in blue stars.

4 Analysis

4.1 Commercial and retail demand

4.1.1 I have relied on the evidence of Mr Ellis Davies in identifying the existing and future demand for commercial and retail activity for the Devonport LGA. Key information that I have specifically relied on are as follows:

- There is an existing retail floorspace shortfall of 10,000m² of which:
 - 3,290m² is for food, liquor, and gaming⁵
 - 1,100m² is for food catering
 - 2,270m² is for other retailing
 - 3,180m² is for large format retailing
- Within 3 years the demand for additional retail floorspace associated with food, liquor and gaming will increase to 4,240m². It is important to understand, that the nature of commercial development requires generally 3 to 4 years to accommodate detailed design, approvals, construction and fit-out.
- By 2036 the retail floorspace shortfall will increase to 24,070m² of which:
 - 6,410m² is for food, liquor and gaming
 - 2,780m² is for food catering
 - 6,680m² is for other retailing
 - 7,350m² is for large format retailing

4.1.2 In summary, there is a significant undersupply of existing retail floorspace in Devonport which is projected to increase over time.

4.1.3 The largest demand is for food and large format retailing, which in my experience through the preparation of strategic plans for settlements is a result of these being retail floor area sectors that are less affected by increasing online retailing. Additionally, food retailing is also less affected by economic conditions as a significant proportion of spending relates to essential goods for households, rather than discretionary expenditure.

4.2 Capacity of existing zoned land

4.2.1 I have undertaken an analysis of existing zoned land in the Devonport LGA to determine the capacity and likelihood of redevelopment to accommodate the current retail gap and future demand, focussing on land available for large floor area retailing.

4.2.2 The zoned land I have considered is land in the Central Business, General Business, Local Business and Commercial zones.

4.2.3 Typically, in my experience the suite of business zones play the primary role in delivering the activity centre hierarchy although the Commercial Zone is often used, particularly if the intention is primarily to deliver large floor area retailing, typically in urban areas. This is reflected by the use status for the key retail and commercial related uses under those zones in the State Planning Provisions as shown in Table 6 and the Section 8A Guidelines relating to zone application.

⁵ As outlined in the evidence of Mr Ellis Davies the Food, Liquor and Groceries (FLG) category, includes supermarkets, fresh food stores and liquor outlets, while Food Catering, includes spending at cafes, restaurants and takeaway food stores. Non-food would be all other retailing except for large format retailing which is typically known as bulky goods.

4.2.4 This approach also aligns with how the regional land use strategy approaches activity centres which in my opinion is recognising individual areas within a single settlement as a collective activity centre (see paragraph 3.2.18 of my evidence)

Table 6 Use status of retail and commercial relates use classes under business, commercial and mixed use zones in the State Planning Provisions

	Local Business	General Business	Central Business	Commercial	Urban Mixed Use
Bulky goods	Permitted	Permitted	Permitted	Permitted	Permitted
Business and professional services	No permit required	No permit required	No permit required	Discretionary	Permitted
Food services	No permit required	No permit required	No permit required	Discretionary	Permitted
General retail and hire	No permit required	No permit required	No permit required	Discretionary	Permitted
Service industry	Discretionary	Discretionary	Discretionary (existing use only)	Permitted	Permitted (if for motor repairs or panel beating)

4.2.5 My analysis is outlined in Table 7 below. In summary there are 783 land parcels across the five zones with a total area of 89.37ha. This excludes land in casement parcels. In total there is 10.11 ha of vacant land of which none is available in the Central Business and General Business zones (Figure 8).

4.2.6 While it would be reasonable to assume that some existing developed lots in the Central Business and General Business zones are underutilised and have redevelopment potential, there are only 3 lots/properties in total across these two zones which are over 5,000m²⁶ as shown in Figure 9. These lots all form part of the current supermarket complexes between Best Street and Oldaker Street.

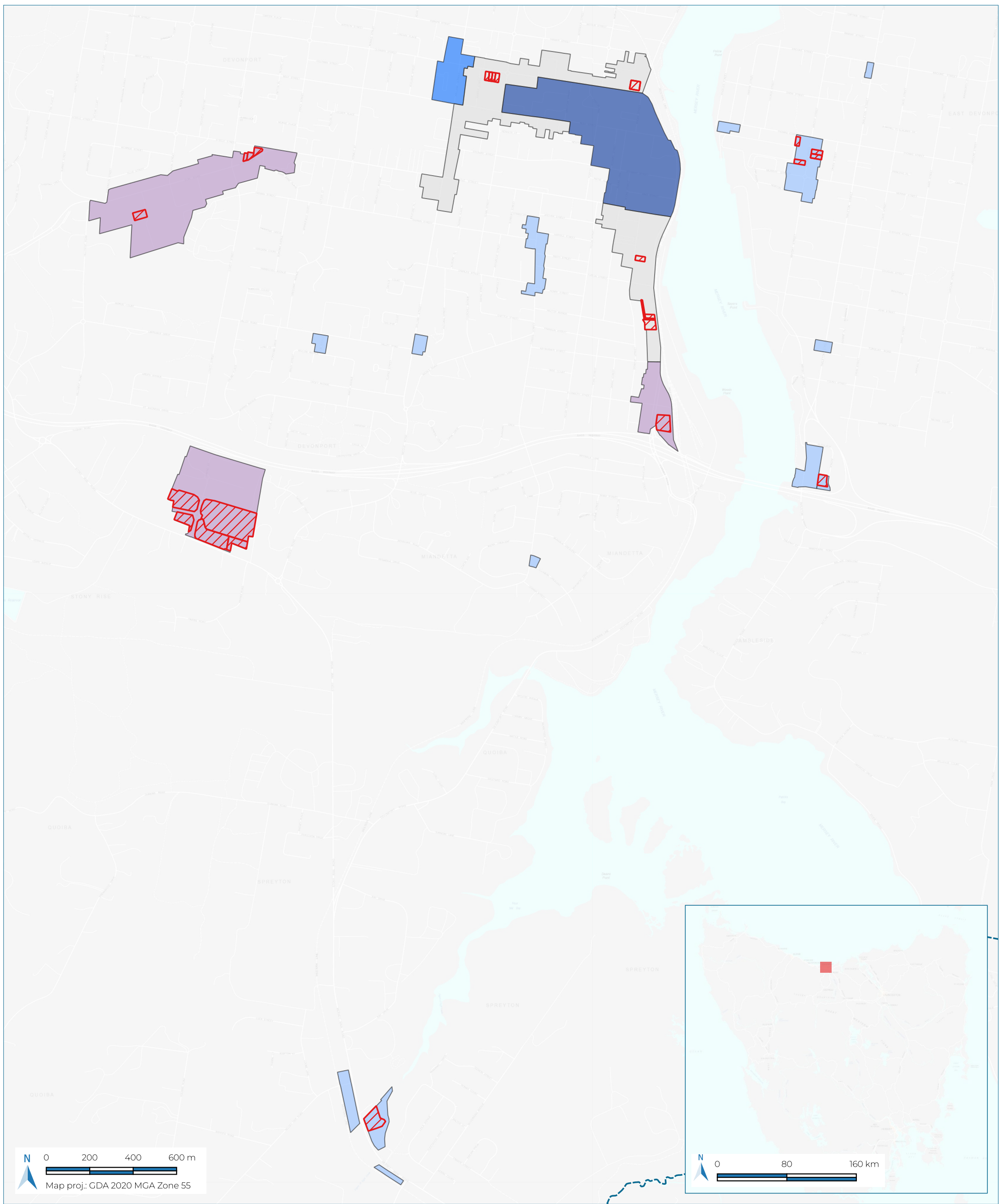
4.2.7 There is clearly a shortage of suitably sized vacant and privately owned land parcels that can be developed to accommodate the immediate retail floorspace gap where related to retail that requires large floor area.

⁶ I have taken 5,000m² as a conservative area to accommodate large floor area retailing taking into account building area, car parking and access/delivery requirements. By point of comparison Harvey Norman at Stony Rise occupies 14,460m², the Burnie homemaker centre 11,240m², the Ulverstone Coles complex approximately 8,000m², the Devonport Woolworths on Best Street approximately 16,000m², Harvey Norman Hobart 6,135m², Woolworths New Town 10,330m².

Table 7 Summary of land supply for retail and commercial floorspace

Zone	Total zoned area	Total no. of lots	Total no. of privately owned freehold lots	Total area of privately owned freehold lots	Total area of vacant lots	No of privately owned lots/ properties over 5,000m ²	No of lots/ properties over 5,000m ² that are vacant/ underutilised
Local Business	13.12 ha	94	83	10.45 ha	1.28 ha	2	1 (located at Spreyton)
General Business	3.12 ha	81	56	2.30 ha	0 ha	0	0
Central Business	20.95 ha	315	243	13.11 ha	0 ha	3	0
Commercial	30.49 ha	95	91	29.08 ha	7.98 ha	11	4 ⁷ (located at Stony Rise with one lot at Don Road)
Urban Mixed Use	21.68ha	198	172	19.33 ha	0.84 ha	0	0
TOTAL	89.37 ha	783	645	56.04 ha	10.11 ha	16	5

⁷ There is also an underutilised site not currently in use in the Commercial Zone over 5,000m² that is located on the corner of Formby Road and Ashburner Street

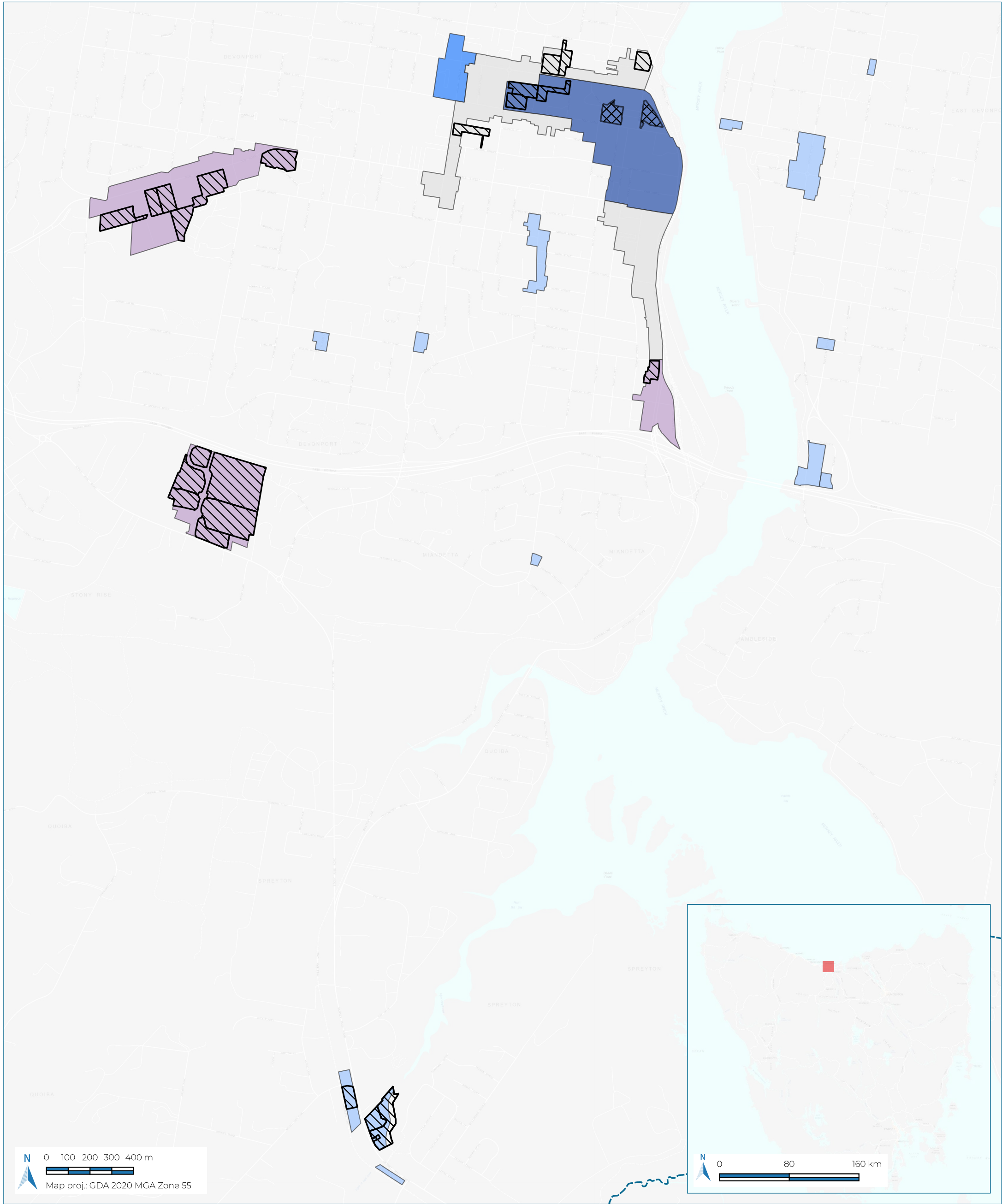


- Devonport municipality
- Vacant parcels
- TASMANIAN PLANNING ZONES
- Local Business
- General Business
- Central Business
- Commercial
- Urban Mixed Use



Job Number 2324-023
Revision V.1
Date 20 November 2023
Paper size A3

Figure 9
Vacant parcels



Devonport municipality
 CADASTRAL PARCELS (over 5000 sq.m.)
 Authority Land
 Private Parcel

TASMANIAN PLANNING ZONES

- Local Business
- General Business
- Central Business
- Commercial
- Urban Mixed Use



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Figure 10
Land Parcels and
Planning Zones

4.3 Summary

- 4.3.1 There is a current retail floorspace gap in the Devonport LGA which is expected to increase over the next 15 years.
- 4.3.2 The additional floorspace is predominantly in the food, liquor and gaming and large format retail sectors. This is unsurprising as these are the least affected by online retailing. Food, liquor and gaming is also less affected by macro-economic conditions and represents the highest more immediate demand area.
- 4.3.3 The current supply of suitably zoned land is insufficient to meet this demand overall. There is a particular shortage of suitably sized land for supermarket complexes and large format retailing.
- 4.3.4 The only vacant available land currently in a suitable zone suitable for these activities is the land contained at Stony Rise Village. Potential use of this land to accommodate the immediate need in the food, liquor and gaming retail sector is constrained by the Clause DEV-S1.0 Devonport Regional Homemaker Centre Specific Area Plan.

5 Assessment of Draft Amendment

5.1 Does the Draft Amendment address a strategic need?

- 5.1.1 The intention of the Draft Amendment has been to facilitate a supermarket complex on the vacant land shown in Figure 1 and referred to as Stony Rise Village.
- 5.1.2 This broadly corresponds with the need to provide more floorspace for food retailing and therefore at a first principle level, it is my opinion that the Draft Amendment does address a strategic need.
- 5.1.3 The next question is whether this the Stony Rise Village land is the appropriate location to meet this need.
- 5.1.4 Firstly, I will address if the need should be accommodated within the Devonport CBD, either through rezoning or multi-storey redevelopment.
- 5.1.5 For the Devonport CBD to retain its primary it is not, in my opinion, required to provide for all of the retail floorspace gap. This is for the following reasons expressed in the paragraphs below.
- 5.1.6 As the CBD, growth in the area should focus on supporting a dense, walkable, and active built environment with a diverse range of activities.
- 5.1.7 There are two existing supermarkets within the CBD, along with a Hill Street Grocer. While small scale food retailing would be appropriate scattered across the CBD further food retailing which support the daily and weekly needs of residents and visitors would be best located in a separate area to reduce transport disadvantage of more outlying residential areas and support a more walkable environment for some residents as well as greater convenience.
- 5.1.8 Devonport has a sufficient population (over 26,000 in 2021) and a broad catchment to warrant second order activity centre. While Council's draft Activity Centre hierarchy identifies East Devonport and Spreyton as the second order activity centre (Local Suburban Centre), these areas in my opinion are and only have capacity to be local level activity centres. A second order activity centre would support more than its immediate surrounding residential areas, similar to say a minor or neighbourhood centre under the Southern Tasmania Regional Land Use Strategy.
- 5.1.9 The Devonport CBD is now of a size and scale with a sufficient breadth of activity that it is 'self-sustaining' and would naturally promote centralisation of activities as businesses seek to collocate and maximise agglomeration activities. The Devonport CBD has an area of land nearly three times that available across the entire area zoned Commercial where Stony Rise Village is located.
- 5.1.10 In my opinion, it would also be best to locate a second order activity centre with existing land used for retail and commercial purposes in order to support compact and efficient use of land, effective transport networks and agglomeration economies.
- 5.1.11 A logical location given the physical barrier created by the Bass Highway and the extent of new subdivision and housing development in the southern part of Greater Devonport is around Stony Rise Village. Additionally, the centre already draws in people from a broad catchment because of the key anchor tenants and would mean that people arriving could fulfil more than one retail function at once.
- 5.1.12 Even with the addition of other retailing at Stony Rise Village, the combined area including Devonport Homemaker Centre would retain its primary large floor area retailing characteristics and would provide a different focus than the Devonport CBD and therefore many people visiting the activity centre would do so for different reasons that visiting the Devonport CBD.

5.2 Are specific provisions required?

- 5.2.1 In my opinion, having established that the vacant land at Stony Rise Village would support a strategic need and is an appropriate location for doing so therefore representing sound strategic planning, the next consideration is whether specific provisions are required to achieve this purpose.
- 5.2.2 To provide a basis for this consideration is it important to understand the differences between development standards for the site in the:
- Commercial Zone of the Devonport Interim Planning Scheme (IPS)
 - Commercial Zone of the Tasmanian Planning Scheme – Devonport (TPS)
 - The existing Devonport Regional Homemaker Centre SAP (Existing SAP)
 - Specific area plan under the certified Draft Amendment (Certified SAP)
- 5.2.3 The core differences between these standards are summarised in Appendix A.
- 5.2.4 This analysis identifies that while there are similarities between development standards across various planning scheme instruments, the existing SAP, and the certified SAP in my opinion, micro-manage the range of retail and commercial uses to a much higher degree to enable a permitted pathway. In comparison the Commercial Zone pushes the key use classes into a discretionary pathway with management through a use standard performance criterion.
- 5.2.5 The Commercial Zone approach does provide much greater flexibility to changing circumstances over time. It also means that there is no 'as of right' for most retail and office related uses and that each proposal is tested on its merits. In my opinion a more upfront way of protecting the activity centre hierarchy.
- 5.2.6 While the Commercial Zone has few limitations over bulky goods use, it is my opinion that Stony Rise Village is an appropriate location and the Devonport CBD less so for these type of use.
- 5.2.7 Accordingly, it is my opinion that it is entirely unnecessary to 'micro-manage' the range of retail and commercial activities in terms of floor area of tenancies, specific type of products sold and so forth. Fundamentally, in the context of sound strategic planning, there is a significant retail floorspace gap for Devonport LGA, which will only increase over time. Additional land for retail and commercial activities must be provided. Reasonably there should be a second order activity centre for Devonport. The size and scale of the Devonport CBD is now sufficient that it is self-sufficient and its own draw card for people and new businesses that further the nature of a central business district.
- 5.2.8 Differences between development standards are minimal and in my opinion site specific development standards serve no clear planning purpose for the site any longer. The site does not have any particularly unique landscape or built characteristics. Additionally, the adjoining Bass Highway and access from it is sufficiently protected through the provisions of the Rail and Railway Assets Code.

5.3 Legislative requirements

- 5.3.1 Section 34(2) of the Act is relevant for a planning scheme amendment as it stipulates the assessment criteria to be met. These criteria are as follows:
- (a) contains all the provisions that the SPPs specify must be contained in an LPS; and
 - (b) *is in accordance with section 32; and*
 - € *furtheres the objectives set out in Schedule 1; and*
 - (d) *is consistent with each State policy; and*
 - (da) *satisfies the relevant criteria in relation to the TPPs; and*

- (e) *as far as practicable, is consistent with the regional land use strategy, if any, for the regional area in which is situated the land to which the relevant planning instrument relates; and*
- (f) *has regard to the strategic plan, prepared under section 66 of the Local Government Act 1993, that applies in relation to the land to which the relevant planning instrument relates; and*
- (g) *as far as practicable, is consistent with and co-ordinated with any LPSs that apply to municipal areas that are adjacent to the municipal area to which the relevant planning instrument relates; and*
- (h) *has regard to the safety requirements set out in the standards prescribed under the Gas Safety Act 2019.*

5.3.2 For the purposes of this evidence, I am not addressing all legislative requirements but focussing on the key matters relevant to issues raised in the hearing process to date.

Requirements of section 32

5.3.3 Section 32 of the Act outlines the requirements in relation to the contents of an LPS. It limits the use of unique local provisions in the form of a particular purpose zone, specific area plan or site-specific qualification under section 32(4) as follows:

An LPS may only include a provision referred to in subsection (3) in relation to an area of land if –

- (a) *a use or development to which the provision relates is of significant social, economic or environmental benefit to the State, a region or a municipal area; or*
- (b) *the area of land has particular environmental, economic, social or spatial qualities that require provisions, that are unique to the area of land, to apply to the land in substitution for, or in addition to, or modification of, the provisions of the SPPs.*

5.3.4 This is a threshold test which must be satisfied and is included in the legislation in order to ensure the maximum degree of statewide consistency under the TPS. The current Cause DEV-S1.0 Devonport Regional Homemaker Centre Specific Area Plan was not subject to this requirement as it was a direct translation across from the interim planning scheme in accordance with the provisions of Schedule 6 of the Act.

5.3.5 In my opinion, the S should be modified so as to remove Clause DEV-S1.0 Devonport Regional Homemaker Centre Specific Area Plan so that the land currently subject to the specific area plan is managed through the provisions of the Commercial Zone and relevant codes only.

5.3.6 This would mean that the requirement under section 32(4) of the Act is not enlivened and does not need to be satisfied.

5.3.7 As outlined in paragraph 2.2.3, I have included an alternative SAP which reduces the unique local provisions to a minimum, should the Commission still be concerned that the Commercial Zone does not have sufficient capacity to protect the activity centre hierarchy and the primacy of the Devonport CBD. The evidence of Mr Ellis Davies addresses the social and economic benefit of an alternative SAP for the purposes of section 32(4) of the Act.

Regional Land Use Strategy

5.3.8 Section 34(2)(e) requires the amendment, as far as practicable, to be consistent with the regional land use strategy. The regional land use strategy guides land use, development, and infrastructure

decisions. It sets out the strategy and policy basis to facilitate and manage change, growth, and development.

- 5.3.9 The regional land use strategy includes a suite of land use planning policies at section 2 and 4 that are intended to guide decision making by State and local government including through the planning scheme amendment process. They outline how the strategic outcomes will be achieved.
- 5.3.10 Through the application of these land use policies, the Cradle Coast Regional Land Use Strategy seeks to achieve strategic outcomes related to natural systems, economic activity, liveable and sustainable communities, and infrastructure provision.
- 5.3.11 The following policies in Table 8 below are particularly relevant to the proposal. In my response I have been considerate of the legislative requirement under section 34(2)(e) to be consistent 'as far as practicable'.
- 5.3.12 I have proceeded on the basis that 'as far as practicable' would require consideration of contemporary conditions, as well as other requirements of the Act including protecting the State Planning Provisions by minimising unique local provisions.
- 5.3.13 I have also taken into account the likely impact on the Devonport CBD in my response, although as outlined in paragraphs 3.2.16 and 3.2.17 of my evidence, the regional land use strategy does not in my opinion distinguish between individual areas in Greater Devonport and is treating the settlement as a collective activity centre⁸, leaving allocation of land for activity centres purposes to be resolved through the applicable planning scheme.
- 5.3.14 Where I refer to the modified Draft Amendment in Table 8 it should be taken to mean the Draft Amendment in accordance with the modification as I have outlined in paragraph 2.2.1 of my evidence.

Table 8 Assessment against land use policies

Policy	Response
Land use policies for a changing climate	
<p>Land use planning processes for mitigation and adaptation -</p> <ul style="list-style-type: none"> b. Promote compact and contained settlement centres which allow reduced dependency on private vehicle use and the length of daily journeys by providing communities with ready local access to daily needs for employment, education, health care, retail and personal services and social and recreation facilities, including: <ul style="list-style-type: none"> i. a greater mix and less dispersal or segregation in the nature and distribution of land use ii. provision of local activity centres where there is a concentrated mix of activity for shopping, working, studying, recreation and socialising clustered at readily accessible locations iii. improvement in the level of internal connectedness and convenience for pedestrian, cycle and public transport options iv. increase in urban densities for residential and commercial use 	<p>The modified Draft Amendment supports a compact and contained settlement pattern as it will facilitates provisions of additional commercial land required to support filling the existing and future retail floorspace gap in an existing urban area.</p> <p>The site is afforded excellent accessibility and use of the land for a range of retail purposes aligned with the Commercial Zone The allowance of additional retail activity, will support reduced dependence on private vehicle use by providing for multi-purpose trips.</p> <p>Furthermore, provision of additional retail land south of the Bass Highway will improve convenience for the community and an accessibility by residents of nearby areas through walking and cycling.</p> <p>The modified Draft Amendment aligns with this this policy.</p>

⁸ At the time the regional land use strategy was prepared the Devonport Homemaker Centre was already a concept in development.

Policy	Response
<p>v. location of employment opportunities within a greater number of centres and at a rate commensurate with local need</p> <p>vi. minimise expansion at the urban fringe and creation of rural residential clusters in remote or poorly connected locations</p>	
Land use policies for water management	
<p>Land use planning processes –</p> <p>b. Identify the surface water and ground water features, hydrological function, and natural features and areas necessary for the ecological and hydrological integrity of catchments</p>	<p>This policy would be unaffected by the Draft Amendment</p>
Land use policies for economic activity	
<p>Land use planning processes for economic activity –</p> <p>e. Protect designated economic activity and employment lands against intrusion by alternate forms of use or development</p>	<p>This policy would be further by the modified Draft Amendment by supporting additional retail activity in an existing activity centre area and in location and manner (by reliance on the Commercial Zone provisions relating to use status and use standards) that will not undermine the economic future of the Devonport CBD.</p> <p>The modified Draft Amendment aligns with this this policy.</p>
Land use policies for business and commercial activity	
<p>Land use planning process for business and commercial activity –</p>	
<p>a. facilitate convenient access in each settlement area to food and convenience goods retailers and services</p>	<p>The provision of Commercial zoned land for retailing south of the Bass Highway servicing the daily and weekly needs of residential will considerably improve convenience for residential living in the Greater Devonport area. Mr Ellis Davies has also address increased convenience in his evidence.</p> <p>The modified Draft Amendment aligns with this this policy.</p>
<p>b. promote the distribution of higher order retail goods and services throughout the Region in a manner consistent with recognised settlement patterns and at a scale, type and frequency of occurrence appropriate to settlement size, local consumer demand, and relationship to the wider regional market</p> <p>i. In this regard Devonport, Burnie, Latrobe, Sheffield, Ulverstone, Wynyard, Queenstown, Smithton and Currie will provide regional or district business and commercial service roles in addition to meeting local demand.</p>	<p>As outlined in section 5.1 of my evidence the provision of Commercial zoned land presents a logical opportunity to provide for a second order activity centre within the Devonport LGA without undermining the Devonport CBD. The provisions of the Commercial Zone can be relied on to keep the focus of the retailing activities appropriate to the purpose of the zone, with a discretionary use status and applicable use standard providing safeguards for protection of the higher order activity centre.</p> <p>The modified Draft Amendment aligns with this this policy.</p>
<p>c. facilitate retail and service provision to complement and enhance the collective drawing power of existing retail and service areas but which does not involve location of major attractors for the express purpose of capturing market share in excess of that warranted by settlement size and relative function in a regional context</p>	<p>The activity centre which Stony Rise Village would form part of already has a significant catchment, drawing people form outside of the LGA. The removal of the SAP will not result in capturing any additional market share to the site in a way that would undermine the role of the Devonport CBD. As outlined in section 5.1 and 5.2 of my evidence, the CBD is of sufficient size, scale and</p>

Policy	Response
	<p>complexity that it is self-protecting in that people will continue to visit the CBD for a broader range of purposes. The activity centre area containing the Devonport Homemaker Centre and Stony Rise Village would continue to be primarily for large floor area retailing and will only support a slightly different range of retail and commercial activities than what could currently occur. Market share is also addressed in the evidence of Mr Ellis Davies.</p> <p>The modified Draft Amendment aligns with this this policy.</p>
<p>d. promote integration of neighbourhood retail and service provision into residential areas at a scale, location and disposition suitable to service local need</p>	<p>As outlined in section 5.1 of my evidence, there is a clear need for additional land for retail uses. South of the Bass Highway has over the last 15 years been a key residential growth area for Greater Devonport and is also identified for further growth in Council's residential growth strategy. In my opinion Stony Rise area is a logical place to provide for further retail uses of a neighbourhood scale that will support the residential areas south of the Bass Highway. The modified Draft Amendment aligns with this this policy.</p>
<p>e. maintain the integrity, viability and vitality of established centres by locating new business and commercial development onto land within or immediately contiguous with existing town centres and commercial zones</p>	<p>The land subject to the Draft Amendment is already an activity centre. While it is currently specialised in nature, removing the SAP and relying on the Commercial Zone provisions will maintain its overall existing speciality purpose, but provide sufficient flexibility to allow for retail and commercial activities appropriate to serve a neighbourhood function of a second order activity centre within an LGA.</p> <p>The modified Draft Amendment aligns with this this policy.</p>
<p>f. promote increased mix of land use, including for housing, within accessible business centres to encourage viability and vitality</p>	<p>The modified Draft Amendment aligns with this this policy.</p>
<p>g. prevent linear commercial development</p>	<p>The Draft Amendment would not offend this policy.</p>
<p>h. prevent leakage of commercial and retail activities from preferred locations by restricting retail sales in other land use areas</p>	<p>The Commercial Zone under the SPPs limit retail, food services and business and professional services through a discretionary use status with a specific use standard for which the objective is to protect the activity centre hierarchy. This in my opinion is sufficient to manage any leakage from the Devonport CBD that might occur as a result of future permit applications. I do note however that in general terms the evidence of Mr Ellis Davies is that the removal of the SAP would not undermine the priority on providing for retailing in the Devonport CBD. The modified Draft Amendment aligns with this policy.</p>
<p>i. provide designated locations for bulky goods and large format retailing, including for vehicle, building and trade supply, and home improvement goods</p>	<p>The Commercial Zone under the SPPs specifically provides for land where the intended purpose is for bulky goods and large format retailing. Other retail, food services and business and professional services have a discretionary use status and require assessment against a</p>

Policy	Response
	<p>use standard for which the objective is to protect the activity centre hierarchy.</p> <p>The modified Draft Amendment aligns with this policy.</p>
<p>j. restrict sale of food, clothing and carry away consumables through bulky goods and large format retail outlets located outside town centres</p>	<p>The land subject to the Draft Amendment is not outside of a town centre. It is within the established urban area and is currently an activity centre albeit specialised in nature. This specialised nature would not in my opinion significantly alter under the Draft Amendment as proposed for modification.</p>
<p>k. require proposals for major business or commercial development outside designated town centres be supported by need, absence of suitable alternative sites and of potential for immediate, incremental or cumulative adverse affect on established town centres and the regional pattern of retail and service provision</p>	<p>The land subject to the Draft Amendment is not outside of a town centre.</p>
<p>Land use policies for managing growth and development</p>	
<p>Land use planning processes for urban settlement areas –</p> <p>a. Assume a low growth scenario under which demand is driven by internal population change and low rates of inward migration</p> <p>b. Promote established settlement areas as the focus for growth and development</p> <p>c. Promote optimum use of land capability and the capacity of available and planned infrastructure service</p> <p>d. Match land supply to need and provide sufficient land within the designated urban settlement boundaries of each centre to meet forecast need for a time horizon of not less than 10 years but not exceeding 20 years.</p>	<p>In my opinion, it is no longer practicable to assume a low growth scenario given the statistical evidence available as outlined in section 3.1 of my evidence.</p> <p>The modified Draft Amendment does however seek to maximise the use of established urban areas and is responsive to a clear forecast retail need. As outlined in the evidence of Mr Ellis Davies there is an existing retail floorspace gap that will increase over the next 15 years.</p> <p>The modified Draft Amendment would to rely on the Commercial Zone provisions only and would not result in an oversupply.</p> <p>By 2036 the retail floor area gap is projected to be 24,070m² in total. The additional land made available for a range of retail activities should the Draft Amendment be modified would be a further 46,983m². However once typical site cover of buildings⁹ is taken into account this area of land would provide for approximately 18,000m² of floor space, so still less than what is required to meet the predicted retail floor area demand.</p> <p>The modified Draft Amendment aligns with this policy.</p>
<p>Land use policies for active communities</p>	
<p>Land use planning processes –</p> <p>b. Recognise recreation, leisure and well being opportunities are integrated with settlement activity and do not always require a discrete land allocation, such as urban trails and walkways as detailed in the North West Coastal Pathway project</p> <p>c. Facilitate equitably distribution of accessible built and natural settings in a variety of locations for formal and informal recreation, including for unstructured and structured physical and contemplative activity, sport, personal enjoyment, positive social interaction, spiritual well-being and the achievement of human potential</p>	<p>Provision of additional land for retail activities that support daily and weekly needs of the nearby residential communities south of the Bass Highway will support a more walkable community.</p> <p>The modified Draft Amendment aligns with this policy</p>

⁹ This typically is around 40% taking into account car parking and access requirements for large floor area retailing.

Policy	Response
Land use policies for integrated land use infrastructure planning	
<p>Land use planning processes –</p> <p>c. Promote compact contained settlement areas to:</p> <p>i. Assist climate change adaptation and mitigation measures</p> <p>ii. Optimise investment in infrastructure provision</p> <p>d. Direct new and intensified use or development to locations where there is available or planned infrastructure capacity and function appropriate to the need of communities and economic activity</p>	<p>The subject land is fully serviced and has infrastructure capacity suitable for further retail activity in accordance with the Commercial Zone.</p>

Appendix A Analysis of comparable provisions

Table 9 - Comparison of key standards across the previous planning schemes, State Planning Provisions, Devonport LPS and the Draft Amendment as certified

	Commercial Zone (IPS)	Commercial Zone (TPS)	Existing SAP	Certified SAP
Purpose, local objectives and/or desired character (key relevant points)	<ul style="list-style-type: none"> + Provide for large floor area retailing and service industries typically unsuited for location within the Local Business, General Business or Central Business zone. + Use and development to not include a supermarket or variety stores. 	<ul style="list-style-type: none"> + Provide for retailing and service industries that require large area and high vehicle access. + Provide a mix of use that supports and does not distort the role of other activity centres. 	<ul style="list-style-type: none"> + Provide for integrated bulky goods showrooms and trade supplies, including associated food outlets. 	<ul style="list-style-type: none"> + Provide for integrated bulky goods showrooms and trade supplies, including associated food outlets. + Provide for a neighbourhood centre. + Provide for other use and development that supports and does not distort the role of established activity centres. + Provide for a major supermarket in Precinct A
Use status				
Bulky goods sales	Permitted (if not retail sale of foodstuffs or clothing) otherwise discretionary	Permitted	Permitted for furniture and floor covers, electrical appliances, home entertainment equipment, Manchester, curtains, blind, camping and outdoor recreation equipment, office supplies, building, construction and hardware goods, garden and landscaping material, auto accessories, pet supplies. Discretion for motor vehicle, boat or caravan sales.	Permitted for furniture and floor covers, electrical appliances, home entertainment equipment, Manchester, curtains, blind, camping and outdoor recreation equipment, office supplies, building, construction and hardware goods, garden and landscaping material, auto accessories, pet supplies. Stony Rise Precinct A and B have further limitations. Otherwise discretionary
Business and professional services	Prohibited.	Discretionary	Prohibited	Permitted if in Precinct A or B and for a consulting room, medical centre, veterinary centre, child health clinic or dentist.
Food services	If not a licensed premises, not including drive through and a seating capacity not more than 20 people	Discretionary	Permitted if no more than 5 takeaway food shops and 2 restaurants.	Permitted if no more than 5 drive through facility food services and a total of 12 food services tenancies. If in Stony Rise Village no more than one drive through per precinct.
General retail and hire	Prohibited	Discretionary	Discretionary if a market retailing food from independent stall holders otherwise prohibited.	Permitted if in Stony Rise Precinct A if not for clothing, footwear, jewellery, or adult sex products, otherwise prohibited. Permitted if in Stony Rise Precinct B if not for a supermarket, pharmacy, bottle shop, clothing, footwear, jewellery or adult sex products, otherwise prohibited.
Service industry	Permitted	Permitted	Prohibited.	Permitted if for car wash, pet wash or laundromat.
Does a use standard for activity centre impacts exist?	Yes. Only applies to discretionary use and therefore not to some bulky goods, food services and service industry.	Yes. Two separate standards one applying to discretionary uses (therefore applicable to all office, retail and food services related uses) and a separate one for bulky goods.	Yes. Overall floor area restriction for entire SAP area as well as floor area restrictions per tenancy. Substitutes Commercial Zone use standards. Limitation of reliance on floor area as compared to how the Commercial Zone use standard applies, is that it doesn't capture all uses.	Yes.

	Commercial Zone (IPS)	Commercial Zone (TPS)	Existing SAP	Existing SAP	Certified SAP	
Acceptable solution	No acceptable solution	No acceptable solution	The gross floor area for Bulky Goods Sales must be not less than 250m ² per tenancy, unless the use relies on more than 50% of the site area for outdoor display of goods for sale.	The total gross floor area of all tenancies within the Devonport Regional Homemaker Centre Specific Area Plan must not exceed 46,150m ² .	<ul style="list-style-type: none"> (a) Excluding Food Services the gross floor area of each tenancy within a building must not be less than 500m²; and (b) The proportion of total gross floor area for all buildings: <ul style="list-style-type: none"> (i) for tenancies with a gross floor area of more than 3,000m² must be not less than 35%; and (ii) for tenancies with a gross floor area of between 1,000m² and 3,000m² must be not less than 35%. 	The gross floor area of a tenancy within a building must not be less than 500m ² with the exception of: <ul style="list-style-type: none"> (a) Food Services; (b) a use that relies on more than 50% of the site area for outdoor display of goods for sale; or (c) a use within Stony Rise Village Precinct A.
Performance criteria	Discretionary permit use must <ul style="list-style-type: none"> (d) be consistent with local area objectives; (e) be consistent with any applicable desired future character statement; (f) be required to service requirements of the municipal or regional resident and visitor population; and (g) minimise potential to have immediate, incremental or cumulative adverse effect on the municipal and regional pattern of retail and service provision 	A use listed as Discretionary must not compromise or distort the activity centre hierarchy, having regard to: <ul style="list-style-type: none"> (a) the characteristics of the site; (b) the size and scale of the proposed use; (c) the functions of the activity centre and the surrounding activity centres; and (d) the extent that the proposed use impacts on other activity centres. 	Bulky Goods Sales must not compromise or distort the activity centre hierarchy, having regard to: <ul style="list-style-type: none"> (e) the extent that the proposed use improves and broadens the commercial or retail choice within the area; (f) the extent that the proposed use impacts on surrounding activity centres; and (g) any relevant local area objectives contained within the relevant Local Provisions Schedule. 	No performance criterion.	No performance criterion.	The proposed use and development must be consistent with the local area objectives being: <ul style="list-style-type: none"> (a) for integrated bulky goods showrooms and trade supplies; (b) for a neighbourhood centre providing for food retailing and the convenience needs of the local area; or (c) compliments the function of a neighbourhood centre; and (d) does not unreasonably compromise or distort the role of established activity centres.
Floor space	Building area minimum of 500 sqm. (no min for individual tenancies)	Tenancy minimum of 250 sqm for bulky goods sales (no min for other use)		+ 46,150 sqm total gross floor area + Tenancy minimum of 500 sqm (excluding food services) + Tenancy breakdown of 35% larger than 3,000 sqm, 35% between 1000-3000 sqm and 30% less than 1000 sqm.	Tenancy minimum of 500 sqm (excluding food services and no min in Precinct A)	
Building height	10 m	12 m (8.5 m where less than 10 from residential zone)		12 m	12 m (8.5 m where less than 10 from residential zone)	
Setbacks	0 m	5 m		+ 20 m from Bass Highway + 6 m from Stony Rise Road	+ 20 m from Bass Highway + 6 m from Stony Rise Road + 5.5 m from any other road	

	Commercial Zone (IPS)	Commercial Zone (TPS)	Existing SAP	Certified SAP
Access and signage	No site-specific provisions.	No site-specific provisions.	Site specific access and signage restrictions.	Site specific access and signage restrictions.

Appendix B Alternative SAP

DEV-S1.0 Devonport Regional Homemaker Centre Specific Area Plan

DEV-S1.1 Plan Purpose

The purpose of the Devonport Regional Homemaker Centre Specific Area Plan is:

DEV-S1.1.1	To manage the scale and mix of use and development in the Devonport Regional Homemaker Centre.
DEV-S1.1.2	To provide large format retail offerings such as bulky goods sales and service industry use that require: (a) large floor or outdoor areas for the sale of goods or operational requirements; and (b) high levels of vehicle access and parking for customers.
DEV-S1.1.2	To provide for other use and development that supports and does not compromise or distort the role of other activity centres in the activity centre hierarchy including the Devonport Central Business District. .

DEV-S1.2 Application of this Plan

DEV-S1.2.1	The specific area plan applies to the area of land designated as Devonport Regional Homemaker Centre Specific Area Plan on the overlay maps.
DEV-S1.2.2	In the area of land this plan applies to, the provisions of the specific area plan are in substitution for, and are in addition to the provisions of: (a) Commercial Zone; (b) Signs Code; and (c) Parking and Sustainable Transport Code: as specified in the relevant provision.

DEV-S1.3 Local Area Objectives

This clause is not used in this specific area plan.

DEV-S1.4 Definition of Terms

Devonport Central Business District	Means the area of land identified on an overlay map as a Central Business zone within the Devonport municipality.
Large format retail	Means a retail outlet with a gross floor area greater than 1000m ²

DEV-S1.5 Use Table

This clause is in substitution of the Commercial Zone – clause 17.2 Use Table

Use Class	Qualification
No Permit Required	
Natural and Cultural Values Management	If for conservation, rehabilitation, or protection against degradation, but must not include a

	building or any outdoor area for information, interpretation, or display of items or for any other use.
Passive Recreation	
Utilities	If for minor utilities.
Permitted	
Bulky Goods Sales	If for the retail sale of: <ul style="list-style-type: none"> (a) furniture and floor coverings; (b) electrical appliances, including white goods and computer equipment; (c) home entertainment equipment; (d) manchester, curtains and blinds; (e) camping and outdoor recreation equipment; (f) office supplies; (g) building, construction and hardware goods; (h) garden and landscape material; (i) auto accessories; (j) pet supplies and ancillary services; or (k) any combination of the goods in (a) to (j).
Food Services	If the total number of Food Service tenancies do not exceed 12 tenancies.
General Retail and Hire	If for a market
Vehicle Fuel Sales and Service	If for a service station.
Discretionary	
Bulky Goods Sales	If for motor vehicle, boat or caravan sales.
Business and Professional Services	If: <ul style="list-style-type: none"> (a) for a post office, consulting room, medical centre, veterinary centre or real estate agent; and (b) located on land contained in CT 167737/15, CT 173536/16 or CT 173536/17.
Education and occasional care	If: <ul style="list-style-type: none"> (a) for a childcare centre; and (b) located on land contained in CT 167737/15, CT 173536/16 or CT 173536/17.
General Retail and Hire	If located on land contained in CT 167737/15, CT 173536/16 or CT 173536/17.
Service Industry	If for car wash, pet wash or laundromat.
Sports and Recreation	If: <ul style="list-style-type: none"> (a) for a fitness centre or gymnasium; and

	(b) located on land contained in CT 167737/15, CT 173536/16 or CT 173536/17.
Storage	If not for a liquid fuel depot or a solid fuel depot.
Utilities	If not listed as No Permit Required.
Prohibited	
All other uses	

DEV-S1.6 Use Standards

DEV-S1.6.1 Use standards

This clause is in substitution for the Commercial Zone – clause 17.3.2 Discretionary uses and clause 17.3.3 Retail impact.

Objective:	
<p>(a) The primacy of the Devonport Central Business District is protected by limitations on the range of permissible Bulky Goods Sales activities; and</p> <p>(b) That uses listed as Discretionary do not compromise or distort the role of other established activity centres in Devonport.</p>	
Acceptable Solutions	Performance Criteria
<p>A1</p> <p>Bulky Goods Sales must be for:</p> <p>(a) furniture and floor coverings;</p> <p>(b) electrical appliances, including white goods and computer equipment;</p> <p>(c) home entertainment equipment;</p> <p>(d) manchester, curtains and blinds;</p> <p>(e) camping and outdoor recreation equipment;</p> <p>(f) building, construction and hardware goods;</p> <p>(g) garden and landscape material;</p> <p>(h) auto accessories;</p> <p>(i) pet supplies and ancillary services; or</p> <p>(j) any combination of the goods in (a) to (i)</p>	<p>P1</p> <p>Bulky goods sales uses must not compromise or distort the role of other activity centres within the Devonport municipality, having regard to:</p> <p>(a) the characteristics of the site;</p> <p>(b) the size and scale of the proposed use;</p> <p>(c) the functions of the activity centre and the surrounding activity centres;</p> <p>(d) the extent that the proposed use impacts on other activity centres; and</p> <p>(e) any relevant local area objectives contained within clause DEV-S1.3.</p>
<p>A2</p> <p>No Acceptable Solution.</p>	<p>P2</p> <p>A use listed as Discretionary, other than Bulky Goods Sales, must not compromise or distort the role of other activity centres within the Devonport municipality, having regard to:</p> <p>(a) the characteristics of the site;</p>

	<ul style="list-style-type: none"> (b) the size and scale of the proposed use; (c) the functions of the activity centre and the surrounding activity centres; (d) the extent that the proposed use impacts on other activity centres; and (e) (e) the purpose of the specific area plan.
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DEV-S1.7 Development Standards

DEV-S1.7.2 Floor areas

Objective:	
The primary of the Devonport Central Business District is protected.	
Acceptable Solutions	Performance Criteria
A1 The total gross floor area of all tenancies must not exceed 40,000m ² .	P1 A development which results in a total gross floor area across all tenancies greater than 40,000m ² , must not compromise or distort the role of other activity centres within the Devonport municipality, having regard to: <ul style="list-style-type: none"> (f) the characteristics of the site; (g) the size and scale of the proposed development; (h) the proposed use(s); (i) the extent that the proposed development would impact on other activity centres; and (e) the purpose of the specific area plan.

DEV-S1.7.2 Setbacks

This clause is in substitution for the Commercial Zone – clause 17.4.2 A1 and P1 Setbacks.

Objective:	
Building setback is compatible with the streetscape and does not unreasonable impact on the amenity of use on adjacent land.	
Acceptable Solutions	Performance Criteria
A1 Buildings and parking areas must: <ul style="list-style-type: none"> (a) have a setback of not less than 20m from the Bass Highway frontage and the setback, or separation distance area must be landscaped in 	P1 Buildings and parking areas must have a setback from a frontage that provides adequate space for landscaping, having regard to: <ul style="list-style-type: none"> (a) the topography of the site;

<p>accordance with a landscape plan approved by the planning authority; and</p> <p>(b) have a setback of not less than 6m from the Stony Rise Road frontage, and</p> <p>(i) allow for the Stony Rise Road carriageway to receive at least 5 hours of sunlight on the 21st of June; and</p> <p>(ii) the setback area, or separation distance area must be landscaped in accordance with a landscape plan approved by the planning authority.</p>	<p>(b) the setback of buildings on adjacent properties; and</p> <p>(c) the safety of pedestrians and road users.</p>
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DEV-S1.7.3 Signs

This clause is in addition to the Signs Code – clause C1.6.1 Design and siting of signs.

Objective:	
<p>(a) The need for signs is recognised; and</p> <p>(b) the impact, size and number of signs does not contribute to visual clutter or cause an unreasonable loss of visual amenity to the surrounding area.</p>	
Acceptable Solutions	Performance Criteria
<p>A1</p> <p>There must be not more than 3 signs located within the setback area from the Bass Highway frontage.</p>	<p>P1</p> <p>No Performance Criterion.</p>
<p>A2</p> <p>The height of a sign must be not more than 10m.</p>	<p>P2</p> <p>No Performance Criterion.</p>
<p>A3</p> <p>There must be not more than 2 signs located within the frontage setback from Stony Rise Road.</p>	<p>P3</p> <p>No Performance Criterion.</p>



DEV-S1.8 Development Standards for Subdivision

This sub-clause is not used in this specific area plan.

Appendix C CV

Emma Riley

Director





Emma is a highly experienced city and regional planner and Director with a successful professional background supporting a range of public, private and not-for-profit organisations.

ERA Planning and Environment is built on Emma's passion for people, place and planning. As Director, Emma provides overall direction and oversight for all ERA projects, and has significant project management experience with large scale planning operations.

Emma has more than 20 years' technical experience and continues to practice as a planner. She has been involved in leading major regulatory reform projects and supports clients in advocating for planning outcomes, presenting to high level boards and committees.

Through ERA, Emma has developed a reputation for successfully taking on some of Tasmania's most challenging, sensitive and high-profile planning, engagement and environmental projects. She has a thorough understanding of community issues in the context of Tasmania.

Emma also regularly appears as an expert witness before the Resource Management and Planning Appeal Tribunal and the Tasmanian Planning Commission.

 Emma Riley
 emma@eraplanning.com.au

Emma Riley

Director



Education

2023

RMIT University, Graduate Certificate of Business Administration

2019

Company Directors Course, Australian Institute of Company Directors

2003

University of New England, Graduate Diploma of Urban and Regional Planning

2000

University of Tasmania, Graduate Diploma of Environment Studies (Hons)

2000

University of Tasmania, Bachelor of Environmental Design

1995

St Mary's College, Hobart

Employment

2011 – Present

ERA Planning and Environment, Director and Principal Planner

2017 – 2018

Tasmanian Government, Chair of Tasmanian Planning Reform Taskforce

2010 – 2012

Southern Tasmanian Councils Authority, Project Manager, Biodiversity Offsets Project

2009 – 2011

Southern Tasmanian Councils Authority, Joint Project Manager, Southern Tasmania Regional Planning Project

2006 – 2010

Planning Institute of Australia, State President of Tasmanian Division

2005 – 2009

GHD Pty Ltd, Senior Consultant Planner

2001 – 2005

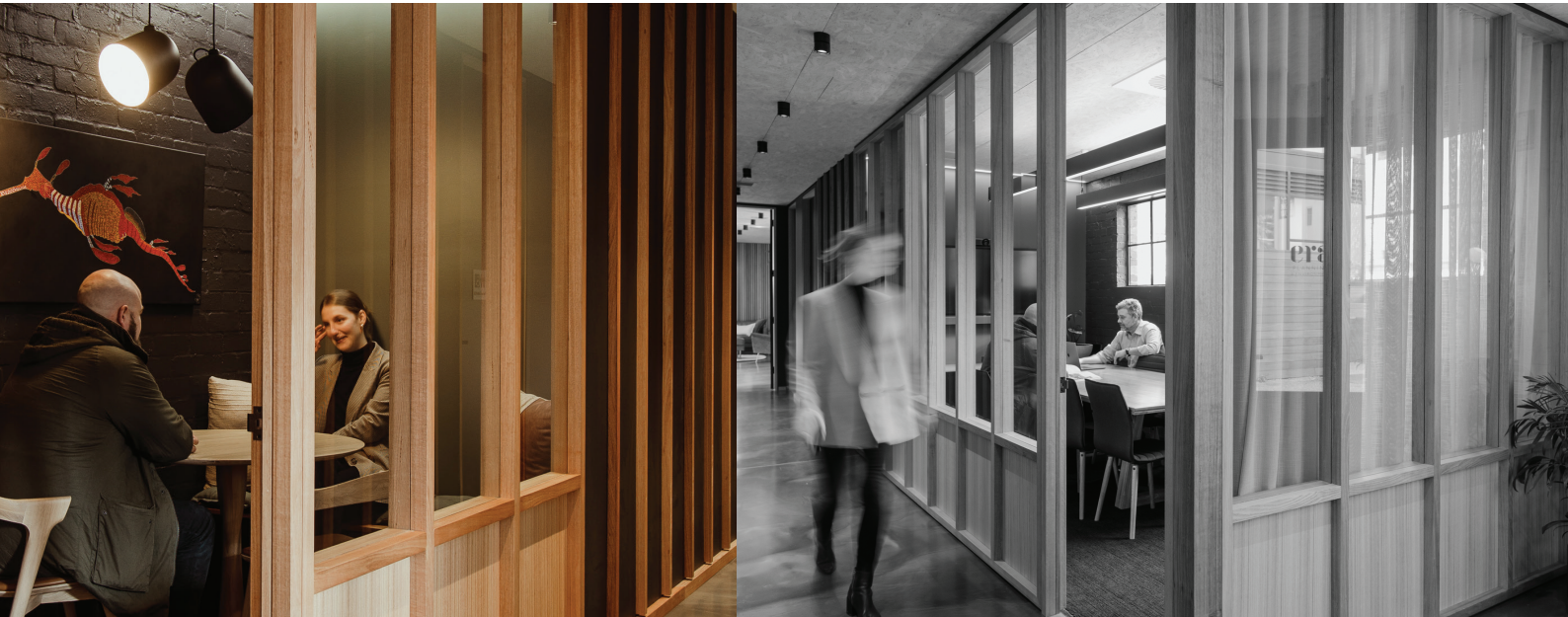
Hobart City Council, Development Appraisal Planner

2000

Davey and Scurrah Financial Planners, Receptionist

1993 – 1999

Target Australia, Receptionist



Professional affiliations

Registered Planner, Planning Institute of Australia

Fellow of the Planning Institute of Australia (PIA)

Graduate of the Australian Institute of Company Directors (AICD)

Current representation

2021 – Present

Chair, Finance, Risk and Audit Committee, Planning Institute of Australia

2021 – Present

National Vice President, Planning Institute of Australia

2018 – Present

National Board Director, Planning Institute of Australia

2021 – Present

Member, St Mary's Cathedral Works Committee

Past representation

2021 – 2022

Inaugural convenor, Women in Planning Network Tasmania, Planning Institute of Australia

2018 – 2021

Member, St Mary's Cathedral Restoration Commission

2017 – 2018

Steering Committee member, Reserve Activity Assessment process review

2014 – 2018

Member, Tasmanian Planning Reform Taskforce

2016 – 2020

Member, University of Tasmania Planning Course Advisory Committee

2010 – 2012

Committee member, Planning Institute of Australia, Tasmanian Division

2010 – 2011

Advisory Committee member, Light Rail Business Case analysis, Department of Infrastructure, Energy and Resources

2006 – 2010

State President, Planning Institute of Australia, Tasmanian Division

2008 – 2009

Member, Building and Construction Industry Advisory Council

2007 – 2008

Member, Affordable Housing Advisory Committee

2007 – 2008

Advisory Committee member, Healthy by Design Guidelines, Heart Foundation

2005 – 2006

Policy Coordinator, Planning Institute of Australia, Tasmania Division

Public presentations and advocacy

2023

ABC News, Interview, *Development Assessment Panel reforms*

2023

ABC News, Interview, *Project of State Significance process*

2023

Tourism Industry Conference speaker, *Agritourism Toolkit: practical tips and hints on your regulatory journey*

2022

Open House Hobart, *Everyone deserves a home*

2021

Tasmanian Major Projects Conference, panellist, *Bringing the project pipeline to fruition*

2019

Planning Institute of Australia Tasmanian State Planning Conference, speaker, *My journey as a planner*

2019

TICT State Conference, joint workshop facilitator, *Development and the planning scheme for tourism developments*

2019

ABC Radio, interview, *The Hobart waterfront, long term thinking*

2019

Legislative Council Select Committee on the Greater Hobart Traffic Congestion, presentation of the Planning Institute of Australia's submission

2018

Environment Institute of Australia and New Zealand Inc. State Conference, speaker, *Development in Reserves/ National Parks: the Cradle Mountain and Freycinet Peninsula master plans*

2017

UTAS, City of Hobart and Glenorchy City Council public forum, speaker, *Integrated Transport and Urban Development*

2015

Tasmanian Leaders Program, panellist, *Urban planning: The Tasmanian Vision*

2011

Property Council of Australia Tasmania Division lunch seminar, speaker, *Planning for Tasmania's southern region over the next 25 years*

2010

The Mercury Newspaper, joint opinion piece, *High-density key to city living*

2009

ABC Radio, interview, *The New Royal Hobart Hospital*

2009

ABC Radio, interview, *RPDC under threat*

2008 – 2009

Tasmanian Times, four part series, *Is the Planning System in Crisis*

2007

The Mercury Newspaper, opinion piece, *Why the railyard is the best site for the new hospital*

2007

The Mercury Newspaper, article, *Should the new Royal Hobart Hospital be moved to the railyards*

2007

The Mercury Newspaper, article, *Pump mill contributes to Tasmania's 'D' in planning*

2007

Legislation Council Select Committee on Housing, presentation of the Planning Institute of Australia's submission

2006

Planning Institute of New Zealand National Conference, speaker, *The politics of planning*

Awards received for personal achievement in planning

2018

Elevated to Fellow, Planning Institute of Australia

2011

Service to the Institute Award, Planning Institute of Australia Tasmania Division

2007

Young Planner of the Year, Planning Institute of Australia Tasmania Division

2004

Management Challenge, National finalist and Tasmanian winner (team member), Local Government Managers Australia

2003

Marjorie Propsting Award for best performing female, University of New England

2003

Planning Institute of Australia NSW Division Award for highest overall grades, University of New England

2003

Planning Institute of Australia Consulting Planners Award for Urban and Regional Planning (most innovative ideas), University of New England

Awards received for professional projects (where project manager)

2021

Commendation in Great Place Award, PIA Tasmanian Division Award for Planning Excellence for Cradle Mountain Gateway (ERA Planning and Environment with Cumulus Studio and Playstreet)

2019

Commendation in Best Planning Ideas – Large Project, PIA Tasmanian Division Award for Planning Excellence for Freycinet Peninsula Master Plan

2017

Best Planning Ideas – Large Project, PIA Tasmanian Division Award for Planning Excellence for New Norfolk Structure Plan

2008

National Commendation Rural & Regional Planning, National PIA Awards for Planning Excellence for Huon Valley Land Use & Development Strategy

2007

Rural & Regional Planning Award for Planning Excellence, PIA Tasmania Division for Huon Valley Land Use & Development Strategy

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STATEMENT OF EVIDENCE

Reference: AP-DEV-AM2022.02

Author: Ellis Davies

Field of expertise: Retail and Property Economics

Filed on behalf of: Tipalea Partners

Date: 21 November 2023

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1. INTRODUCTION

1.1 PREAMBLE

- 1.1.1 This is a Statement of Evidence from Ellis John Davies, Associate Director - Economics of Ethos Urban Pty Ltd, Level 8, 30 Collins Street, Melbourne. I have Bachelor of Commerce and Bachelor of Science degrees from the University of Melbourne.
- 1.1.2 My area of professional expertise is retail and property economics, including the assessment of economic need and impact. I have worked in this field since 2003 and have extensive experience in preparing and peer reviewing economic assessments for activity centres and other land uses. I have represented clients as an expert witness in planning tribunals including before the Land and Environment Court NSW, the Suburban Rail Loop East Inquiry and Advisory Committee in VIC and the Development Assessment Panel (DAP) in WA.
- 1.1.3 Ethos Urban is a member of the Property Council of Australia and I currently sit on the Retail Committee (Victoria).
- 1.1.4 My Curriculum Vitae is attached in Appendix A.
- 1.1.5 I am one of the authors of the Devonport City Council Retail Study ('**Retail Study**') dated 5 August 2022, prepared by Ethos Urban on behalf of the Devonport City Council ('**Council**') attached as Appendix B.
- 1.1.6 I have been engaged by Tipalea Partners via Simmons Wolfhagen to prepare a Statement of Evidence relating to economic and community need and benefit. This is in accordance with the Tasmanian Planning Commission Practice Note 14. In particular, this Statement of Evidence should be considered as an expansion on some of the matters raised within the Retail Study.
- 1.1.7 As part of preparing this Statement of Evidence, I have reviewed the following material:
- i. Devonport City Council Retail Study, August 2022
 - ii. Devonport Living City Master Plan, August 2014
 - iii. Cradle Coast Regional Land Use Strategy 2010 – 2030, May 2022
 - iv. Devonport, Tasmania Economic Impact Assessment, prepared by LocationIQ in October 2021
 - v. Greater Devonport Residential Growth Strategy 2021-2041, finalised June 2022
 - vi. Land Use Planning and Approvals Act 1993
 - vii. Amended DEV-S1.0 Devonport Regional Homemaker Centre and Stony Rise Village Specific Area Plan (SAP)
 - viii. Tasmanian Planning Scheme – Devonport
 - ix. Devonport City Council Strategic Plan 2009-2030, adopted June 2009, revised version adopted April 2019
 - x. Devonport City Council Retail Strategy 2018-2023, adopted June 2018
 - xi. Representation from Ms Therisia Williams of Equilibrium Town Planning on behalf of Goodstone Group, dated 28 November 2022
 - xii. Representation from Ms Victoria Lightfoot of Page Seager Lawyers also on behalf of Goodstone Group, dated 29 November 2022
 - xiii. Representation from Ms Justine Brooks of PDA Surveyors, Engineers & Planners, dated 29 November 2022
 - xiv. Statement of Evidence from Ms Therisa Williams on behalf of Goodstone Group, dated 8 June 2023

- xv. Statement of Evidence of Mr Tom Reilly of GHD Pty Ltd on behalf of Tipalea Partners,
dated 7 June 2023

2. DECLARATION

2.1 DECLARATION

- 2.1.1 This Statement of Evidence has been prepared in accordance with the Tasmanian Planning Commissions Practice Note 14. I have made all enquiries which I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge, been withheld from the Commission.
- 2.1.2 I have attempted at all times in preparing this statement to distinguish between matters of fact, professional opinion and submission.

Signed: 

Date: 21 November 2023

3. BACKGROUND

- 3.1.1 The draft amendment (AP-DEV-AM2022.02), as provided on the Tasmanian Planning Commission website, proposes to:
- i. Delete the Devonport Homemaker Service Industrial Centre Specific Area Plan;
 - ii. Amend the Devonport Regional Homemaker Centre Specific Area Plan by inserting Stony Rise Village Precincts A and B, inserting definitions, and various amendments to the use table, use standards, development standards, sign standards and access standards; and
 - iii. Apply the Devonport Regional Homemaker Centre Specific Area Plan to 1 Friend Street, Stony Rise.
- 3.1.2 I understand that the draft amendment is to facilitate the development of a full-line supermarket together with associated specialty shops, services, large format retail and potentially a medical centre at 5 Friend Street, 88 Stony Rise Road and 90-102 Stony Rise Road, Stony Rise ('**Subject Site**').
- 3.1.3 As I understand the intention is now to seek modification to the draft amendment to remove the current Specific Area Plan ('**SAP**') provisions that apply to the Subject Site, with any future development to rely on the provisions under the Commercial Zone.

4. RETAIL STUDY

- 4.1.1 The Retail Study was commissioned by Council and completed by Ethos Urban in August 2022. It replaced a previous retail study undertaken for Council in 2008.
- 4.1.2 An audit of retail premises in the City of Devonport ('**Devonport**') was undertaken as part of the Retail Study. The audit found that Devonport contained an estimated 84,840 sq.m of occupied retail floorspace. The vacancy rate of retail floorspace was estimated at 3.9%, which is considered low and healthy for a regional city.
- 4.1.3 The Retail Study found that since 2008 the amount of retail floorspace in Devonport increased by an estimated 22,200 sq.m. A range of new developments contributed to the increase such as the Devonport Homemaker Centre, Hill Street Grocer, IGA Spreyton and various outlets on the fringe of the Devonport CBD.
- 4.1.4 A retail floorspace demand and supply analysis was undertaken as part of the Retail Study. The analysis estimates that at 2021 there was a shortfall of retail floorspace in the order of 10,000 sq.m in Devonport. This includes an estimated 4,390 sq.m of Food retail floorspace, 5,450 sq.m of Non-Food floorspace and 160 sq.m of Retail Services floorspace.
- 4.1.5 An assessed need for a total of approximately 24,070 sq.m of additional retail floorspace in Devonport by 2036 was identified by the Retail Study. This includes an estimated 9,190 sq.m of Food retail floorspace, 14,030 sq.m of Non-Food floorspace and 850 sq.m of Retail Services floorspace.
- 4.1.6 The analysis of future retail floorspace demand provided in the Retail Study is based on the increasing retail spending capacity of existing and future residents in Devonport and throughout the surrounding region. The Retail Study outlines that the population of Devonport is projected to increase from 26,920 persons at 2021 to reach 28,820 residents at 2036.

5. RETAIL FLOORSPACE GAP ANALYSIS

- 5.1.1 The retail floorspace analysis in the Retail Study focuses on the categories of Food, Non-Food and Retail Services. To understand the retail floorspace need at a more granular level, the retail floorspace analysis has been updated as follows:

- i. Dividing the Food category into **Food, Liquor and Groceries (FLG)**, which includes spending at supermarkets, fresh food stores and liquor outlets, and **Food Catering**, which includes spending at cafes, restaurants and takeaway food stores; and
- ii. Dividing the Non-Food category in **Other Non-Food** and **Large Format Retail**.

5.1.2 Table 1 below replicates Table 6.3 from the Retail Study showing the more detailed retail categories. The analysis uses data and assumptions provided in the Retail Study where possible, with some additional assumptions adopted at the more detailed category level for the estimated share of sales from beyond Devonport and the supportable trading levels, as shown.

TABLE 1: RETAIL FLOORSPACE ANALYSIS, DEVONPORT, 2021

Item	Food, Liquor & Groceries	Food Catering	Other Non-Food	Large Format Retail	Services	Total
Devonport Retail Spending 2021 (\$m)	\$163.6	\$36.4	\$78.9	\$64.5	\$11.7	\$355.1
Spending Potentially Retained (%)	90%	90%	80%	80%	95%	86%
Potential Spending Retained (\$m)	\$147.2	\$32.8	\$63.1	\$51.6	\$11.1	\$305.8
Est. Share of Sales from Beyond Devonport (%)	27.5%	55%	52.5%	57%	30%	44%
Retail Sales Available for Devonport Retailers (\$m)	\$203.2	\$72.9	\$133.0	\$120.3	\$15.8	\$545.2
Supportable Trading Level (\$ per sq.m)	\$10,500	\$7,000	\$4,200	\$4,100	\$4,000	\$5,749
Retail Floorspace Demand (sq.m)	19,440	10,410	31,660	29,370	3,960	94,840
Current Retail Floorspace (sq.m)	16,150	9,310	29,390	26,190	3,800	84,840
Est. Retail Floorspace Shortfall (sq.m)	3,290	1,100	2,270	3,180	160	10,000

Source: MarketInfo; Ethos Urban (Retail Study)

5.1.3 The analysis of future retail demand from the Retail Study has also been updated for the more detailed retail categories. The following Table 2 replicates Table 6.5 from the Retail Study with the additional retail categories. It also provides the supportable retail floorspace estimates at 5-year increments over the forecast period to 2036. The total retail floorspace supportable at each time period is the amount of additional retail floorspace expected to be sustainable in Devonport on top of the existing provision at 2021.

TABLE 2: INDICATIVE ADDITIONAL RETAIL FLOORSPACE SUPPORTABLE, DEVONPORT, 2021 – 2036

Item	Food, Liquor & Groceries	Food Catering	Other Non-Food	Large Format Retail	Services	Total
<u>Sales Available to New Retail Facilities @80% of Growth (\$m)</u>						
2021-2026	10.5	4.1	6.2	5.6	0.9	27.2
2026-2031	11.8	4.6	6.9	6.2	1.0	30.6
2031-2036	<u>13.9</u>	<u>5.4</u>	<u>8.2</u>	<u>7.4</u>	<u>1.2</u>	<u>36.0</u>
Total 2021 - 2036	36.1	14.2	21.2	19.2	3.1	93.8
<u>Additional Supportable Retail Floorspace</u>						
<i>Ave. Sales for New Retail F'space 21-26*(\$ per sq.m)</i>	11,000	8,000	4,600	4,400	4,250	6,670
Additional Floorspace Demand (sq.m)						
2021-2026	950	510	1,340	1,270	210	4,280
2026-2031	1,020	550	1,440	1,360	230	4,600
2031-2036	<u>1,150</u>	<u>620</u>	<u>1,630</u>	<u>1,540</u>	<u>250</u>	<u>5,190</u>
Total Additional Retail Demand 2021 - 2036	3,120	1,680	4,410	4,170	690	14,070
<u>Est. Total Retail Floorspace Supportable (sq.m)</u>						
As at 2021 (Refer Table 1 above)	3,290	1,100	2,270	3,180	160	10,000
As at 2026	4,240	1,610	3,610	4,450	370	14,280
As at 2031	5,260	2,160	5,050	5,810	600	18,880
As at 2036	6,410	2,780	6,680	7,350	850	24,070

Source: MarketInfo; Ethos Urban (Retail Study)

6. RESIDENTIAL GROWTH STRATEGY AND VISITORS

6.1 RESIDENTIAL GROWTH STRATEGY

- 6.1.1 The Greater Devonport Residential Growth Strategy 2021-2041 (**'Growth Strategy'**) was prepared by Devonport City Council with the final report issued 27 June 2022.
- 6.1.2 The stated purpose of the Growth Strategy is to *"provide an overarching strategic policy direction for residential growth in the greater Devonport area over the next 20 years."*
- 6.1.3 The policy actions endorsed by the Growth Strategy included aspirational population growth targets with a key objective to *"Actively encourage population growth to recognise and enhance Devonport's status as the major population centre in the North-West region and to promote Devonport as an attractive and prominent destination to live, work and invest."*
- 6.1.4 The aspirational population growth target detailed in the Growth Strategy is 30,000 residents by the year 2030 and 35,000 by the year 2040. The aspirational population target at 2036 is 33,450, as detailed in Table A4.2 from the Growth Strategy.

6.2 IMPLICATIONS ON FLOORSPACE DEMAND FROM HIGHER POPULATION GROWTH

- 6.2.1 The Growth Strategy stated aspirational population growth target of 33,450 people for Devonport at 2036 is approximately +4,630 residents, or some +16% higher than the population projection provided in the Retail Study of 28,820 at 2036.
- 6.2.2 A higher population of an area contributes directly to an increase in demand for retail floorspace. The Retail Study notes that if a stronger rate of population growth occurs in Devonport, then the assessed need for additional retail floorspace may be higher than estimated (page 39 of the Retail Study).
- 6.2.3 If the aspirational population growth target for Devonport is realised, the need for retail floorspace would be higher than the figures provided in the Retail Study. In broad terms, the additional 4,630 residents would create the need for approximately 9,720 sq.m of retail floorspace (assuming an average provision of 2.1 sq.m per person), of which up to 7,780 sq.m could be potentially supported in Devonport (assuming an 80% retention rate).
- 6.2.4 In summary, if the aspirational population target of 33,450 persons at 2036 was achieved, the total amount of additional retail floorspace supportable in Devonport is estimated at up to 31,850 sq.m on top of 2021 levels. This is relative to 24,070 sq.m above 2021 levels as assessed in Retail Study.

6.3 IMPLICATIONS ON FLOORSPACE DEMAND FROM INCREASED VISITORS

- 6.3.1 In the 2023 financial year just over 450,000 passengers arrived in Devonport via the Spirit of Tasmania ferries. New Spirit of Tasmania ferries, which are to be delivered in 2024, along with a new terminal at East Devonport, will greatly increase ferry passenger capacity. All the vehicle lanes in the new vessels will have extra height that can accommodate caravans and campervans.
- 6.3.2 A report undertaken by ERA Planning & Environment, *Planning for the New Spirit of Tasmania Vessels*, which is anticipated to be released shortly, provides information on the expected increased usage as a result of the new vessels. The new ferries are expected to bring an estimated additional 78,000 passenger vehicles into Devonport per year by 2030 (Deloitte Access Economics, 2019), including up to 17,000 additional caravan and campervan travellers (BDA, 2022).
- 6.3.3 Visitors to an area contribute significantly to the local economy, particularly overnight visitors. The upgraded East Devonport terminal and new Spirit of Tasmania ferries will allow for increased visitor numbers to Devonport. The increase in visitors to Devonport will result in additional spending, particularly on accommodation, shopping and food services. The

increased spending on shopping and food services will add to the demand for retail floorspace in Devonport, particularly in East Devonport and the Devonport CBD.

- 6.3.4 In August 2023, domestic overnight visitors spent an average of \$1,075 per trip, according to data from Tourism Research Australia. Of total domestic overnight visitor spend, approximately 28% is on food and drink and 8% on shopping. Therefore, the increase in visitors to Devonport as a result of the improved ferries and port infrastructure is expected to clearly add to the overall demand for retail floorspace in Devonport.
- 6.3.5 Visitors with caravans and motorhomes would have a different spending profile to other visitors and would utilise local shopping facilities, particularly supermarkets, to purchase food and groceries for their trip.

7. SECTION 32(4) OF THE ACT

- 7.1.1 Under Part 3A – Local Provisions Schedules (LPS), Section 32 of the Land Use Planning and Approvals Act 1993 ('Act') provides:

(4) An LPS may only include a provision referred to in subsection (3) in relation to an area of land if –

(a) a use or development to which the provision relates is of significant social, economic or environmental benefit to the State, a region or a municipal area;

(b) the area of land has particular environmental, economic, social or spatial qualities that require provisions, that are unique to the area of land, to apply to the land in substitution for, or in addition to, or modification of, the provisions of the SPPs.

- 7.1.2 As outlined in the following Section 8 of this Statement of Evidence, the provision of additional land suitably zoned for food and grocery related retail will have significant economic and social benefits for the municipal area of Devonport.

8. ECONOMIC AND COMMUNITY BENEFITS

8.1 ECONOMIC AND COMMUNITY BENEFITS

- 8.1.1 The provision of additional commercial zoned land for food, grocery and convenience retail that meets the daily shopping needs of residents will result in a range of significant economic and community benefits, as outlined following.

8.2 ENSURING AN ADEQUATE PROVISION OF RETAIL AND SUPERMARKETS IN DEVONPORT

- 8.2.1 Retail shops, including supermarkets, provide an essential service for the community. It is important that communities are provided with an appropriate scale and range of retail uses, particularly supermarkets, to meet their daily needs. An appropriate provision of convenience retail at appropriate locations provide convenience and amenity for residents, as well as create a meeting place and focus for community interaction.
- 8.2.2 The provision of convenient, good quality supermarket facilities is particularly important to serve the needs of the local population as well as support the social and economic well-being of the community. No other retail format is visited more often by a greater share of the population than supermarkets.
- 8.2.3 A lack of convenience retail and supermarket facilities in an area can have a range of detrimental impacts related to liveability, amenity, economic opportunity and social engagement.

- 8.2.4 At present in Devonport six supermarkets are over 500 sq m in size (which is a figure typical adopted in the retail industry to define a supermarket) as well as three foodstores ranging in size from 200 – 400 sq.m.
- 8.2.5 Of the six supermarkets, only two are full-line supermarkets that offer a full range of food and grocery products typically provided in a major supermarket.
- 8.2.6 The Retail Study, as well as the additional analysis provided in this Statement of Evidence, demonstrates an undersupply of retail and supermarket floorspace already exists in Devonport. This undersupply of retail floorspace will become more severe in the future if additional retail facilities are not developed in Devonport. The proposed development at the Subject Site will add to supply of retail and supermarket floorspace in Devonport within an existing commercial centre.

8.3 PROVIDING ANOTHER FULL-LINE SUPERMARKET FOR THE COMMUNITY

- 8.3.1 It is important to understand at a fundamental level the importance of full-line supermarkets to general community well-being. Supermarkets are a critical component of the retail sector in terms of meeting the most basic food, grocery and other household needs required to support a contemporary lifestyle in Australia.
- 8.3.2 The term ‘full-line supermarket’ describes a store containing the full range of grocery products typically sold in a major supermarket. The trading characteristics and usage patterns for full-line supermarkets are generally different to those of smaller limited-range supermarkets and specialist traders such as ALDI, most IGA stores and selected large fresh food stores. While no strict definition of a full-line supermarket exists, it is generally accepted that supermarkets of 2,500 sq.m in size or smaller are not full-line stores, with full-line supermarkets typically at least 3,200 sq.m or larger in size.
- 8.3.3 A new full-line supermarket in Devonport would be able to provide a comprehensive range of food and grocery products. This is in contrast to small and medium sized supermarkets which lack the size and scale to provide a comprehensive grocery shopping offer for consumers. A particular difference between full-line supermarkets and small/mid-sized supermarkets is the greater provision of fresh food product categories. In this respect most full-line supermarkets include:
- i. Full range of fresh dairy produce
 - ii. Delicatessen
 - iii. Fresh seafood
 - iv. Broad range of packaged meat products
 - v. Inhouse bakery
 - vi. Extensive range of fresh fruit and vegetables.
- 8.3.4 The strong destinational appeal of full-line supermarkets is reflected in well-established and observed patterns of consumer behaviour across Australia. Full-line supermarkets act as an important anchor tenant which attract strong and consistent levels of customer visitation that supports the viability of other retailers, as well as other commercial and community uses. Full-line supermarkets also often provide services that are not typically offered at smaller supermarkets such as dedicated online shopping/pick-up facilities.
- 8.3.5 At present, only two full-line supermarkets are located in Devonport, being the Coles and Woolworths supermarkets in the Devonport CBD. Residents wanting to access a product range available at a typical full-line supermarket must travel into the Devonport CBD, where the two supermarkets are co-located.

- 8.3.6 The population of Devonport, at over 27,000 persons, can sustain another full-line supermarket. Furthermore, given the scale of Devonport as well as the position and scale of the existing supermarkets, a location outside the CBD is appropriate.
- 8.3.7 In summary, the provision of a full-line supermarket at the Subject Site, which is highly convenient to access particularly for residents in the southern part of Devonport, would provide a significant benefit to the community by providing a full-line supermarket that is easily accessible.

8.4 INCREASED CONSUMER CHOICE AND CONVENIENCE

- 8.4.1 Provision of commercial land in the southern part of Devonport would greatly increase choice and convenience for residents. It would allow for the provision of convenience-based shopping facilities at a highly accessible location, close to the Bass Highway and residential areas. The provision of additional retail facilities and services at the Subject Site would allow residents in the surrounding area, and particularly to the south of the Bass Highway, to conveniently access a shopping centre that meets their day-to-day shopping needs.
- 8.4.2 Residents living south of the Bass Highway can access the small IGA supermarket at Spreyton although they do not have convenience access to a full-line supermarket. Stony Rise is well located to accommodate food and grocery retail which would increase choice for local residents. In particular, it would allow residents in the surrounding area to undertake some of their daily and weekly food and grocery shopping without the need to travel into the Devonport CBD. Notwithstanding this, I also expect residents to continue to regularly visit the Devonport CBD for a range of reasons, particularly for non-food shopping, although also for supermarket shopping.

8.5 CATER TO THE DEMONSTRATED NEED FOR ADDITIONAL RETAIL FLOORSPACE

- 8.5.1 As detailed in the Retail Study, and expanded in this Statement of Evidence, additional retail floorspace, including supermarkets, is required in Devonport to effectively serve the needs of the community. The proposed development would cater to some of this demonstrated need for increased retail floorspace in Devonport and would respond to customer demand for additional supermarkets in the area.
- 8.5.2 A clear undersupply of supermarket floorspace is evident in Devonport, particularly full-line supermarkets. This undersupply of supermarket floorspace is more pronounced in the southern part of Devonport, where households do not have convenient access to a full-line supermarket.
- 8.5.3 Additional land in a highly accessible location would allow for the provision of daily food, grocery and convenience retail to serve the needs of the local community. The Subject Site is, in my opinion, an appropriate location for such uses as it forms part of an established activity centre and any additional retail facilities would complement the existing commercial uses at the locality.
- 8.5.4 Large format retail precincts often include uses that serve the daily food and grocery needs of patrons. As an example in Tasmania, The Local Grocer, which provides fresh produce and grocery items, opened at the Cambridge Homemaker Centre in 2021.
- 8.5.5 Given the clear demonstrated need for additional retail floorspace in Devonport, and that the proposed development is supported by the available market, I do not consider that the provision of additional land at Stony Rise for retail activity would have undue adverse impacts on other activity centres in Devonport including the Devonport CBD.

8.6 GENERATING INVESTMENT AND CREATING EMPLOYMENT OPPORTUNITIES IN THE LOCAL AREA

- 8.6.1 The provision of additional commercial zoned land for convenience retail in Stony Rise would facilitate investment in Devonport and would create local employment, contributing to

economic and community well-being. New retail facilities at Stony Rise, once operational, will provide a range of ongoing full-time, part-time and casual positions which will allow people with various levels of experience to participate in paid employment. A significant number of jobs for the construction and related industries would be created during the construction phase of any future retail development.

9. DEVONPORT ACTIVITY CENTRES HIERARCHY

9.1 TASMANIAN PLANNING SCHEME

- 9.1.1 The Tasmanian Planning Scheme ('TPS') provides the following planning terms and definitions in Table 3.1:

Activity centre – means a place that provides a focus for retail, commercial, services, employment, and social interaction in cities and towns.

Activity centre hierarchy – means the activity centre network or hierarchy referred to in a relevant regional land use strategy.

- 9.1.2 The land use zones provided in the TPS which are most relevant for activity centres in the Devonport municipality are as follows:

- i. Central Business: This zone applies to primary centres and covers the Devonport CBD.
- ii. General Business: This zone applies to main suburban and rural centres and covers Fourways.
- iii. Local Business: This zone applies to centres supporting local areas, which covers numerous retail centres or nodes located throughout Devonport.
- iv. Urban Mixed Use: This zone provides for a mix of uses in urban locations including residential, retail, community and commercial use. Land surrounding the Devonport CBD and along William Street south of Fourways is located within this zone.
- v. Commercial: This zone provides for retailing, service industries, storage and warehousing requiring large floor areas. The Don Road strip, land along Formby Road north of the Bass Highway and the Devonport Homemaker Centre precinct are located within this zone.

9.2 CRADLE COAST REGIONAL LAND USE STRATEGY 2010 – 2030

- 9.2.1 The Cradle Coast Regional Land Use Strategy 2010 - 2030 dated 11 May 2022 ('**Regional Land Use Strategy**') is considered the relevant regional land use strategy for Devonport.

- 9.2.2 In Section 3.5.2 Land for Retail, Business and Professional Service of the Regional Land Use Strategy, it provides the following:

Retail and service activity is a significant part of the regional economy.

Prospects for commercial and business activity are closely aligned to current and future population and to the capacity for economic activity to sustain a high proportion of the Region's workforce.

There is a strong public interest component in planning strategically for an aggregation of business and commercial land uses to support liveability and the wellbeing of communities. Designation of commercial centres allows ease of access to consumer goods and services and create places which provide a centre for community activity.

Emphasis must be given retaining attraction and function of existing commercial centres. Policies must accommodate opportunities to provide a range of retail and business activity by enabling development that will enhance established character and

identity. Capacity of a town centre to provide a vibrant and functional commercial space generates efficiencies in social, economic and infrastructure.

Land use planning must be careful to avoid restraint on competition and the efficient market function of commercial centres through requirements which direct or restrict entry and distribution in the type of commercial development in order to build capacity or protect viability of existing business.

Settlement structure planning should encourage appropriate and sensitive redevelopment and rationalisation. Expansion at the fringe of existing centres is preferred over new locations to concentrate retail and commercial activity into geographically confined yet highly accessible locations. New retail and business activity should be directed to existing commercial locations unless necessary to serve requirements resulting from growth in local populations.

9.2.3 In Section 4.7, Settlement Capability - Access to Services, the following statement is provided:

Activity centre policy is intended to encourage particular types of activities to co-locate under a designated hierarchy in which settlement centres are described by size, type, location and distribution. The concept involves directed action to discourage development which is outside this model. The rationale is to improve the accessibility, productivity, complementarities and efficiency in use of larger scale and single-site activities to meet a wider population need. The model retains ability to provide a single local destination that will meet the majority of people's daily needs.*

**Centres are variously described on a hierarchy of scale as city centres, major regional centres, district centres, suburban centres and local centres.*

9.2.4 The Regional Land Use Strategy classifies Devonport, together with Burnie, as Regional Activity Centres, the highest order activity centre classification. The stated centre description of Regional Activity Centre is as follows:

Provide services and facilities which deliver for needs of the local community together with a wider regional or subregional catchment.

These towns offer higher order services reliant for operational efficiency on a population of regional or sub-regional size or on a single or limited number of locations in education, health, culture and entertainment, community support, professional and personal service, comparison and specialty retail, sport and recreation, and diversity in housing options.

Major centres are primary nodes for industry, business, public sector, and transport activities with a regional focus; and offer a range of employment options.

9.3 DRAFT RETAIL ACTIVITY CENTRE HIERARCHY DEVONPORT LOCAL GOVERNMENT AREA

9.3.1 At the Ordinary Council meeting of the Devonport City Council on 22 August 2022, the Retail Study was received and noted by Council.

9.3.2 As a response to the Retail Study, Council Officers prepared the Draft Retail Activity Centre Hierarchy Devonport Local Government Area (**'Draft Activity Centre Hierarchy'**), which was included as an attachment to the Council meeting agenda. The agenda for the Devonport Retail Study 2022 item included the following:

The purpose of a retail activity hierarchy is to define and describe the specific role, function and theme of each retail centre in the Devonport local government area. This represents a common practice approach that exists in other jurisdictions within the State, provides an effective means of planning for future growth, and will assist to guide and inform decision making around investment, land use planning, and

economic development in a logical and justifiable way in accordance with the desired role and function of each centre and their attributes.

It further aims to promote efficiencies and foster a complementary relationship between activity centres, rather than creating undesirable duplication or competition between centres.

9.3.3 The Draft Activity Centre Hierarchy provides the role and core functions for five different activity centre types as follows:

- i. Primary Activity Centre (Devonport CBD and surrounds including Fourways)
- ii. Local Suburban Centre (East Devonport and Spreyton)
- iii. Peripheral Activity Centre (William Street south of Fourways, Don Road and Formby Road)
- iv. Local Neighbourhood Centre (Valley Road, Forbes Street and Southern East Devonport)
- v. Specialist Centre (Devonport Homemaker Centre)

9.3.4 Of most relevant to the subject proposal is the role and core functions of Specialist Centre, which includes the following:

Role - To provide for activity of a specialised nature including as defined through a unique local provision under the planning scheme (such as a specific area plan or particular purpose zone).

Core Functions (Retail and Commercial Provision) - Should reflect the specific purpose or defined character of the specialist centre.

9.3.5 Based on a review and consideration of relevant policy, subject to my expertise, the provision of additional commercial zoned land for retail activity in Stony Rise is consistent with the activity centre hierarchy policy and the proposed development would not have an adverse impact on the draft activity centre hierarchy for Devonport.

10. APPENDIX A: CURRICULUM VITAE

Ellis John Davies

Associate Director, Economics

Ethos Urban
Level 8, 30 Collins Street
Melbourne VIC 3000



PROFESSIONAL SUMMARY

Ellis is a retail and property economist with extensive experience having worked in the activity centre and retail industry since 2003. Before joining Ethos Urban he worked at Macroplan, Myer and Dimasi Strategic Research. He studied at the University of Melbourne and graduated with a Bachelor of Commerce and a Bachelor of Science in 2002.

Ellis has provided advice to a wide range of private clients, including many leading retailers and major shopping centre groups, as well as numerous public clients, including State Government entities and Local Governments. He has experience in all states and territories of Australia.

Ellis has worked on a broad range of projects including supply and demand analyses, network plans, market assessments and economic impact assessments. He has also represented clients as an expert witness in planning tribunals.

PROFESSIONAL EXPERIENCE

Associate Director - Economics, Ethos Urban (August 2021 – present)

Ethos Urban is a leading consultancy company that offers a range of services including economic, planning, engagement and project management. The position in the Economics team involves leading activity centre and retail projects with a focus on economic and market assessments and strategies.

General Manager - Retail, Macroplan (January 2011 – August 2021)

Macroplan provides economic and retail market analysis to a broad range of leading retailers and major shopping centre owners throughout Australia. The position involved working on a wide range of economic reports including Network Strategies, Economic Impact Assessments, Retail Demand Analyses, Retail Sales Assessments, Sales Impact Analyses and Trade Area Analyses, and included using a broad range of datasets including ABS data, MarketInfo and Quantum transaction data.

Senior Operations Analyst, Myer (February 2008 – December 2010)

The position was within the National Store Operations department of Myer and primarily focused on identifying opportunities to improve the labour and operating efficiencies throughout the Myer network of stores.

Business Analyst, Employment Opportunities (London) (January 2007 – May 2007)

Employment Opportunities is a major employment agency based in London with offices throughout the United Kingdom. The position as a business analyst was to assist the company in bidding for business contracts with various government departments including Pathways to Work.

Consultant, Dimasi Strategic Research/MapInfo Dimasi (March 2003 – July 2006)

Dimasi Strategic Research provided economic and market analysis to a range of retailers and shopping centre owners throughout Australia and New Zealand. The position involved working on a wide range of reports including Economic Impact Assessments, Retail Demand Analysis, Retail Sales Assessments, Sales Impact Analysis, Strategic Reviews and Trade Area Analysis.

EDUCATION

The University of Melbourne

- Bachelor of Commerce (Majoring in Economics)
- Bachelor of Science (Majoring in Statistics)

RECENT PROJECT EXPERIENCE

VICTORIA

Covid-19 Impacts: Analysis of population projections at SA2 level. Client: Coles

Essendon Fields: Assessment of Retail Market Potential. Client: Essendon Fields

Woolworths Glen Iris: Economic Impact Assessment. Client: Time & Place

Southern Cross Station: Review of Retail Potential. Client: Infranexus

Melbourne Metro Rail: Assessment of Retail Potential at Future Stations. Client: Capella Capital

Activity Centre Analysis: Preston, Northcote, Reservoir and Preston East. Client: City of Darebin

Bannockburn South East PSP: Economic and Retail Assessment. Client: VPA

Northcote Plaza: Economic Impact Assessment for Centre Redevelopment. Client: Private

TASMANIA

Devonport Retail Study. Client: Devonport City Council

NSW & ACT

Chatswood Chase: Centre Expansion Scheme Assessment. Client: Vicinity Centres

Kellyville & Bella Vista Station Precincts: Assessment of Commercial Potential. Client Landcom

Eastern Creek Quarter: Strategic Retail Analysis. Client: Frasers Property

Ed. Square Town Centre: Assessment of Retail Potential and Strategic Advice. Client: Frasers Property

Lindfield Village Hub: Assessment of Retail Potential. Client: Ku-ring-gai Council

Calderwood Village Centre: Economic Needs Assessment for New Centre. Client: Revelop

Club Banora Retail Centre: Economic Impact Assessment. Client: Colliers

Garema Place and City Walk, ACT: Retail Study & Case Study Analysis. Client: City Renewal Authority

Macarthur Precinct, ACT: Assessment of potential for retail facilities. Client: Art Group

QUEENSLAND

Pimpama: Assessment of Supermarket Potential and Catchment Analysis. Client: Spano Group

Logan Village: Economic Impact and Needs Assessment. Client: Private

Everleigh Town Centre: Economic Needs Assessment for New Centre. Client: Mirvac

The Strand Coolangatta: Assessment of Retail Sales Potential. Client: Vinta

Brisbane CBD: Assessment of Supermarket Potential. Client: Coles

The Markets West End: Trade Area Analysis and Centre Outlook. Client: SCA Property

WESTERN AUSTRALIA

Kingsford Town Centre: Market Assessment. Client: Prime Projects

Morrison Road NAC, Midvale: Retail Sustainability Assessment (and mediation). Client: Saracen Properties

Millars Landing North: Local Structure Plan Review. Client: City of Rockingham

Elizabeth Quay: Assessment of Retail Potential. Client: Brookfield

Karrinyup SC: Shopping Centre Expansion Scheme Assessment. Client: AMP Capital

11. APPENDIX B: RETAIL STUDY

Devonport City Council

Retail Study

Authorship

Report stage	Author	Review	Date
Draft report	Ellis Davies Emma Keller	Nick Brisbane	29 June 2022
Final report			5 August 2022

Disclaimer

Every effort has been made to ensure the accuracy of the material and the integrity of the analysis presented in this report. However, Ethos Urban Pty Ltd accepts no liability for any actions taken on the basis of report contents.

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Executive Summary

Retail Study Context

- 1 A comprehensive Retail Study was undertaken for Council in 2008, which explored the importance of retailing as an economic activity in Devonport and investigated where future retail facilities should be provided. Since 2008 Devonport has experienced strong population growth, which has driven new commercial and retail development in the area.
- 2 Ethos Urban has been commissioned to undertake a new Retail Study to assist Devonport City Council in gaining an understanding of the current retail landscape of Devonport, and to identify the most appropriate future retail development opportunities to serve the needs of the growing community.
- 3 A current Retail Study will assist Council in guiding and encouraging appropriate retail development throughout Devonport to ensure the retail sector can meet the needs of local residents as well as visitors to the area.

Economic and Policy Overview

- 4 The agriculture, forestry and fishing (14.4%), health care and social assistance (11.9%) and construction (9.3%) industries were the main contributors to the Devonport Region's Gross Regional Product in 2021. The 'Devonport Region' is defined as the combination of the municipalities of Devonport, Kentish, Central Coast and Latrobe.
- 5 ABS Census data shows that the major economic sectors in which Devonport residents are employed are health care and social assistance (14.9%), retail trade (13.1%) and manufacturing (10.0%).
- 6 Devonport's tourism sector plays a key role in the local and regional economy for Tasmania. Hosting the Spirit of Tasmania ferry, Devonport is a popular gateway to north-west Tasmania and beyond, including major tourism attractions such as Cradle Mountain. In 2019, with this year being a pre-COVID business-as-usual benchmark, Devonport attracted a total of approximately 184,000 domestic overnight visitors and 343,430 day trips to the region. There were a further 15,280 international visitors spending a total of 319,000 nights in the area.
- 7 A number of macro trends are currently influencing the land use composition and viability of retail facilities, including shifts in demographics, changing consumer preferences, the growth of online and impacts from the COVID-19 pandemic.
- 8 Devonport's LIVING CITY is the largest urban renewal project undertaken in regional Tasmania and is transforming Devonport by creating a cultural heart, opening the city up to the waterfront, and further establishing the city as a key destination for business activity and visitors. Northern areas of the CBD, being the new retail precinct, civic precinct and waterfront, are seeing the greatest change from LIVING CITY, with ongoing development occurring in this area. This includes the new multi-purpose civic building, the Paranaple Centre, which hosts a library, customer service centre, council offices, and a conference centre, as well as construction of the waterfront precinct.

Retail Catchment Analysis

- 9 A retail catchment has been defined which includes the municipalities of Devonport, Latrobe, Kentish and Central Coast. The combination of these areas is referred to as the Devonport Retail Catchment.

- 10 In mid-2021, the population of Devonport Retail Catchment is estimated at 69,700 persons including 26,900 residents in the City of Devonport. Future growth in the Devonport Retail Catchment is projected to result in the population reaching 76,900 residents by 2036 including 28,800 persons in the City of Devonport.
- 11 The total retail spending capacity of the Devonport Retail Catchment population is estimated at \$939 million in 2021, including \$431 million of FLG spending. Retail spending is projected to increase strongly over the forecast period to reach \$1.18 billion at 2036, including \$544 million of FLG spending.

Consultation

- 12 High-level consultation with key stakeholders, as identified by the City of Devonport, found that the Devonport CBD is generally considered an effective hub for retail activity, though the built form, quality of some shops, level of on-grade carparking and promotion activity could be improved. In the future, stakeholders discussed the need for additional retail facilities to serve the growing community, particularly additional large format retail uses and neighbourhood centres outside of the CBD.

Hierarchy of Retail Centres

- 13 In total there is an estimated 84,840 sq.m of occupied retail floorspace across the various centres in Devonport. Close to half is provided within, or near, the Devonport CBD, while the other largest centres in terms of retail floorspace are Devonport Homemaker Centre, Don Road and Fourways.
- 14 According to retail survey there was a total of 3,480 sq.m of vacant shopfront floorspace which would be suitable for retail uses. This reflects a vacancy rate of 3.9%, which is considered low and healthy for a regional city. However, some centres have vacancy rates over 10.0%, including Devonport East Village, Fourways and Forbes Street, which should be closely monitored to ensure the level of vacancy does not increase further.
- 15 Since 2008, the amount of retail floorspace in Devonport has increased by an estimated 22,200 sq.m. Some of the most notable changes include the development of the Devonport Homemaker Centre and additional retail uses on the fringe of the CBD including Hill Street Grocer and some new large format retail outlets.

Retail Turnover and Demand Analysis

- 16 Total turnover at all retail facilities in the City of Devonport is estimated at \$504.5 million, including an estimated \$295.8 million in retail turnover at shops located in the Devonport CBD and surrounds.
- 17 Retail outlets in the City of Devonport generate approximately \$295.4 million of retail turnover which can be attributed to residents in the municipality, representing approximately 59% of total retail sales in Devonport. The balance, or 41% of retail turnover in Devonport, is estimated to be derived from spending by non-residents.
- 18 As at 2021 escape spending by Devonport residents is estimated at \$60 million. In other words, \$60 million of retail expenditure of residents in Devonport is expected to be directed to retail facilities located outside Devonport. This represents approximately 17% of the total available retail spending by residents of Devonport. This estimated level of escape spending is considered to be in line with expectations of a dynamic retail sector, with the current provision of retail facilities able to largely meet the needs of the local community.
- 19 An analysis of retail floorspace demand indicates that there is a current shortfall of retail floorspace in the order of 10,000 sq.m in Devonport. This indicates that the scale of retail

floorspace in Devonport broadly meets the needs of customers, though there is potential for some additional retail floorspace to be supported.

- 20 An analysis of future retail floorspace need created by population growth finds that there is the potential need for a further approximately 24,000 sq.m of retail floorspace in Devonport at 2036 to effectively serve the needs of residents and visitors. This includes the current retail floorspace demand as well as demand which will be generated in the period to 2036, assuming no retail facilities are developed over the forecast period.
- 21 There is considered to be an opportunity for a new full-line supermarket, additional food & beverage outlets, some non-food/convenience retail shops and more large format retail stores to serve the needs of the local community and visitors.

National Retailer Gap Analysis

- 22 An analysis of key national retailers, their presence or otherwise in Devonport, and their presence or otherwise in regional cities of a similar scale to Devonport has been completed, resulting in a broad guide of the types of retailers that could potentially be supported in Devonport.

Strategic Direction for Devonport Retailing

- 23 Devonport is an important regional centre serving a large rural and semi-rural hinterland, with the retail sector performing an important role in ensuring that Devonport acts as the retail and business hub serving north-western Tasmania.
- 24 Retailing provides vital economic activity which contributes to jobs and incomes, and has an important social role in the delivery of goods and services. It also contributes to the built environment and can provide an important sense of place for the community.
- 25 Key recommendations to assist Council in guiding retail development in Devonport include:
 - Continue to support the primacy of the Devonport CBD.
 - Better define a retail centre hierarchy for Devonport.
 - Support appropriate retail development.
 - Promote development which consolidates activity in established centres and reduces fragmentation.
 - Support the ongoing operation and evolution of all activity centres in Devonport.
 - Assess major retail development applications against appropriate criteria, including for developments outside established centres.

1 Retail Study Context

Background

Devonport is a regional city located on the northern coast of Tasmania. The Devonport municipality had a residential population of approximately 26,000 in 2021. Being the third largest urban centre in Tasmania, Devonport serves a relatively broad region that includes surrounding towns such as Port Sorell, Penguin and Sheffield. The city provides a broad range of retail, commercial, community, entertainment and leisure facilities, and acts as the business hub for north-west Tasmania.

A comprehensive Retail Study was undertaken for Council in 2008, which explored the importance of retailing as an economic activity in Devonport and investigated where future retail facilities should be provided. The 2008 Retail Study provided a number of strategic directions for retailing in Devonport and was well received by Council at the time. It was completed by Essential Economics (now trading as Ethos Urban).

Since 2008 Devonport has experienced strong population growth, which has driven new commercial and retail development in the area. In particular, in 2013 Devonport City Council unveiled LIVING CITY, which is the largest urban renewal project in regional Tasmania. LIVING CITY is transforming Devonport through the creation of new retail, business and waterfront precincts, with a focus on tourism, arts, food and services.

Ethos Urban has been commissioned to undertake a new Retail Study to assist Devonport City Council in gaining an understanding of the current retail landscape of Devonport, and to identify the most appropriate future retail development opportunities to serve the needs of the growing community.

Need for Updated Retail Study

There are numerous reasons why it is important for the City of Devonport to have an up-to-date Retail Study, some of which are as follows:

- Retailing is a major industry in the Devonport economy which employs a large number of people directly and also creates employment in a wide range of supporting industries.
- Retail meets the needs of the community in relation to the provision of the goods and services essential to the function of a modern society, from basic supplies such as bread and milk, through to more discretionary needs such as fashion and electronic equipment.
- Retail plays an important role in influencing the way people use cities and towns. A high quality and well-functioning built environment – including retail shops – contributes significantly to quality of life, community pride and a range of other benefits to the community and business sectors.
- Retail facilities are used extensively by tourists and other visitors, and perceptions of Devonport are to a large degree affected by the relative attractiveness and vibrancy of its shopping facilities.

A current Retail Study will assist Council in guiding and encouraging appropriate retail development throughout Devonport to ensure the retail sector can meet the needs of local residents as well as visitors to the area.

Objectives

The key objective of this updated Retail Study is to examine the current retail landscape of Devonport and assess how effectively the existing facilities are meeting the needs of customers. It needs to examine the latest retail industry trends and build on the previous study to provide new insights and recommendations based on the latest data and market trends.

Approach

The approach taken to meet the study objectives consists of the following key tasks:

- Review the previous 2008 Retail Strategy and all other relevant literature.
- Update of the key economic data for the Devonport municipality.
- Outline the key trends in the retail sector.
- Undertake an audit of all existing retail facilities in Devonport and investigate all proposed retail developments.
- Undertake high-level consultation with key stakeholders as identified by Council.
- Define a Retail Catchment as an appropriate area for analysing key metrics.
- Analyse the current and forecast population levels, the socio-demographic profile and spending trends in the Retail Catchment.
- Prepare retail economic analysis for the Retail Catchment including analysis of retail floorspace demand compared with current retail provision, escape spending, and future retail development potential.
- Undertake a retail gap analysis to identify retailers that typically have a presence in other similar sized regional cities but are not located in Devonport.
- Provide a number of strategic directions to assist Council in guiding future retail development in Devonport.

Report Structure

This report contains the following chapters:

- Chapter 1: Retail Study Context
- Chapter 2: Economic and Policy Overview
- Chapter 3: Retail Catchment Analysis
- Chapter 4: Consultation
- Chapter 5: Hierarchy of Retail Centres
- Chapter 6: Retail Turnover and Demand Analysis
- Chapter 7: National Retailer Gap Analysis
- Chapter 8: Strategic Direction for Devonport Retailing
- Chapter 9: Conclusion
- Appendix

2 Economic and Policy Overview

This Chapter provides an overview of key economic data as well as discusses the planning scheme and other relevant policies.

2.1 Regional Economic Overview

In this Chapter the 'Devonport Region' is defined as the combination of the municipalities of Devonport, Kentish, Central Coast and Latrobe. This region corresponds to the Devonport Retail Catchment as discussed later in this study and as shown in Figure 3.1.

Gross Regional Product (GRP) is a useful indicator to measure the value of economic activity in an area. In 2021, the total amount of GRP generated in the City of Devonport is estimated at \$1.79 billion. This represents over half of the GRP generated across the Devonport Region (\$3.54 billion), as shown in Table 2.1. Overall, the Devonport Region contributed 10.2% of Tasmania's Gross State Product (GSP) in 2021.

The agriculture, forestry and fishing (14.4%), health care and social assistance (11.9%) and construction (9.3%) industries were the main contributors to the Devonport Region's Gross Regional Product in 2021. These were followed by the manufacturing (7.9%) and transport, postal and warehousing (5.4%) industries. Tables 2.1 and 2.2 show a summary of the share of economic activity generated for each municipality in the Devonport Region relative to the Tasmanian GSP figure.

Table 2.1: Gross Regional Product, Devonport Region and Tasmania, 2020/21

GRP current prices (\$m)	Devonport	Kentish	Central Coast	Latrobe	Devonport Region	Tasmania
Agriculture, Forestry and Fishing	120	80	160	150	510	3,470
Mining	10	10	0	20	40	1,410
Manufacturing	120	30	60	70	280	1,890
Electricity, Gas, Water and Waste Services	70	10	20	0	100	990
Construction	180	20	90	40	330	2,310
Wholesale Trade	60	0	30	20	110	950
Retail Trade	100	10	40	20	170	1,590
Accommodation and Food Services	30	10	20	10	70	720
Transport, Postal and Warehousing	130	10	20	30	190	1,390
Information Media and Telecommunications	40	0	10	0	50	1,080
Financial and Insurance Services	70	0	10	0	80	1,660
Rental, Hiring and Real Estate Services	30	0	10	10	50	540
Professional, Scientific and Technical Services	40	0	20	10	70	1,070
Administrative and Support Services	30	0	10	10	50	570
Public Administration and Safety	70	0	30	20	120	2,270
Education and Training	90	10	40	30	170	2,020
Health Care and Social Assistance	180	10	120	110	420	4,530
Arts and Recreation Services	10	0	10	0	20	320
Other Services	40	0	20	10	70	540
Gross Regional Product	1,790	230	870	650	3,540	34,850

Source: Ethos Urban; ABS Australian National Accounts

Table 2.2: Gross Regional Product, Devonport Region (%)

GRP current prices (\$m)	Devonport	Kentish	Central Coast	Latrobe	Devonport Region	Tasmania
Agriculture, Forestry and Fishing	6.7%	34.8%	18.4%	23.1%	14.4%	10.0%
Mining	0.6%	4.3%	0.0%	3.1%	1.1%	4.0%
Manufacturing	6.7%	13.0%	6.9%	10.8%	7.9%	5.4%
Electricity, Gas, Water and Waste Services	3.9%	4.3%	2.3%	0.0%	2.8%	2.8%
Construction	10.1%	8.7%	10.3%	6.2%	9.3%	6.6%
Wholesale Trade	3.4%	0.0%	3.4%	3.1%	3.1%	2.7%
Retail Trade	5.6%	4.3%	4.6%	3.1%	4.8%	4.6%
Accommodation and Food Services	1.7%	4.3%	2.3%	1.5%	2.0%	2.1%
Transport, Postal and Warehousing	7.3%	4.3%	2.3%	4.6%	5.4%	4.0%
Information Media and Telecommunications	2.2%	0.0%	1.1%	0.0%	1.4%	3.1%
Financial and Insurance Services	3.9%	0.0%	1.1%	0.0%	2.3%	4.8%
Rental, Hiring and Real Estate Services	1.7%	0.0%	1.1%	1.5%	1.4%	1.5%
Professional, Scientific and Technical Services	2.2%	0.0%	2.3%	1.5%	2.0%	3.1%
Administrative and Support Services	1.7%	0.0%	1.1%	1.5%	1.4%	1.6%
Public Administration and Safety	3.9%	0.0%	3.4%	3.1%	3.4%	6.5%
Education and Training	5.0%	4.3%	4.6%	4.6%	4.8%	5.8%
Health Care and Social Assistance	10.1%	4.3%	13.8%	16.9%	11.9%	13.0%
Arts and Recreation Services	0.6%	0.0%	1.1%	0.0%	0.6%	0.9%
Other Services	2.2%	0.0%	2.3%	1.5%	2.0%	1.5%
Gross Regional Product	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Source: Ethos Urban; ABS Australian National Accounts

2.2 Labour Market Overview

This section assesses key labour market indicators such as labour force, unemployment and industry of employment. For these indicators, the City of Devonport is benchmarked against other municipalities in the Devonport Region and State-wide averages.

Labour Force

The labour force is defined to include residents aged 15 to 64 years who are in paid employment (employed persons), and those actively seeking work (unemployed persons). Labour force data for the Devonport Region LGAs have been collected from the National Skills Commission which produces quarterly Small Area Labour Markets (SALM) estimates.

Over the last 10 years, the Devonport Region labour force expanded from 29,340 persons in 2011 to 30,430 persons in 2021, representing total growth of +1,090 persons at a rate of +0.4% per annum, as shown in Table 2.3. The Latrobe municipality has been a key driver of employment growth in this region since 2011, contributing 78.9% of the total growth in the region, growing at +1.7% per annum.

In contrast, the City of Devonport's labour force grew by an estimated +20 persons between 2011 and 2021, after declines between 2016 and 2021. Kentish and Central Coast also experienced declines throughout the same period, although also remain higher than 2011 levels.

Table 2.3: Total Labour Force, 2011 to 2021

Year ending Dec	2011	2016	2020	2021	Change (2011 to 2021)	Annual Average Growth (%)
Devonport	11,490	11,830	11,360	11,510	+20	+0.0%
Latrobe	4,810	5,460	5,600	5,670	+860	+1.7%
Kentish	2,820	3,000	2,860	2,900	+80	+0.3%
Central Coast	10,220	10,700	10,220	10,350	+130	+0.1%
Devonport Region	29,340	30,990	30,040	30,430	+1,090	+0.4%
Tasmania	257,300	258,420	275,600	273,960	+16,660	+0.6%

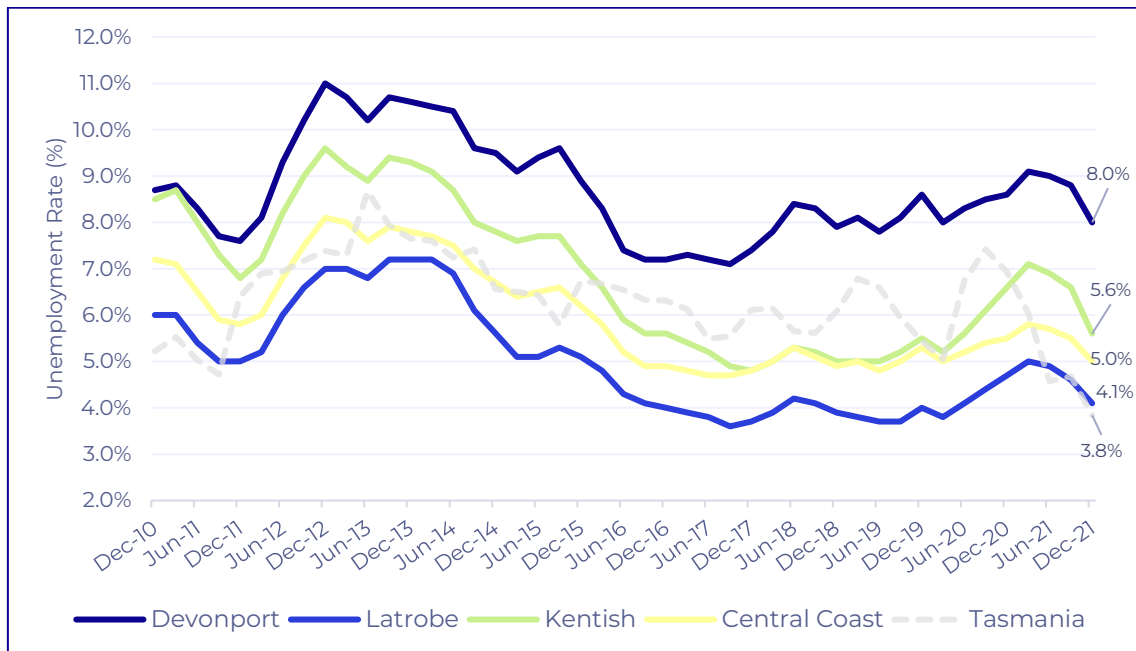
Source: SALM; ABS Labour Force; Ethos Urban

Unemployment Rate

The unemployment rate in the City of Devonport has declined from a peak of 11.0% in December 2012 to 8.0% in December 2021; however, it remains higher than the remaining Devonport Region municipalities and Tasmania.

Figure 2.1 displays how the Devonport Region municipalities have continued a similar trend over the past ten years while the unemployment rate for Tasmania differs. In December 2021, Latrobe had the lowest unemployment rate after supporting the largest increases to its labour force compared to the other municipalities, while Central Coast (5.0%) and Kentish (5.6%) unemployment rates remain higher.

Figure 2.1: Unemployment Rate, 2011 to 2021



Source: SALM; ABS Labour Force; Ethos Urban

Industry of Employment – Labour Force

ABS Census data for 2016 (the latest data available with employment data from the 2021 Census to be released in October 2022) shows that the major economic sectors in which Devonport residents are employed are health care and social assistance (14.9%), retail trade (13.1%) and manufacturing (10.0%). Other sectors that provide notable employment opportunities for Devonport's residents are education and training (8.7%), construction (8.4%) and transport, postal and warehousing (7.4%). These figures relate to employment by Devonport residents in any location including the surrounding municipalities.

When compared with Tasmanian averages, Devonport residents are employed in greater proportions in the manufacturing; transport, postal and warehousing; and mining industries, and are employed less in information media and telecommunications; public administration and safety; and arts and recreation services. This data is outlined in Table 2.4.

Table 2.4: Labour Force Devonport and Tasmania

Category	City of Devonport		Tasmania	
	No.	% Share	No.	% Share
<u>Primary Sector</u>				
Agriculture, Forestry and Fishing	470	5.3%	11,380	5.7%
Mining	140	1.6%	2,220	1.1%
Sub-Total	610	6.9%	13,600	6.8%
<u>Secondary Sector</u>				
Construction	740	8.4%	16,440	8.2%
Manufacturing	890	10.0%	14,860	7.4%
Sub-Total	1,630	18.4%	31,300	15.6%
<u>Tertiary Sector</u>				
<u>Producer Services</u>				
Electricity, Gas, Water and Waste Services	120	1.4%	3,510	1.7%
Financial and Insurance Services	140	1.6%	4,540	2.3%
Information Media and Telecommunications	70	0.8%	2,930	1.5%
Rental, Hiring and Real Estate Services	140	1.6%	2,680	1.3%
Transport, Postal and Warehousing	660	7.4%	9,150	4.6%
Wholesale Trade	270	3.0%	4,840	2.4%
Sub-Total	1,400	15.8%	27,650	13.8%
<u>Consumer Services</u>				
Accommodation and Food Services	740	8.4%	16,540	8.2%
Administrative and Support Services	310	3.5%	6,400	3.2%
Arts and Recreation Services	120	1.4%	4,020	2.0%
Education and Training	770	8.7%	20,100	10.0%
Health Care and Social Assistance	1,320	14.9%	30,680	15.3%
Professional, Scientific and Technical Services	350	4.0%	10,210	5.1%
Public Administration and Safety	450	5.1%	16,960	8.4%
Retail Trade	1,160	13.1%	23,600	11.7%
Sub-Total	5,220	58.9%	128,510	63.9%
Sub-Total Tertiary Sector	6,620	74.7%	156,160	77.7%
Total	8,860	100.0%	201,060	100.0%

Source: ABS; Ethos Urban

Tourism

Devonport's tourism sector plays a key role in the local and regional economy for Tasmania. Hosting the Spirit of Tasmania ferry, Devonport is a popular gateway to north-west Tasmania and beyond, including major tourism attractions such as Cradle Mountain.

Detailed tourism data for the Devonport SA2 is sourced from Tourism Research Australia and summarised in Table 2.5. In 2019, with this year being a pre-COVID business-as-usual benchmark, Devonport attracted a total of approximately 184,000 domestic overnight visitors and 343,430 day trips to the region. There were a further 15,280 international visitors spending a total of 319,000 nights in the area.

With international borders closed and severe lockdowns in Victoria, tourism visitation in Devonport took a significant hit in 2020 and 2021, although it is expected tourism will see a return to pre-COVID levels with the continued lessening of COVID restrictions.

Table 2.5: Visitors to Devonport SA2, 2016 to 2021 (year ending December)

Devonport SA2	2016	2017	2018	2019	2020	2021
<i>Domestic</i>						
Daytrips	410,210	337,400	351,220	343,430	306,470	306,910
Overnight	206,050	163,670	181,880	184,000	85,220	100,780
Total Domestic Visitors	616,260	501,070	533,100	527,430	391,690	407,690
Domestic Visitor Nights	676,260	565,190	385,950	507,880	209,870	286,810
<i>International</i>						
International Visitors	14,700	11,290	15,720	15,280	3,560	-
International Visitor Nights	151,310	199,030	232,310	319,010	29,730	-

Note: data for 2020 and 2021 were impacted by travel restrictions due to the COVID-19 pandemic.

Source: Tourism Research Australia; Ethos Urban

2.3 Property Trends

Residential property price and sales trends have been analysed for the City of Devonport using data from Pricerfinder.

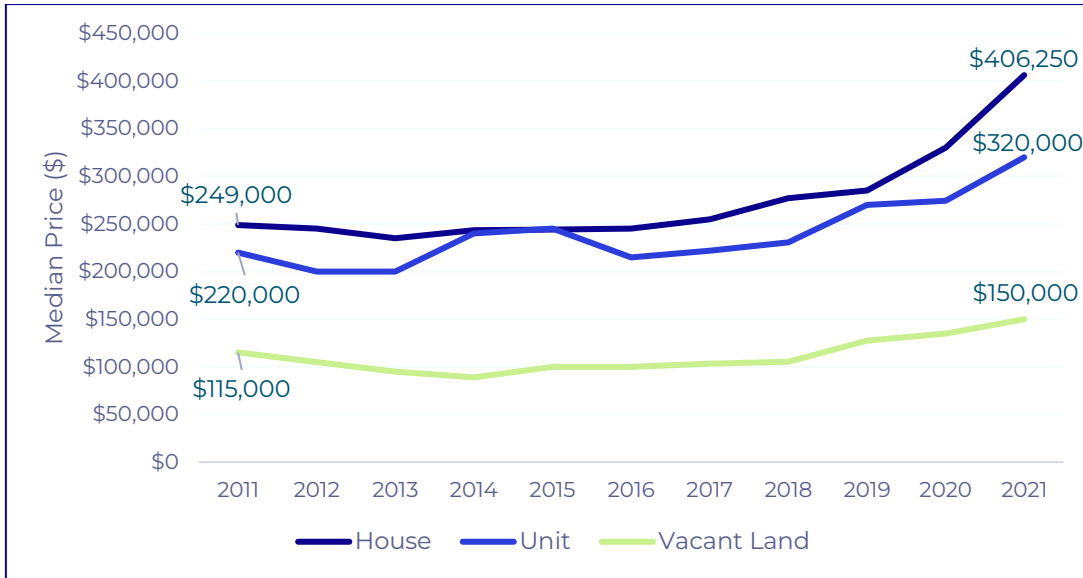
Median house prices experienced relatively flat growth between the years 2011 and 2019, growing at an average annual rate of 1.7% from \$249,000 to \$285,000 (refer Figure 2.2). Since 2019, the City of Devonport has experienced renewed interest and growth in the residential market, growing at an annual average rate of 19.4% to \$406,250 in 2021. Consistent with median house prices, the City of Devonport has experienced a strong uplift in the number of house sales, with sales in 2020 and 2021, averaging 100 more sales than the historic average over the last ten years (refer Figure 2.3).

Similarly, median prices for units and vacant land have followed comparable patterns to median house prices, albeit to a lesser extent. In 2021, the median unit price in the City of Devonport was \$320,000 having increased from \$220,000, while sales have averaged 100 units per annum over the last 10 years.

Growth in vacant land has been more subdued relative to housing and units. Historic vacant land growth has averaged 2.7% between 2011 and 2021, although since 2019 has accelerated to 8.5% per annum reaching a current median price of \$150,000.

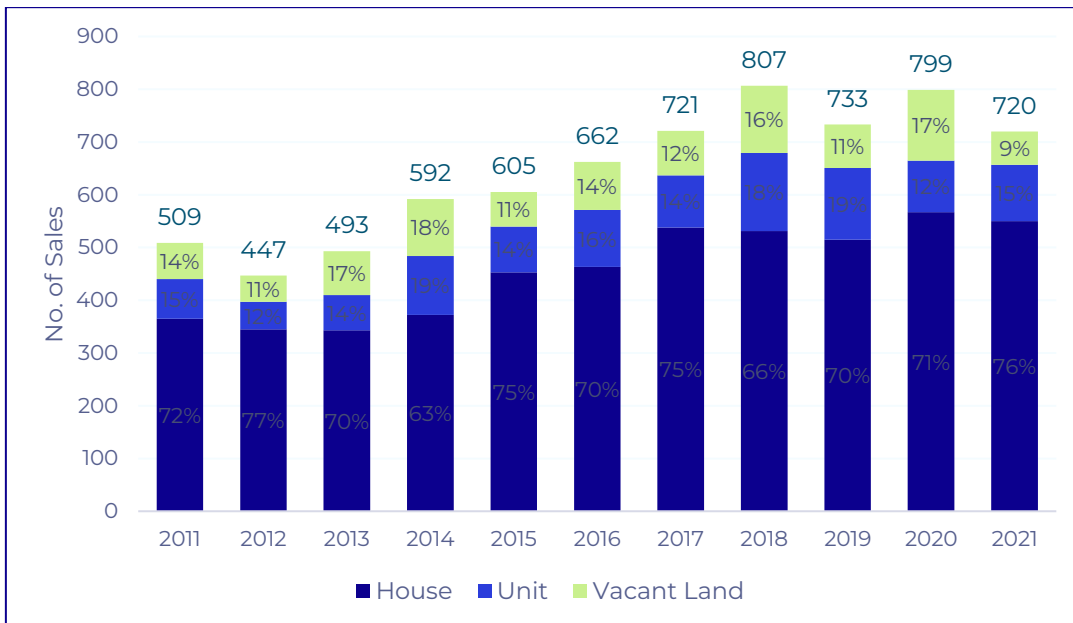
The demand for housing in Devonport has resulted in a significant shortage of rental stock. Residential vacancy rates in the postcode of 7310 have averaged around 0.2% since August 2020 and was 0.2% in April 2022 (refer Figure 2.4). The Postcode of 7310 covers a range of suburbs including Devonport, East Devonport, Aberdeen, Forth, Spreyton, Wilmot and Moina.

Figure 2.2: Median Property Prices, City of Devonport (year ending December)



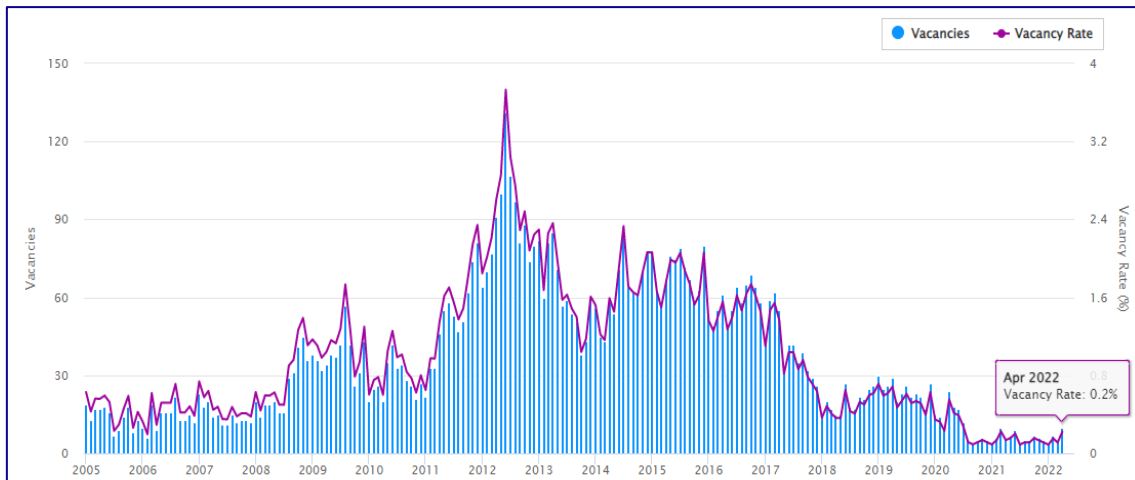
Source: Pricefinder; Ethos Urban

Figure 2.3: Number of Property Sales, City of Devonport (year ending December)



Source: Pricefinder; Ethos Urban

Figure 2.4: Residential Vacancy Rates, Suburb of Devonport



Source: SQM Research; Ethos Urban

2.4 Retail Sector Trends

Current macro trends influencing the land use composition and viability of retail facilities are summarised as follows.

Demographic Shifts

Demographic changes remain a factor that influences the shopping behaviour of Australian consumers and the function of retail shops and activity centres. In particular:

- **An aging population** is driving demand for certain uses (i.e. health and medical).
- **Millennials (or Generation Y – people born between 1982 and 1994)** are a key target for incumbent retail brands and new innovative formats, and a driver of online and digital retailing trends.
- **Increased labour force participation** is driving increased demand for convenience shopping, extended shopping hours, and accessible mixed-use centres.
- **Reduced household size (persons per household)** is resulting in centres having a dual role as a place for social interaction and for the purchase of goods and services.
- **Historically high levels of household debt** have increased sensitivity to interest rate movements with implications for discretionary spending levels.
- **An increasingly diverse ethnic base** is contributing to a wider diversity of consumer tastes.

A Challenging Retail Environment

Prior to COVID-19, rapid growth in online shopping channels (for example Amazon) combined with limited growth in discretionary spending was eroding the performance of traditional bricks and mortar retail, particularly for non-food outlets. As a result, a range of established global and national retailer brands collapsed, entered receivership/administration or significantly reduce in size, including:

- Seafolly – entered voluntary administration in June 2020
- Jeans West – entered voluntary administration

- Bose – announced they would shut all retail stores in Australia and focus on sales online
- EB Games – closed 19 stores in January 2020
- Bardot – entered voluntary administration in November 2019
- Harris Scarfe – entered receivership in December 2019
- Ed Harry – entered voluntary administration in January 2019

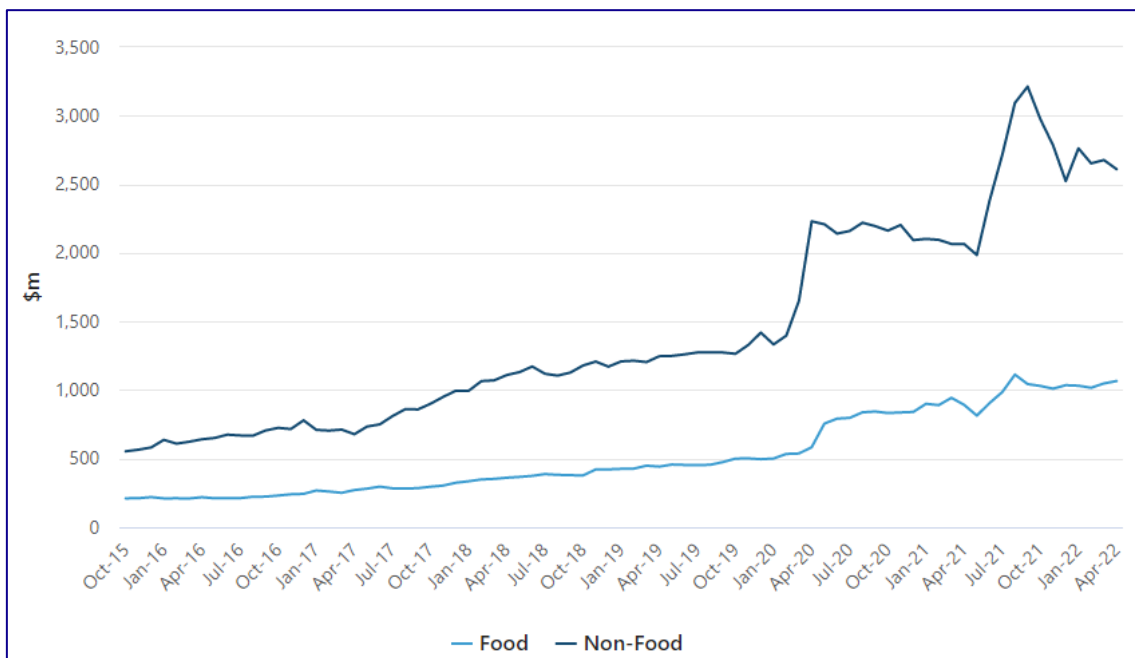
This has led to changes in the retail sector including the need to re-evaluate leasing strategies, and a re-mixing of some activity centres away from their traditional strengths. For example, the share of apparel stores has declined in many centres due to competition from online retailers.

COVID-19 Accelerates Use of Online Platforms

Pre COVID-19, the increasing use of online platforms meant many retailers were investing heavily in their online presence and transitioning their businesses to an 'omni channel' offering, with online platforms and bricks and mortar stores operated in a complementary manner. A common example of this is the so-called 'click and collect' capabilities now implemented by many retailers including major supermarkets.

COVID-19 supercharged the take-up of online retailing. Due to working from home and social distancing, people had a direct incentive to increase online spending. As a result, the share of online retail turnover (seasonally adjusted) in Australia reached a high of 15.3% in September 2021, before dropping to 10.0% as at April 2022. This is still substantially higher than the pre COVID-19 level of 6.3% as at January 2020. Figure 2.5 details the total online food and non-food retail sales as measured by the ABS.

Figure 2.5: Food and Non-Food Online Sales (Seasonally Adjusted)



Source: ABS Retail Trade (April 2022 release)

The rapid change in consumer behaviour generated by COVID-19 has also delivered flow-on effects including:

- **‘Omni channel’ retailing now expected.** Consumers are expecting that their favourite brands provide omni channel options and are prepared to move away from those that do not.
- **Retailers and Activity Centres are focusing on the ‘experience’.** The convenience afforded by online platforms means that activity centres cannot rely on drawing patronage on a purely transactional basis. Now, the success of activity centres is increasingly tied to the ability to deliver a positive customer experience relating to:
 - **Store experience** – the quality of the store fit-out, customer amenity and standard of service; and
 - **Place experience** – the attractiveness of the overall centre environment. Key trends include:
 - a **The emergence of blended use development** whereby different uses (retail, commercial office, health/medical, gyms etc) are supported in the same building
 - b **Establishment of complementary non-retail uses** such as medical centres, gyms, and co-working space for multi-function activity centres
 - c **Supporting entertainment uses in larger centres** to drive after-hours activity such as bars, restaurants, cinemas, bowling alleys etc.
 - d **Renewed focus on the importance of marketing** and particularly ‘place branding’ initiatives that promote the point of difference of a place or centre to attract new customers.

2.5 Devonport Strategic Plan 2009-2030

The Devonport Strategic Plan 2009-2030 was developed in conjunction with Council, the community, and key stakeholders, and outlines how Council plans to achieve its vision for Devonport, with this vision being to become *“a thriving and welcoming regional City living lightly by river and sea”*.

Goal 2 under the plan recognises the goal to build a unique city, including to facilitate appropriate property use and development, and to promote the development of the CBD in line with the principles of the LIVING CITY Principles Plan.

Goal 3 in the plan intends to grow a vibrant economy for Devonport, including recognising Devonport as the business, service, and retail centre for north-west Tasmania.

2.6 Devonport LIVING CITY Masterplan

Devonport’s LIVING CITY is the largest urban renewal project undertaken in regional Tasmania and is transforming Devonport by creating a cultural heart, opening the city up to the waterfront, and further establishing the city as a key destination for business activity and visitors.

The LIVING CITY Masterplan was developed in 2014 to support this vision. The Masterplan recognises a number of precincts in the CBD, including a new retail precinct, civic precinct, waterfront, Rooke Street Mall, and business and professional precinct.

Northern areas of the CBD, being the new retail precinct, civic precinct and waterfront, are seeing the greatest change from LIVING CITY, with ongoing development occurring in this area. This includes the new multi-purpose civic building, the Paranple Centre, which hosts a library,

customer service centre, council offices, and a conference centre, as well as construction of the waterfront precinct.

At completion, the LIVING CITY project will create a high-quality live-work-play environment. It will result in a connected CBD, with links to the Mersey River and across existing retail and businesses, and will enable the CBD. to capture a greater number of tourist dollars. The aim is for Devonport to become a key destination and a regional centre for north-west Tasmania.

2.7 Tasmanian Planning Scheme

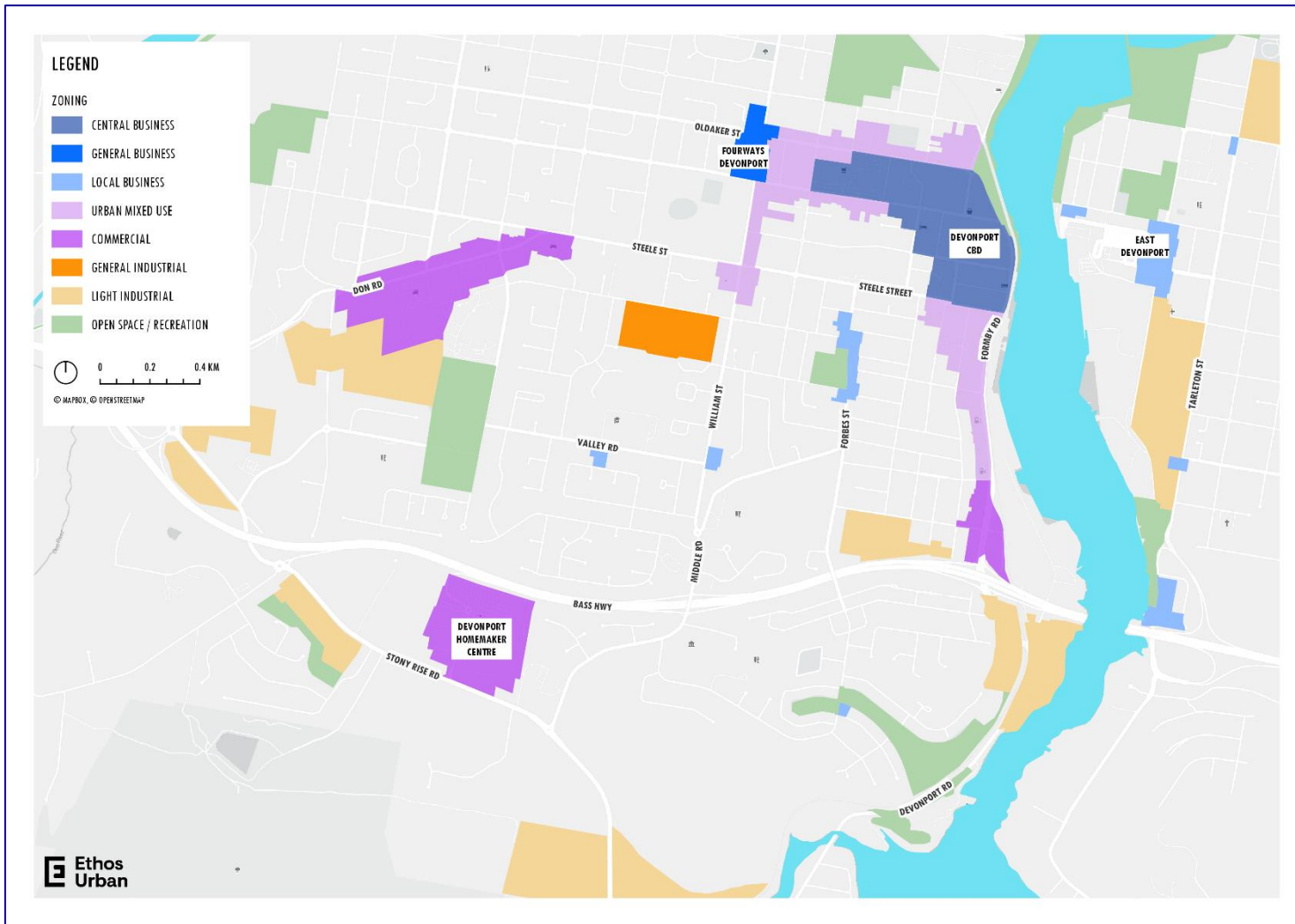
The Tasmanian Planning Scheme controls use and development of land throughout Tasmania, including in the Devonport municipality, through the application of zones, codes and various provisions. The key zones supporting the development of retail uses are as follows:

- **Central Business:** applies to primary centres throughout Tasmania, including the Devonport CBD. This zone allows for the concentration of higher order business, retail, administrative, professional, community, and entertainment functions.
- **General Business:** supports business, retail, administrative, professional, community, and entertainment functions for the main suburban and rural centres in Tasmania, including William Street (Fourways) in Devonport.
- **Local Business:** applies to centres supporting local areas, including Forbes Street in Devonport and East Devonport Village.
- **Urban Mixed Use:** provides for a mix of uses in urban locations, including residential, retail, community services, and commercial activities. In Devonport this zone applies particularly to areas to the north-west and south of the CBD.
- **Commercial:** supports retailing, service industries, storage and warehousing requiring large floor and outdoor areas, and high levels of vehicle access and parking. This zone applies to Don Road and the Homemaker Centre in Devonport.

There are also some lower order retail locations throughout Devonport's residential zones, providing very basic convenience retail to their immediate populations.

The zoning for the wider Devonport area is shown in Figure 2.6.

Figure 2.6: Devonport Land Zones



Source: Tasmanian Planning Scheme; Ethos Urban

2.8 Summary and Implications

- The Devonport Region has a diverse economy with Agriculture, Forestry & Fishing; Health Care & Social Assistance; and Construction being some of its key industries.
- Devonport's tourism sector plays a key role in the local economy which benefits from the presence of the Spirit of Tasmania terminal.
- The retail sector is constantly evolving reflecting an ongoing shift in demographics, changing consumer preferences, the growth of online and the impacts from the COVID-19 pandemic.
- Devonport's LIVING CITY is the largest urban renewal project undertaken in regional Tasmania. It is transforming Devonport by creating a cultural heart and opening the city up to the waterfront.
- The key zones in the Tasmanian Planning Scheme supporting the development of retail uses include Central Business, General Business, Local Business, Urban Mixed Use and Commercial.

3 Retail Catchment Analysis

This Chapter provides analysis of the catchment most relevant for retailing in the City of Devonport.

3.1 Retail Catchment Definition

It is important to recognise that the retail sector in Devonport operates in a regional context and that retailers in Devonport serve both local residents and those coming to shop in Devonport from further afield, including tourists and other visitors.

Having regard for the relatively small geographic size of the City of Devonport and its position as a key service centre for a substantial hinterland, it is critical that the shopping needs and patterns of these residents outside the municipality are also considered when determining retail need in Devonport.

Utilising mobile ping data from Near (see Appendix for more detail), the home location of people visiting the Devonport CBD has been identified. Near data, which tracks the location of mobile phones via apps, provides a representative sample of people visiting a certain locality. In this case, the data has been used to define a Retail Catchment for Devonport, based on the home location of patrons of the Devonport CBD and the level of visitation.

The data reveals that some 82% of visits to the Devonport CBD are from people residing in the municipalities of Devonport, Latrobe, Kentish and Central Coast. The combination of these areas is referred to as the **Devonport Retail Catchment** in this study. This analysis supports the previously identified Devonport Retail Catchment in the 2008 Retail Strategy.

The extent of the Devonport Retail Catchment is shown in Figure 3.1.

The retail sector in Devonport also has a role to play in serving tourists and other visitors to the area, in particular those utilising the Spirit of Tasmania ferry service. In this respect, many retailers in Devonport attract retail spending from visitors from across Tasmania and Australia, as well as a smaller share from international tourists (which was significantly impacted due to the COVID-19 pandemic).

It is important to appreciate that residents of the City of Devonport may spend a proportion of their retail expenditure outside the municipality; for example, in association with purchases made while at work, on holiday etc. In this regard, we note that while many employees travel to Devonport for work, a proportion of the local residents also travel outside the region for employment purposes, such as to Launceston and Burnie.

Figure 3.1: Devonport Retail Catchment



Source: Ethos Urban

3.2 Population Trends and Forecasts

The ABS 2021 Census was released in late June 2022. The data indicates that population growth in the area was higher than previously anticipated. Based on the new Census data, in mid-2021 the population of Devonport Retail Catchment is estimated at 69,690 persons including 26,920 residents in the City of Devonport.

Historic population growth has been strong in the Latrobe municipality over the years from 2016 to 2021, averaging +360 persons per annum. Development in the coastal town of Port Sorrell is driving some of this growth, which currently includes two significant residential developments – Calm Cove and Hawley Beach Estate.

After experiencing population declines between 2011 and 2016, population growth in the other municipalities rebounded with solid growth from 2016 to 2021, particularly in Devonport. This is confirmed by the number of new dwelling approvals in the area, as sourced from the ABS. Over recent years, from 2018 to 2021, the Devonport Retail Catchment has averaged approximately 410 new dwelling approvals per annum (see Table 3.2). Across the 2021 financial year, the region experienced a significant spike in new dwelling approvals, up +160 from the previous year.

In our view future growth in the Devonport Retail Catchment is projected to result in the population reaching 76,900 residents by 2036 including 28,800 persons in the City of Devonport.

The *Greater Devonport Residential Growth Strategy 2021-2041* was released by Devonport City Council in June 2022. It includes an aspirational target population of 30,000 by 2030 and 35,000 by 2040. Therefore, the projected rate of growth for Devonport adopted in this report could be considered conservative when compared with the aspirations of Council. It is considered important that a study such as this generally adopts a more conservative approach to ensure that the need for additional retail floorspace in the area is not overstated.

Historic population levels for the Devonport Retail Catchment have been estimated by using ABS Estimated Resident Population (ERP) data, which is considered the most accurate and up-to-date population data available in Australia. Population estimates to 2036 have been forecast using a range of sources including ABS New Dwellings Approval data; Nearmap Aerial Imagery; Cordell Connect; and other investigations of residential development undertaken by this office. The population estimates for the Devonport Retail Catchment from 2011 to 2036 are shown in Table 3.1.

Table 3.1: Retail Catchment Population Estimates and Projections, 2011-2036 (as at June)

Category	2011	2016	2021	2026	2031	2036
Population						
Devonport	25,750	25,130	26,920	27,420	28,020	28,820
Latrobe	10,280	10,930	12,710	13,710	14,810	16,060
Kentish	6,370	6,260	6,780	6,930	7,130	7,380
Central Coast	<u>22,330</u>	<u>21,740</u>	<u>23,280</u>	<u>23,680</u>	<u>24,130</u>	<u>24,630</u>
Devonport Retail Catchment	64,730	64,060	69,690	71,740	74,090	76,890
Average Annual Growth (no.)						
Devonport		-120	+360	+100	+120	+160
Latrobe		+130	+360	+200	+220	+250
Kentish		-20	+100	+30	+40	+50
Central Coast		<u>-120</u>	<u>+310</u>	<u>+80</u>	<u>+90</u>	<u>+100</u>
Devonport Retail Catchment		-130	+1,130	+410	+470	+560
Average Annual Growth (%)						
Devonport		-0.5%	+1.4%	+0.4%	+0.4%	+0.6%
Latrobe		+1.2%	+3.1%	+1.5%	+1.6%	+1.6%
Kentish		-0.3%	+1.6%	+0.4%	+0.6%	+0.7%
Central Coast		<u>-0.5%</u>	<u>+1.4%</u>	<u>+0.3%</u>	<u>+0.4%</u>	<u>+0.4%</u>
Devonport Retail Catchment		-0.2%	+1.7%	+0.6%	+0.6%	+0.7%

Source: ABS; Nearmap; Cordell; Ethos Urban

Table 3.2: New Residential Dwelling Approvals, 2018 to 2021 (as at June)

	2018	2019	2020	2021	Average (2018 to 2021)
Devonport	114	110	138	168	133
Latrobe	129	135	127	192	146
Kentish	22	31	33	50	34
Central Coast	82	86	78	129	94
Devonport Retail Catchment	347	362	376	539	406

Source: ABS Building Approvals; Ethos Urban

3.3 Socio-Economic Characteristics

Table 3.3 compares the socio-economic profile of residents in the Devonport Retail Catchment with Tasmania, as sourced from the recently released 2021 ABS Census. The main points drawn from the data for the Devonport Retail Catchment are as follows:

- Median household income levels below the Tasmanian median.** Median household income levels across the Devonport Retail Catchment (\$63,010) are -12.6% below the Tasmanian median (\$72,070). The City of Devonport has the lowest median household income (\$61,730) out of all municipalities in the Devonport Retail Catchment, while Latrobe Council has the highest (\$65,550).
- Older age profile.** The Devonport Retail Catchment has an older age profile (46.3 years) compared with Tasmania (41.6), with a higher proportion of the population aged over 65 years. The City of Devonport median age is the most aligned (42.4 years) with the Tasmanian average, with a strong share of the population between the ages of 20 to 34 years.
- Family-orientated household composition aligned with the Tasmanian benchmark.** Family households comprise the majority of households in the Devonport Retail Catchment (68.0%), which is slightly above the Tasmanian benchmark (67.3%). Notably, the City of Devonport has an above average share of lone person households (31.9%), compared with the Devonport Retail Catchment (29.7%) and Tasmania (29.3%).
- Tenure type across the Devonport Retail Catchment considerably varies across municipalities.** Most residents in the Devonport Retail Catchment own their dwelling outright or with a mortgage (74.1%) similar to the Tasmanian benchmark (71.5%), although there are substantial differences between the regions. The City of Devonport has the highest share of renters (31.9%) compared to Kentish (12.8%), Central Coast (20.5%), and Latrobe (22.6%).

The socio-demographic profile of the Devonport Retail Catchment is representative of an established regional centre, characterised by slightly lower incomes, older age structure, who on average own outright or have a mortgage on a detached dwelling.

Table 3.3: Socio-Economic Characteristics, 2021

Category	Devonport	Latrobe	Kentish	Central Coast	Devonport Retail Catchment	Tasmania
Income						
Median individual income (annual)	\$32,790	\$33,460	\$31,640	\$33,080	\$32,910	\$37,030
Variation from Tasmania median	-11.5%	-9.6%	-14.6%	-10.7%	-11.1%	n.a.
Median household income (annual)	\$61,730	\$65,550	\$64,770	\$62,530	\$63,010	\$72,070
Variation from Tasmania median	-14.3%	-9.0%	-10.1%	-13.2%	-12.6%	n.a.
Age Structure						
0-4 years	5.2%	4.5%	4.0%	4.3%	4.6%	5.0%
5-19 years	17.5%	15.8%	16.4%	16.8%	16.9%	16.7%
20-34 years	18.6%	14.4%	14.2%	15.0%	16.2%	19.5%
35-64 years	36.2%	38.0%	43.5%	38.8%	38.1%	37.9%
65-84 years	20.0%	24.8%	20.4%	22.2%	21.6%	18.6%
85 years and over	2.6%	2.6%	1.3%	2.9%	2.6%	2.3%
Median Age (years)	42.4	48.6	48.0	47.6	46.3	41.6
Country of Birth						
Australia	89.4%	90.1%	88.0%	91.2%	90.0%	84.6%
Other Major English Speaking Countries	4.9%	6.3%	7.3%	5.5%	5.6%	6.2%
Other Overseas Born	5.7%	3.6%	4.7%	3.3%	4.4%	9.2%
% speak English only at home	94.9%	96.8%	96.6%	97.9%	96.4%	91.0%
Household Composition						
Couple family with no children	28.3%	36.6%	36.7%	33.1%	32.1%	30.1%
Couple family with children	<u>22.3%</u>	<u>24.0%</u>	<u>26.6%</u>	<u>24.0%</u>	23.6%	<u>25.1%</u>
Couple family - total	50.6%	60.5%	63.3%	57.1%	55.7%	55.2%
One parent family	<u>13.7%</u>	<u>10.0%</u>	<u>8.5%</u>	<u>11.0%</u>	11.7%	<u>11.3%</u>
Family households - total	65.2%	71.2%	71.9%	68.6%	68.0%	67.3%
Lone person household	31.9%	26.9%	25.7%	29.6%	29.7%	29.3%
Group household	3.0%	1.9%	2.4%	1.7%	2.3%	3.4%
Dwelling Structure (Occupied Private Dwellings)						
Separate house	87.6%	93.6%	96.8%	90.6%	90.5%	86.9%
Semi-detached house, townhouse etc.	11.4%	5.0%	3.0%	7.8%	8.3%	6.1%
Flat, unit or apartment	0.2%	0.6%	0.0%	0.3%	0.3%	6.4%
Average household size	2.3	2.3	2.4	2.3	2.3	2.4
Tenure Type (Occupied Private Dwellings)						
Owned outright	36.0%	44.2%	48.6%	44.3%	41.4%	37.8%
Owned with a mortgage	31.2%	31.9%	37.0%	34.0%	32.8%	33.7%
Rented	31.9%	22.6%	12.8%	20.5%	24.7%	26.8%
Housing Costs						
Median monthly mortgage repayment	\$1,213	\$1,336	\$1,269	\$1,256	\$1,251	\$1,365
Variation from Tasmania median	-11.2%	-2.1%	-7.1%	-8.0%	-8.3%	0.0%
Median weekly rents	\$250	\$266	\$225	\$249	\$252	\$301
Variation from Tasmania median	-16.9%	-11.6%	-25.1%	-17.2%	-16.4%	0.0%

Source: ABS Census of Population and Housing 2021; Ethos Urban

3.4 Retail Spending Analysis

The following provides an analysis of the expected retail spending behaviour of residents in the Retail Catchment. Estimates of retail spending by residents have been prepared with reference to the MarketInfo retail spending model. MarketInfo is a micro-simulation model which uses data from the ABS Household Expenditure Survey (HES), the ABS Census of Population and Housing, ABS Australian National Accounts, and other relevant sources.

The retail spending data is presented across four major spending categories:

- **Food, Liquor and Groceries (FLG)**, which includes fresh food, groceries and take-home liquor, including supermarket spending.
- **Food Catering**, which includes cafes, restaurants and takeaway food.
- **Non-Food**, which includes apparel, homewares and general merchandise.
- **Retail Services**, including hairdressers, beauty salons etc.

Estimates of average per capita retail spending in 2021 for Devonport Retail Catchment residents are shown in Table 3.4 and are compared with the average for Tasmania. Average per capita spending by residents in the Retail Catchment is estimated at \$13,700 a year, which is -3.3% below the Tasmanian average. Conversely, per capita spending on FLG, the key category for supermarkets, by Retail Catchment residents is +0.5% above average for Tasmania. All spending estimates in this report are expressed including GST.

Table 3.4: Average Per Capita Retail Spending, 2021

Area	Food, Liquor and Groceries	Food Catering	Non-Food	Retail Services	Total Retail
<u>Per Capita Spending (\$2021)</u>					
Devonport	\$6,200	\$1,380	\$5,480	\$440	\$13,500
Latrobe	\$6,420	\$1,460	\$5,810	\$460	\$14,150
Kentish	\$6,310	\$1,330	\$5,460	\$420	\$13,510
Central Coast	\$6,250	\$1,410	\$5,630	\$460	\$13,750
Devonport Retail Catchment	\$6,270	\$1,400	\$5,590	\$450	\$13,700
<i>Total TAS</i>	<i>\$6,240</i>	<i>\$1,530</i>	<i>\$5,920</i>	<i>\$480</i>	<i>\$14,170</i>
<u>Variation from Total TAS average</u>					
Devonport	-0.6%	-9.8%	-7.4%	-8.3%	-4.7%
Latrobe	2.9%	-4.6%	-1.9%	-4.2%	-0.1%
Kentish	1.1%	-13.1%	-7.8%	-12.5%	-4.7%
Central Coast	0.2%	-7.8%	-4.9%	-4.2%	-3.0%
Devonport Retail Catchment	0.5%	-8.5%	-5.6%	-6.3%	-3.3%

Source: MarketInfo; Ethos Urban

The total retail spending capacity of the Retail Catchment population is detailed in Table 3.5. It is calculated by multiplying the current and future population forecasts, with the per capita retail spending estimates outlined above. The spending forecasts are presented in constant \$2021, i.e., excluding the effects of price inflation, though do include an allowance for real growth in per capita spending assumed to average around 0.9% per annum.

The total retail spending capacity of the Devonport Retail Catchment population is estimated at \$939 million in 2021, including \$431 million of FLG spending. Retail spending is projected to increase strongly over the forecast period to reach \$1.18 billion at 2036, including \$544 million of FLG spending.

Table 3.5: Devonport Retail Spending Capacity, 2021 - 2036 (Constant \$2021)

Retail Category	2021	2026	2031	2036
<u>Devonport</u>				
FLG	\$163.6m	\$174.3m	\$186.2m	\$200.3m
Food Catering	\$36.4m	\$39.0m	\$41.9m	\$45.3m
Non-Food	\$143.4m	\$151.7m	\$161.0m	\$172.0m
Services	\$11.7m	\$12.5m	\$13.4m	\$14.5m
Total Retail	\$355.1m	\$377.5m	\$402.6m	\$432.2m
<u>Latrobe</u>				
FLG	\$80.7m	\$91.1m	\$102.9m	\$116.7m
Food Catering	\$18.4m	\$20.9m	\$23.7m	\$27.0m
Non-Food	\$72.6m	\$81.3m	\$91.2m	\$102.7m
Services	\$5.8m	\$6.5m	\$7.4m	\$8.5m
Total Retail	\$177.5m	\$199.8m	\$225.2m	\$254.9m
<u>Kentish</u>				
FLG	\$42.3m	\$45.3m	\$48.7m	\$52.7m
Food Catering	\$9.0m	\$9.6m	\$10.4m	\$11.3m
Non-Food	\$36.3m	\$38.6m	\$41.2m	\$44.3m
Services	\$2.8m	\$3.0m	\$3.3m	\$3.6m
Total Retail	\$90.4m	\$96.5m	\$103.6m	\$111.9m
<u>Central Coast</u>				
FLG	\$144.0m	\$153.2m	\$163.2m	\$174.3m
Food Catering	\$32.5m	\$34.8m	\$37.3m	\$40.0m
Non-Food	\$128.7m	\$135.9m	\$143.9m	\$152.5m
Services	\$10.7m	\$11.4m	\$12.2m	\$13.1m
Total Retail	\$315.9m	\$335.3m	\$356.6m	\$379.9m
<u>Devonport Retail Catchment</u>				
FLG	\$430.6m	\$463.8m	\$501.1m	\$544.0m
Food Catering	\$96.3m	\$104.3m	\$113.2m	\$123.6m
Non-Food	\$381.0m	\$407.5m	\$437.3m	\$471.6m
Services	\$30.9m	\$33.5m	\$36.3m	\$39.6m
Total Retail	\$938.9m	\$1,009.0m	\$1,087.9m	\$1,178.8m

Source: MarketInfo; Ethos Urban

3.5 Summary and Implications

- A Retail Catchment has been defined for the purposes of this study which includes the municipalities of Devonport, Latrobe, Kentish and Central Coast.
- The population of the Devonport Retail Catchment is estimated at 69,700 persons at June 2021, including 26,900 residents in the City of Devonport. Future growth in the Retail Catchment is projected to result in the population reaching 76,990 residents by 2036 including 28,800 persons in the City of Devonport.
- The projected rate of growth for the City of Devonport could be considered conservative when compared with the aspirations of Council, which has a target population of 30,000 by 2030 and 35,000 by 2040.
- Per capita retail spending by residents in the Devonport Retail Catchment is slightly below the average for Tasmania, though the Catchment is above average for spending on food, liquor and groceries (FLG).
- The retail spending capacity of this population is estimated at \$939 million in 2021, including \$431 million of FLG spending. Retail spending is projected to increase strongly over the forecast period to reach \$1.18 billion at 2036.
- The growth in retail spending by residents in the Devonport Retail Catchment will create the need for additional retail floorspace in Devonport over time.

4 Consultation

As part of this Retail Study high-level consultation with key stakeholders, as identified by the City of Devonport, was undertaken. The objective of the consultation was to explore the key strengths and any major issues of concern facing the retail sector in Devonport.

In general terms, the feedback received is summarised as follows:

- The Devonport CBD generally works effectively, providing an appropriate mix of national brands and local operators. It provides a range of asset and building types that can accommodate most business needs. A key strength is the concentration of major supermarkets in the one area, as well as the LIVING CITY project.
- There is the opportunity to improve the presentation and quality of the existing retail offer to meet the expectations of the community, particularly the existing supermarket offers. This could be improved by capital investment with a focus on design, convenience, technology and sustainability. The uniqueness and range of different businesses in Devonport could be better recognised and promoted.
- Council could do more to support the retail sector which is facing a range of challenges. A central platform for retailers and stakeholders to share information and ideas should be implemented, as well as providing better information for tourists and other visitors on the retail/hospitality offer in Devonport.
- The provision of car parking and the walkability of the CBD is generally suitable, though there is some concern of a lack of convenient on-grade carparking, particularly near the major supermarkets. The reopening of the Mall to vehicular traffic should be considered subject to community consultation.
- The substantial and growing population base of the area creates the demand for additional retail facilities, including large format retail and showrooms, with some existing stores currently overcrowded and existing centres at capacity.
- There is a current lack of appropriate zoned land to accommodate additional retail stores, particularly outside of the CBD. In particular, the lack of neighbourhood centres to serve the suburbs of Devonport was raised as a concern.
- There is a need for further space to accommodate more large format retail and showroom uses. The CBD does not have sufficient or appropriate sites to accommodate these types of uses.
- The shift away from large format apparel is highlighted, with concern shown for the transition of these large format sites to differing uses, such as bulky goods, particularly given a lack of vehicle access.

In summary, the feedback received reflects that the Devonport CBD is generally an effective hub for retail activity, though the built form, quality of some shops, level of on-grade carparking and promotion activity could be improved. In the future, stakeholders discussed the need for additional retail facilities to serve the growing community, particularly additional large format retail uses and neighbourhood centres outside of the CBD.

5 Hierarchy of Retail Centres

This Chapter describes the current and likely future retail landscape of Devonport. Each retail centre in the municipality is detailed, while key centres located in the broader region are also outlined.

The location of major retailers in Devonport and the most relevant zones to retail are shown in Figure 5.1.

5.1 Existing Centres Overview

The Tasmanian Planning Scheme provides land use zones across the Devonport municipality. In terms of the zones which have an influence on the retail centre hierarchy in Devonport, the following provides a high-level overview:

- Central Business: This zone applies to primary centres and covers the Devonport CBD.
- General Business: This zone applies to main suburban and rural centres and covers Fourways.
- Local Business: This zone applies to centres supporting local areas, which covers numerous retail centres throughout Devonport.
- Urban Mixed Use: This zone provides for a mix of uses in urban locations including residential, retail, community and commercial use. Land surrounding the Devonport CBD and along William Street to the south of Fourways is located in this zone.
- Commercial: This zone provides for retailing, service industries, storage and warehousing requiring large floor areas. Land along Don Road, along Formby Road immediately north of the Bass Highway, and the Devonport Homemaker Centre is located in this zone.

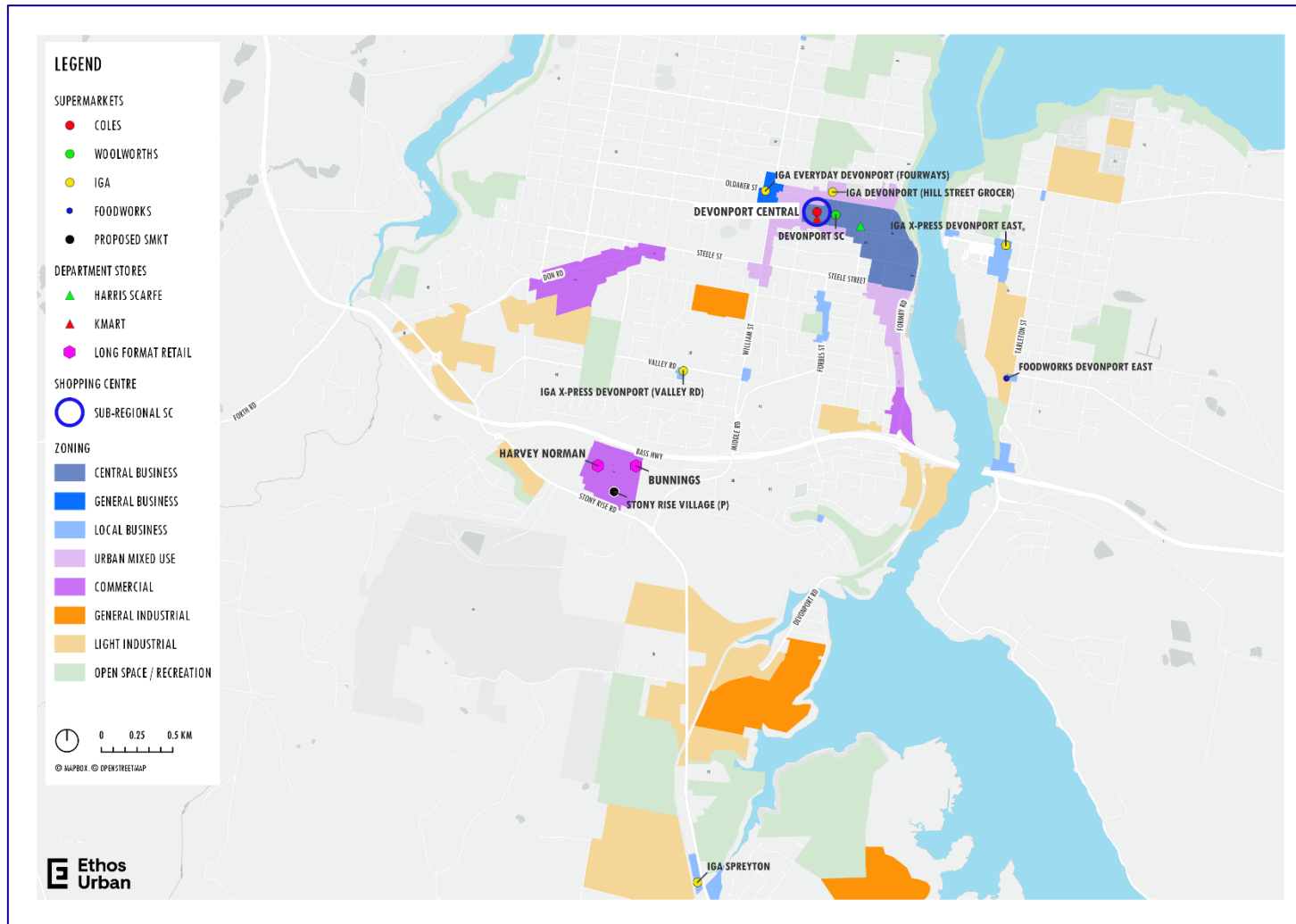
Devonport CBD

The Devonport CBD is the main business hub serving the wider surrounding region and provides a broad range of retail, commercial, entertainment, administrative and community uses. As discussed previously, it serves patrons throughout the defined Devonport Retail Catchment, which includes the municipalities of Devonport, Latrobe, Kentish and Central Coast. It also attracts some patronage from localities further afield such as Burnie and even Launceston, as well as serves tourists.

The CBD is generally located centrally to the urban area of Devonport, though is separated from East Devonport by the Mersey River. Formby Road provides convenient access to the CBD from the Bass Highway to the south, though it can become congested particularly during peak periods.

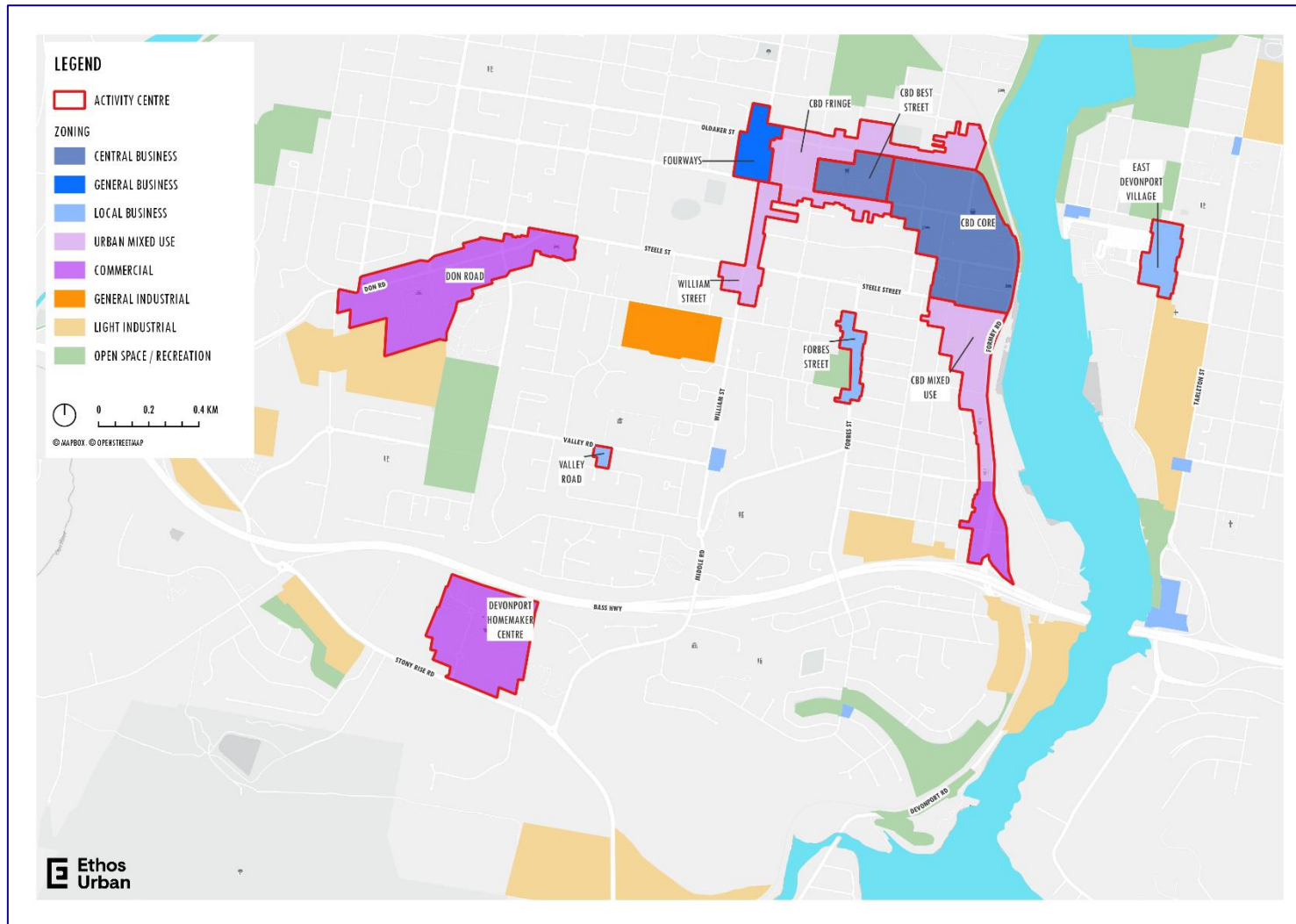
The Central Business zone generally extends from Steele Street in the south to Oldaker Street in the north, and from the Mersey River in the east to as far west as Gunn Street. For the purposes of this study, the area within the Central Business zone has been divided into CBD Core and CBD Best Street, to the east and west of Griffiths Street respectively. The land within the Urban Mixed Use Zone immediately north of the CBD Core (north of Oldaker Street) is referred to as the CBD Fringe, while the land south of the CBD within the Urban Mixed Use and Commercial zones is referred to as CBD Mixed Use. These areas are illustrated on Figure 5.2.

Figure 5.1: Major Retail Outlets and Relevant Zones



Source: Tasmanian Planning Scheme; Ethos Urban

Figure 5.2: Defined Retail Precincts and Relevant Zones



Source: Tasmanian Planning Scheme; Ethos Urban

CBD Core

The CBD Core provides a diverse range of retail shops and services, as well as a wide mix of non-retail shops, commercial office space, community uses and entertainment facilities.

Rooke Street Mall is the focus for retail activity in the CBD, and includes many national retailers typically present in regional cities throughout Australia (refer Chapter 7 for further detail). The Mall (and Rooke Street to the south) contains a range of apparel outlets including large Cotton On, Best & Less and Rivers outlets. The central spine also offers a diverse range of food options as well as a mix of non-food stores, convenience retail shops and services.

Traditional street-based retailing is also provided along the other streets in the area, particularly Stewart Street which includes a range of leisure (such as Toyworld and SportsPower), apparel and homewares stores. The former Target outlet at the intersection of Stewart Street and Rooke Street is now a large pharmacy. In terms of entertainment uses, the key anchor is a Reading Cinemas complex at the eastern end of Best Street.

The amount of commercial office space is also increasing in the CBD, which provides additional workers benefiting the retailers and other businesses in the area.

As detailed later in this Chapter, the CBD Core had a vacancy rate of 7.2% of retail floorspace as at April 2022 based on a field visit to Devonport at this time. This is slightly above the range of 4% to 6% which typically indicates a healthy centre. While some of the vacancies are located on Rooke Street Mall, the majority are situated on the secondary Stewart Street. Given the vacancies are mostly located in less prominent tenancies, this level of vacancy is not considered of concern for the CBD, which overall provides a vibrant and diverse retail offering.

The primary redevelopment areas of LIVING CITY are situated in the northern part of the CBD and are being progressively developed. The Paranaple Centre is complete and houses the Devonport Council offices, Devonport Library, customer service centre, a conference centre and a small Hudsons Coffee outlet. Some retail/entertainment facilities are provided in Market Square Pavilion, which includes Southern Wild Distillery, Firestorm Tacos & Bar as well as an events space. Additional retail uses are planned in the next stages of LIVING CITY.

CBD Best Street

This part of the CBD includes the major retail anchors of Kmart, Woolworths and Coles. These retailers, particularly the two major supermarkets, are understood to be trading strongly and appear to have 'outgrown' their current tenancies. The supermarkets could be better presented to effectively meet the expectations of consumers.

The supermarkets, and particularly the car parks, become congested during peak periods. This reflects that the supermarkets are the only major supermarkets located within Devonport. A range of food and beverage outlets and convenience retail shops are located within the Woolworths supermarket building.

CBD Fringe

The CBD Fringe precinct is defined as the area north of Oldaker Street, which has transformed significantly since 2008. The Hill Street Grocer (which replaced the former Home Timber and Hardware store) generally provides a high-quality offer of fresh produce, grocery products, homewares and a café. A liquor store, bar, medical centre, pharmacy and real estate agent are also located in the centre. A range of large format retail outlets are also located on the northern and southern sides of Oldaker Street.

CBD Mixed Use

A variety of commercial and retail uses are provided within the CBD Mixed Use precinct. The retail offer is a scattering of outlets, mostly located on Formby Road. The types of retail stores range from

large format retail outlets (Godfreys, Choices Flooring, Carpet Court and Petbarn), food stores (No Frills Foodmarket) to some homeware/gift shops. A large Allgoods outdoor/camping outlet is located near the Bass Highway. Formby Road is a key north-south traffic route into the CBD from the south, and while it provides exposure to the retailers, access from the road is somewhat difficult given the amount of traffic.

Other Retail Centres

Fourways

The Fourways precinct extends along William Street, generally from around Oldaker Street to Best Street. It offers a village centre atmosphere with a wide collection of stores including a mix of national brands and independent operators. A number of arcades and pedestrian walkways provide convenient connectivity from William Street to a car park on Kempling Street. IGA X-press and The Reject Shop are located in the northern part of the centre. There are some tenancies of lower quality, though overall the centre functions well as a convenience shopping precinct for local residents.

East Devonport

East Devonport is separated from the balance of Devonport by the Mersey River, though can be easily accessed via the Bass Highway. A large port, including a terminal for the Spirit of Tasmania ferry, as well as a range of industrial uses, is located in East Devonport.

The retail offer is concentrated in East Devonport Village, while a scattering of retail uses are also provided along Tarleton Street to the south. The retail facilities in East Devonport serve both local residents as well as visitors using the Spirit of Tasmania.

East Devonport Village is centred around Wright Street and provides a relatively wide range of convenience retail outlets including an IGA X-press supermarket at the northern end near Thomas Street, some convenience retail shops on Wright Street and a range of cafes and services provided on Murray Street.

The various parts of the centre are not well integrated, with its walkability impacted by the presence of various large vacant blocks and some residential homes. The current layout of the centre in effect separates the retailers at the northern end near Thomas Street with the shops located on Murray Street. This impacts on the overall vibrancy of the centre. A field visit of the area revealed a vacancy rate of 17.5%, which is somewhat concerning. The vacancies are generally located in the northern part of the centre.

In the balance of East Devonport, a FoodWorks supermarket, bakery and café are located near the intersection of Tarleton Street and Torquay Road. A selection of other freestanding retailers are located along Tarleton Street including a liquor store on Riverview Avenue to the south and Peter & Una Seafoods to the north.

Given that the Spirit of Tasmania terminal is to be relocated to the south, Council should consider how to support and reinvigorate East Devonport Village during the transition period, as well as review if additional retail shops are needed closer to the new terminal.

William Street

A range of retail stores and some commercial uses are located along William Street and Steele Street to the south of the Fourways precinct. The majority of the retailers are fast food outlets and casual restaurants, and include some leading national brands such as KFC, Hungry Jack's and Zambreno. A large Cellarbrations liquor store is located in the south, which replaced the Robert Fergusson showroom (which was the former Retravisio outlet).

Valley Road

A small strip centre is located opposite Tas TAFE on Valley Road. It consists of an IGA X-press supermarket, a TerryWhite Chemmart pharmacy, a medical centre, a hairdresser and a takeaway food outlet. The centre serves the top-up food and convenience shopping needs of residents in the immediate local area. It is located on a prominent site and is well placed to continue its role in serving the convenience needs of residents, students and local workers.

Spreyton

Spreyton is a satellite suburb of Devonport located in the southern part of the Devonport municipality some 5km from the Devonport CBD. A range of retail and some commercial uses are dispersed along Mersey Main Road, a key traffic route linking Devonport with Latrobe and other localities to the south. The traffic route can become relatively busy in peak periods.

A well-presented Supa IGA supermarket serves the grocery needs of residents, while a selection of fresh food stores, takeaway food outlets, a liquor store and some arts/crafts/gifts stores are also provided. As of April 2022, there were a number of vacant tenancies, though overall the current retailers appear to be performing well. The centre would benefit if the existing shops and services were better connected and integrated.

Other

Various other small retail centres (such as along Forbes Street) and numerous other freestanding retail shops are located throughout Devonport. The far majority of the shops are small casual restaurants/takeaway food stores and retail services such as hairdressers and beauty salons. These retailers serve mostly localised catchments, catering to the convenience needs of residents.

Large Format Retail/Commercial Precincts

Don Road

A range of showroom retail and commercial uses are located on Don Road in the western part of Devonport. The centre provides a range of large format retail outlets including a Becks Mitre 10 hardware store, RSEA Safety as well as flooring, furniture and electrical stores. Other retail shops are mostly cafes and casual restaurants serving the daytime workforce as well as residents in the evenings. The commercial uses include car dealerships, auto parts outlets, Reece Plumbing, amongst other businesses. Overall, the centre works well as a retail/commercial precinct serving the trade sector as well as residents, providing an ad hoc mix of businesses that require large footprints and likely lower rents.

Devonport Homemaker Centre

Opening in 2013, the Devonport Homemaker Centre is understood to be performing well. It is located on the Bass Highway, which ensures it is convenient to access from across Devonport and the surrounding region. The major anchors are Harvey Norman and Bunnings, together with BCF, Sleep n Style, Supercheap Auto, Autobarn and Shiploads Discount Store, while Anaconda recently opened. A service station component includes BP, McDonalds and Subway.

The centre effectively serves the homemaker/large format retail needs of residents throughout the region, which was identified in the 2008 Retail Strategy as a key component of the retail sector that was underrepresented in Devonport.

Other Outside Devonport City

Port Sorell

Two retail nodes are located in Port Sorell. A small village centre is provided on Club Drive and includes a Supa IGA supermarket, food outlets and some convenience retail shops. The second

retail node is located on Alexander Street and includes a neighbourhood shopping centre, anchored by a Woolworths supermarket, and a nearby Mitre 10 hardware store.

Latrobe

Latrobe provides a relatively extensive retail strip centre of street-based shops along Gilbert Street. It includes two small supermarkets (IGA Xpress and Hill Street Grocer), The Reject Shop, a range of food and beverage outlets and a mix of convenience shops. The strip centre is well-presented and would be effectively serving the daily convenience shopping needs of surrounding residents.

Sheffield

Sheffield includes a small cluster of shops and services along Main Street. It is anchored by a small IGA supermarket and provides a number of cafes and casual restaurants. The retail offer is sufficient for local residents to undertake daily convenience shopping, however those residents would need to regularly travel into Devonport to undertake more extensive shopping trips.

Ulverstone

A significant cluster of retail shops and services are provided in the Ulverstone Town Centre. This includes three supermarkets (Coles, Woolworths and IGA), a number of non-food anchor retailers (such as Harris Scarfe), an extensive provision of street-based retailing as well as various large format retail outlets (such as a Becks Mitre 10 hardware store).

Proposed Centres

Stony Rise Village (proposed centre)

A new neighbourhood shopping centre is proposed to be developed immediately south of the Devonport Homemaker Centre on Friend Street with a development application recently lodged. According to media reports, the 7,500 sq.m centre is to be anchored by a 4,000 sq.m Woolworths supermarket, and has an expected opening date in 2024. If approved, the centre has the potential to serve the convenience retail needs of residents in southern Devonport.

5.2 Existing Retail Provision

The existing provision of retail and vacant floorspace at the various centres located throughout the City of Devonport is based on a survey of the area undertaken on 12 and 13 April 2022. The survey involved recording the name, type and size of every shop in the municipality. The provision of retail floorspace by key retail category is detailed in Table 5.1.

In total there is an estimated 84,840 sq.m of occupied retail floorspace across the various centres in Devonport. Close to half is provided within, or near, the Devonport CBD, while the other largest centres in terms of retail floorspace are Devonport Homemaker Centre, Don Road and Fourways.

According to this information there was a total of 3,480 sq.m of vacant shopfront floorspace which would be suitable for retail uses. This reflects a vacancy rate of 3.9%, which is considered low and healthy for a regional city. However, some centres have vacancy rates over 10.0%, including Devonport East Village, Fourways and Forbes Street, which should be closely monitored to ensure the level of vacancy does not increase further.

Table 5.2 details the number of retail outlets across the various centres in Devonport.

Table 5.1: Existing Retail Floorspace – City of Devonport, April 2022

Centre	FLG	Food Catering	Non-Food	Large Format Retail	Services	Total Occupied	Vacant	Total	Vacancy Rate
<u>CBD</u>									
CBD Core	1,020	3,840	14,590	0	1,510	20,960	1,620	22,580	7.2%
CBD Best Street	6,680	270	5,590	0	240	12,780	0	12,780	0.0%
CBD Fringe	1,680	230	360	2,260	0	4,530	0	4,530	0.0%
CBD Mixed Use	210	0	1,580	1,310	0	3,100	0	3,100	0.0%
Total CBD	9,590	4,340	22,120	3,570	1,750	41,370	1,620	42,990	3.8%
<u>Devonport East</u>									
Devonport East Village	540	360	1,500	0	240	2,640	560	3,200	17.5%
Balance	1,090	300	0	0	0	1,390	0	1,390	0.0%
Total Devonport East	1,630	660	1,500	0	240	4,030	560	4,590	12.2%
<u>Other Retail Centres/Shops</u>									
Fourways	1,330	860	3,190	0	890	6,270	740	7,010	10.6%
William Street	1,000	1,190	80	0	0	2,270	0	2,270	0.0%
Forbes Street	160	130	0	0	380	670	80	750	10.7%
Valley Road	530	80	320	0	80	1,010	0	1,010	0.0%
Spreyton	1,580	380	680	0	0	2,640	280	2,920	9.6%
Other	330	700	300	0	460	1,790	0	1,790	0.0%
Total Retail Centres	4,930	3,340	4,570	0	1,810	14,650	1,100	15,750	7.0%
<u>Large Format Retail/Commercial Precincts</u>									
Homemaker Centre	0	330	0	16,080	0	16,410	0	16,410	0.0%
Don Road	0	640	1,200	6,540	0	8,380	200	8,580	2.3%
Total LFR Precincts	0	970	1,200	22,620	0	24,790	200	24,990	0.8%
City of Devonport	16,150	9,310	29,390	26,190	3,800	84,840	3,480	88,320	3.9%

Source: Nearmap; Ethos Urban (April 2022)

Table 5.2: Existing Number of Retail Outlets – City of Devonport, April 2022

Centre	FLG	Food Catering	Non-Food	Large Format Retail	Services	Total Occupied	Shop Vacant	Total
<u>CBD</u>								
CBD Core	7	30	66	0	16	119	13	132
CBD Best Street	3	3	4	0	2	12	0	12
CBD Fringe	3	2	2	3	0	10	0	10
CBD Mixed Use	1	0	4	4	0	9	0	9
Total CBD	14	35	76	7	18	150	13	163
<u>Fourways</u>								
Total Fourways	9	8	15	0	10	42	6	48
<u>Devonport East</u>								
Devonport East Village	3	3	4	0	3	13	5	18
Devonport East Balance	4	2	0	0	0	6	0	6
Total Devonport East	7	5	4	0	3	19	5	24
<u>Retail Centres/Shops</u>								
William Street	1	7	1	0	0	9	0	9
Forbes Street	2	2	0	0	4	8	1	9
Valley Road	1	1	1	0	1	4	0	4
Spreyton	4	3	2	0	0	9	3	12
Other	3	6	2	0	5	16	0	16
Total Retail Centres	11	19	6	0	10	46	4	50
<u>Large Format Retail Precincts</u>								
Homemaker Centre	0	2	0	6	0	8	0	8
Don Road	0	4	3	4	0	11	1	12
Total LFR Precincts	0	6	3	10	0	19	1	20
Total City of Devonport	41	73	104	17	41	276	29	305

Source: Ethos Urban (April 2022)

5.3 Change in Retail Provision Since 2008

The current provision of retail floorspace within the various retail centres in Devonport has been compared with the results from the floorspace audit undertaken for the previous 2008 Retail Strategy. There are some differences in the reporting of the floorspace figures since the previous study, such as separating out total food into fresh food/liquor (including supermarkets) and food catering (i.e. cafes, restaurants and takeaway food outlets) and separating out large format retail/homemaker floorspace from total non-food floorspace.

The estimated retail floorspace figures as at 2008, based on the new categories, is provided in the **Appendix**. The retail floorspace figures at 2008 in this report differ slightly from the figures quoted in the 2008 Retail Strategy due to inclusion of some additional tenancies and some tenancy size revisions.

There has been a substantial change to the retail landscape in Devonport since the time of the previous Retail Strategy in 2008. Most notably the following changes have occurred:

- The Devonport Homemaker Centre opened in 2013, which accommodates a number of leading national large format retailers including Harvey Norman and Bunnings. The relocation of the Harvey Norman from the CBD is primary reason for the large decline in large format retail floorspace in the CBD Core precinct.
- A range of new retail facilities were developed at the fringe of the Devonport CBD including the Hill Street Grocer and several large format retail stores on Oldaker Street, as well as some large format retail stores on Formby Road.
- An IGA supermarket was developed in Spreyton, replacing a former dated store on a nearby site.

The change in retail floorspace in each centre by category is detailed in Table 5.3

Table 5.3: Change in Retail Floorspace – City of Devonport, 2008 - 2022

Centre	FLG	Food Catering	Non-Food	Large Format Retail	Retail Services	Total Occupied	Vacant	Total
<u>CBD</u>								
CBD Core	560	1,210	-130	-1,930	-160	-450	1,140	690
CBD Fringe	1,680	230	360	-520	0	1,750	0	1,750
CBD Mixed Use	210	0	0	910	-80	1,040	0	1,040
CBD Best Street	210	120	190	0	190	710	0	710
Total CBD	2,660	1,560	420	-1,540	-50	3,050	1,140	4,190
<u>Devonport East</u>								
Devonport East Village	0	-200	-170	0	-80	-450	360	-90
Devonport East Balance	-100	0	0	0	0	-100	0	-100
Total Devonport East	-100	-200	-170	0	-80	-550	360	-190
<u>Retail Centres/Shops</u>								
Fourways	470	310	-765	0	-70	-55	80	25
William Street	1,000	370	-920	0	0	450	0	450
Forbes Street	80	-50	-100	0	380	310	80	390
Valley Road	0	-60	120	0	10	70	-70	0
Spreyton	530	200	600	-400	-160	770	280	1,050
Other	75	140	25	0	0	240	0	240
Total Retail Centres	2,155	910	-1,040	-400	160	1,785	370	2,155
<u>Large Format Retail Precincts</u>								
Homemaker Centre	0	330	0	16,080	0	16,410	0	16,410
Don Road	-480	390	-1,600	1,200	-80	-570	200	-370
Total LFR Precincts	-480	720	-1,600	17,280	-80	15,840	200	16,040
Total City of Devonport	4,235	2,990	-2,390	15,340	-50	20,125	2,070	22,195

Source: Nearmap; Ethos Urban

5.4 Summary and Implications

- The Devonport CBD is the main business hub serving the wider surrounding region and provides a broad range of retail, commercial, entertainment, administrative and community uses. The CBD, including the mixed-use areas that surround the retail core, provides an estimated 41,370 sq.m of retail floorspace.
- A broad range of other centres are located throughout Devonport including Fourways, Don Road, Devonport Homemaker Centre, Spreyton, Devonport East Village, William Street and various other small centres.
- According to a floorspace survey undertaken for the purposes of this study, there is an estimated 84,840 sq.m of occupied retail floorspace in the City of Devonport as at April 2022.
- The vacancy rate of retail floorspace is estimated at 3.9% overall, which is considered low and healthy for a regional city. However, some centres have vacancy rates over 10.0% which should be monitored.
- Since 2008, the amount of retail floorspace in Devonport has increased by an estimated 22,200 sq.m. Some of the most notable changes include the development of the Devonport Homemaker Centre and additional retail uses on the fringe of the CBD including Hill Street Grocer and some new large format retail outlets.

6 Retail Turnover and Demand Analysis

This Chapter provides detailed analysis of estimated retail turnover, escape spending and retail floorspace demand.

6.1 Retail Turnover

In order to prepare an analysis of escape spending and floorspace demand in the City of Devonport, it is necessary to examine the extent to which sales at local retail facilities are attributable to residents in Devonport.

An estimate of total retail sales for centres located in the City of Devonport has been prepared using industry benchmarks and our own judgement of likely trading performance based on observations made during the field visit as well as discussions with industry stakeholders.

Total turnover at all retail facilities in the City of Devonport is estimated at \$504.5 million, including an estimated \$295.8 million in retail turnover at shops located in the Devonport CBD and surrounds (being CBD Core, CBD Fringe, CBD Mixed Use, and CBD Best Street). This information is shown in Table 6.1.

An estimate of the share of sales that can be attributed to spending by residents of Devonport has also been determined, based on an assessment of the catchment areas served by each centre, the types and scale of retailers in each centre, an analysis of visitors as sourced from Near (refer Appendix) and the consultant's judgement of the overall trading patterns for retail facilities in Devonport.

The analysis found that retail outlets in the City of Devonport generate approximately \$295.4 million of retail turnover which can be attributed to residents in the municipality, representing approximately 59% of total retail sales in Devonport. The balance, or 41% of retail turnover in Devonport, is estimated to be derived from spending by non-residents, primarily those living in the balance of the Devonport Retail Catchment, although also including tourists and other visitors. This analysis finds that retailers in Devonport generate \$209.1 million of retail sales from residents outside Devonport, referred to as captured spending.

Table 6.1: Devonport Turnover Estimates by Centre, 2021

Centre	Total Sales (\$m)	Est. % of Sales by Residents of Devonport	Total Sales to Residents of Devonport (\$m)
CBD Core	\$117.7	54%	\$63.4
CBD Fringe	\$28.3	57%	\$16.0
CBD Mixed Use	\$13.9	52%	\$7.3
CBD Best Street	\$136.0	62%	\$84.3
Fourways	\$37.8	76%	\$28.7
William Street	\$14.7	80%	\$11.7
Forbes Street	\$3.5	80%	\$2.8
Valley Road	\$6.9	78%	\$5.4
Homemaker	\$55.1	40%	\$22.2
Don Road	\$31.5	42%	\$13.3
Devonport East Village	\$15.0	67%	\$10.0
Devonport East Balance	\$13.7	63%	\$8.7
Spreyton	\$20.2	69%	\$14.0
Other	\$10.3	74%	\$7.6
Total City of Devonport	\$504.5	59%	\$295.4

Source: Various sources; Ethos Urban

6.2 Escape Spending

Escape spending refers to the extent to which retail spending by residents in a particular region is directed to retail facilities located outside the region. A high level of escape spending typically indicates a relative lack of retail facilities in the area and may indicate latent demand for additional retail floorspace. It may also suggest that the range and type of retail facilities in a region are not meeting the needs of local residents, and that residents are therefore shopping outside the catchment to meet their needs.

In general terms, a usual outcome of reducing escape spending (thereby increasing local retail sales activity), is the creation of local jobs, particularly for young people who make up the majority of retail staff. This mostly leads to increased wages and salaries, and a stimulus to the local economy. Therefore, lowering the level of escape spending in an area benefits the local economy.

The broad analysis of escape spending presented here is based on estimates of available spending by City of Devonport residents (Chapter 3) and estimates of existing sales at retail outlets in Devonport that are attributable to local residents (refer previous Table 6.1).

The escape spending analysis indicates that as at 2021 there is escape spending by Devonport residents equivalent to \$60 million (refer Table 6.2). In other words, \$60 million of retail expenditure of residents in Devonport is being directed to retail facilities located outside Devonport. This represents approximately 17% of the total available retail spending by residents of Devonport.

This estimated level of escape spending is considered to be in-line with expectations of a dynamic retail sector, with the current provision of retail facilities able to largely meet the needs of the local community. It is noted that the level of escape spending in Devonport has declined since the time of the 2008 Retail Strategy, when it was estimated at 21%. The substantial drop is mostly attributed to the development of new retail facilities in the area over the past 14 years.

Escape spending in non-food retail product categories is estimated at 22%. This reflects the 'comparison shopping' nature of much of non-food retailing, and the willingness of consumers to travel further in order to undertake major shopping trips for products such as apparel, homewares and whitegoods. The level of escape spending in the non-food category has reduced significantly since the 2008 Retail Strategy, mostly reflecting the development of the Devonport Homemaker Centre.

The estimate of escape spending on food items is also in-line with normal expectations of a healthy retail sector, with a figure between 10% and 15% of available spending on food considered standard. This reflects the fact that people typically direct most of their grocery shopping to the closest major supermarket facility.

As expected, there is negligible escape spending in the retail services category, which is usually undertaken at the very local level.

Table 6.2: Escape Spending from the City of Devonport, 2021 (\$2021)

Factor	Food	Non-Food	Services	Total
Total Sales (\$m)	\$261.9	\$227.4	\$15.2	\$504.5
Sales to Devonport Residents (\$m)	\$173.2	\$111.5	\$10.8	\$295.4
Available Spending by Residents (\$m)	\$200.0	\$143.4	\$11.7	\$355.1
Escape Spending (\$m)	\$26.9	\$32.0	\$0.9	\$59.7
Escape Spending as % of Available Spending	13%	22%	8%	17%

Source: Ethos Urban

Overall, the analysis presented in Table 6.2 shows that there may be some minor scope to reduce levels of escape spending from the City of Devonport. While escape spending of 17% is within acceptable levels for a healthy retail sector such as in the City of Devonport, the analysis identifies a possible opportunity in the non-food sector to retain a higher share of local retail expenditure. It is noted that if the current provision of retail floorspace remains unchanged in Devonport, escape spending would likely increase over time from current levels due to growth in population and retail spending. Thus, a certain level of new retail development is required to maintain escape spending at current levels.

6.3 Retail Floorspace Demand and Supply Analysis

The demand for new retail floorspace in Devonport is created as a result of a range of factors including the following:

- Any current unmet demand for retail floorspace in the area created by the existing residents and visitors.
- Population growth in the region, which generates additional demand for retail goods and services over time.
- Opportunities for additional spending captured from outside the region, including from tourists and other visitors.
- Opportunities to increase the share of resident spending that is captured by retail facilities in the region (i.e. reducing escape spending).

These factors form the basis for the following assessment of the opportunity for new retail development in the City of Devonport over the period to 2036. An indicative assessment of future retail floorspace need is useful in identifying the magnitude of new development which needs to be accommodated by retail and strategic planning policy.

When forecasting the need for additional retail floorspace a retail spending model is often applied, in which projections of available spending and broad estimates of average trading levels are used to calculate the quantum of retail floorspace that a population can support.

The adopted retail spending model in this study takes into account the provision and sales of the current retailers, the estimated current level of escape spending, the likely level of sales captured from beyond Devonport and the projection of population growth in the region.

It is important to recognise that there is always a degree of uncertainty associated with forecasting over longer-term time periods, and this constraint applies in the following analysis of future retail floorspace need. The following analysis is intended as a broad guide of the potential for new retail floorspace over the forecast period. It should be viewed as indicative and not as a strictly defined limit or allocation of retail floorspace in Devonport over that period.

It is further noted that the projected population growth for the City of Devonport adopted in this report are conservative when compared with the aspirations of Council. If a higher rate of population growth is realised, then the demand for retail floorspace would increase.

The current situation of retail floorspace demand and supply is detailed in Table 6.3, which is based on the following inputs and assumptions:

- The total retail spending capacity of residents in Devonport at 2021 is estimated, as detailed in Chapter 3.
- A proportion of spending by residents in Devonport realistically able to be retained in the area is adopted. These are based on the current escape spending rates as detailed previously in Table 6.2.
- The potential sales that retailers in Devonport are expected to be able to capture from residents outside Devonport, including visitors, is estimated. This is based on the analysis

provided in Table 6.1, though with beyond spending increasing slightly to allow for additional spending captured from visitors to Devonport.

- An average trading level for existing retailers, based on industry averages and observations of current performance, is applied.

The above metrics provide an estimate of demand for retail floorspace in Devonport. The estimated demand is then compared with the existing supply to determine if there is an oversupply or undersupply of retail floorspace in Devonport. It is noted again that this analysis should be viewed as indicative and is based on the key assumptions adopted. Nevertheless, it does provide an indication of how effectively the current provision of retail uses is meeting the expected demand.

The retail floorspace demand analysis indicates that there is a **current shortfall of retail floorspace in the order of 10,000 sq.m in Devonport.**

In terms of retail floorspace by category, there is considered a need for the following:

- 4,400 sq.m of floorspace dedicated to food outlets including potentially a supermarket.
- 5,450 sq.m of non-food floorspace including potentially new large format retail outlets.
- 160 sq.m of retail services, which includes hairdressers/beauty salons and the like.

This analysis indicates that overall the scale of retail floorspace in Devonport broadly meets the needs of customers, though there is potential for some additional retail floorspace to be supported.

Table 6.3: Retail Floorspace Analysis, City of Devonport, 2021

Item	Food	Non-Food	Retail Services	Total
Devonport Retail Spending 2021 (\$m)	\$200.0	\$143.4	\$11.7	\$355.1
Spending Potentially Retained (%)	90%	80%	95%	86%
Potential Spending Retained (\$m)	\$180.0	\$114.7	\$11.1	\$305.8
Est. Share of Sales from Beyond Devonport (%)	35%	55%	30%	44%
Retail Sales Available for Devonport Retailers (\$m)	\$276.1	\$253.3	\$15.8	\$545.2
Average Trading Level (\$ per sq.m)	\$9,250	\$4,150	\$4,000	\$5,749
Retail Floorspace Demand (sq.m)	29,850	61,030	3,960	94,840
Current Retail Floorspace (sq.m)	25,460	55,580	3,800	84,840
Est. Retail Floorspace Shortfall (sq.m)	4,390	5,450	160	10,000

Source: MarketInfo; Ethos Urban

The analysis of future retail floorspace need created by population growth is detailed in the following Tables 6.4 to 6.5.

The amount of retail spending that can realistically be retained in Devonport is firstly detailed in Table 6.4, which is based on the following inputs and assumptions:

- The total retail spending capacity of residents in Devonport from 2021 to 2036 is estimated, as detailed in Chapter 3. It is reiterated that all retail spending estimates in this report are quoted in 2021 dollars, i.e. excluding retail price inflation.
- The proportion of spending by residents in Devonport realistically able to be retained in the LGA, as opposed to escaping the area, is applied as previously examined.
- The potential sales that retailers are expected to be able to capture from residents outside Devonport including visitors is estimated, again as previously applied.

- The resultant figures provide the total estimated retail spending from residents and visitors available to retailers in Devonport assuming an adequate range and provision of retail stores and services.

The analysis in Table 6.5 then converts the potential increase in retained retail spending into estimated additional retail floorspace need, based on the following inputs and assumptions.

- The estimated increase in retail spend captured from residents and visitors for each 5-year period is calculated based on the figures in Table 6.4. It is important to note that not all new retail spending will necessarily be directed to new retail facilities. A small share of the growth will be directed to existing retailers in Devonport. Therefore, new retail development potential is based on an assumption that 80% of the increase in new retail spending would be available to new retail developments.
- An average trading level for new retailers is then applied. The figures quoted are for 2021-2026, with the average trading levels expected to increase slightly over time.
- Applying the average trading levels to the increase in retail spending provides estimated demand for additional retail floorspace in Devonport for the various periods. Note these figures represent the net increase in supportable retail floorspace and that, in some instances, new retail development may replace existing retail facilities.
- The analysis finds that population growth in the region is expected to create the demand for an additional 13,950 sq.m of retail floorspace. The total estimated additional retail floorspace considered supportable in Devonport over the forecast period to 2036 is then calculated by adding the current estimated shortfall of retail floorspace in Devonport with the estimated additional retail floorspace need over the forecast period.

This analysis finds that there is the potential need for a further approximately **24,000 sq.m of retail floorspace** in Devonport by 2036 to effectively serve the needs of residents and visitors. It is noted that this figure does not include an allowance for parts of some retail premises which are focussed on serving the needs of the trade or non-household sector, which would slightly add to the demand for retail floorspace in Devonport. Though it is noted that premises dedicated to serving the trade sector are considered 'non-retail' and are therefore excluded from this analysis.

It is also noted that if a stronger rate of population growth occurs in Devonport than projected, then the assessed need for additional retail floorspace may be higher than the above estimate.

Table 6.4: Indicative Retail Spending Retained, Devonport, 2021 – 2036 (\$m)

Item	Food	Non-Food	Retail Services	Total
<u>Devonport Retail Spending</u>				
2021	200.0	143.4	11.7	355.1
2026	213.3	151.7	12.5	377.5
2031	228.1	161.0	13.4	402.6
2036	245.6	172.0	14.5	432.2
<i>Growth in Retail Spending 2021 to 2036</i>	+45.6	+28.6	+2.8	+77.0
<u>Retention of Retail Spending</u>				
<i>Est. Share of Retail Spending Retained</i>	90%	80%	95%	86%
<u>Potential Retained Spending in Devonport</u>				
2021	180.0	114.7	11.1	305.8
2026	191.9	121.4	11.9	325.2
2031	205.3	128.8	12.7	346.9
2036	221.1	137.6	13.8	372.5
<i>Growth in Retained Spending 2021 to 2036</i>	+41.0	+22.9	+2.7	+66.6
<u>Plus Retail Spend from Beyond Devonport</u>				
<i>Est. Proportion of Spend from Beyond Devonport</i>	35%	55%	30%	44%
<u>Est. Spend Available to Devonport Retailers</u>				
2021	276.1	253.3	15.8	545.2
2026	294.4	268.0	17.0	579.3
2031	314.9	284.4	18.2	617.5
2036	339.0	303.8	19.7	662.5
<i>Potential Growth in Retail Spend 2021 to 2036</i>	+62.9	+50.5	+3.8	+117.3

Source: MarketInfo; Ethos Urban

Table 6.5: Indicative Additional Retail Floorspace Supportable, Devonport, 2021 – 2036

Item	Food	Non Food	Retail Services	Total
<u>Sales Available to New Retail Facilities @80% of Growth (\$m)</u>				
2021-2026	14.6	11.7	0.9	27.3
2026-2031	16.4	13.2	1.0	30.6
2031-2036	19.3	15.5	1.2	36.0
Total 2021 - 2036	50.3	40.4	3.1	93.8
<u>Additional Supportable Retail Floorspace</u>				
<i>Ave. Sales for New Retail F'space 21-26* (\$ per sq.m)</i>	10,000	4,500	4,250	6,670
<u>Additional Floorspace Demand (sq.m)</u>				
2021-2026	1,460	2,610	210	4,280
2026-2031	1,570	2,800	230	4,600
2031-2036	1,770	3,170	250	5,190
Total Additional Retail Demand 2021 - 2036	4,800	8,580	690	14,070
<u>Est. Retail Floorspace Shortfall (sq.m)</u>				
As at 2021 (refer Table 6.3)	4,390	5,450	160	10,000
<u>Est. Additional Supportable Floorspace (sq.m)</u>				
Up to 2036	9,190	14,030	850	24,070

* Average trading levels for retailers are assumed to increase at 0.8 – 0.9% per annum.

Source: MarketInfo; Ethos Urban

6.4 Potential Retail Development Outcomes

The proceeding analysis finds that there is currently a retail floorspace shortfall of approximately 10,000 sq.m in Devonport, and this shortfall would increase to approximately 24,000 sq.m by 2036 if no further retail facilities are developed.

The actual development opportunities arising from this retail floorspace shortfall are difficult to predict and will be largely determined by property market dynamics and the response of the retail industry. However, in general terms the following opportunities are evident:

- An expansion in the provision of food outlets, including additional supermarket floorspace and a wider provision of food & beverage outlets (food catering).
- A large provision of non-food specialty space and some additional large format retail outlets.
- A minor increase in the provision of retail services.

The future opportunities are considered by retail type in the remainder of this Chapter.

Discount Department Store

Discount department stores (such as Target, Big W, Harris Scarfe and Kmart) are important anchor tenants for major retail centres such as the Devonport CBD, and serve a broad role as a sub-regional destination for a wide range of primarily non-food product categories. At present, the Devonport CBD contains Kmart and Harris Scarfe outlets.

The discount department store sector continues to face a generally challenging trading environment, particularly with the growth in online sales constraining the total market share achieved by the sector. In terms of operators, Kmart continues to actively look for opportunities, while Big W and Target have generally been focused on closing underperforming stores.

Given the population of the Devonport region, and that Devonport already includes Kmart and Harris Scarfe outlets, there is considered limited opportunity for a new discount department store in Devonport over the forecast period.

Supermarkets/neighbourhood centres

Supermarkets are important anchor retailers and generally attract high levels of customer traffic to a locality. There are currently two full-line supermarkets (with full-line generally considered to be at least 3,000 sq.m in size) in Devonport, as well as two in Ulverstone and one in Port Sorell. Therefore, five full-line supermarket are currently provided within the Devonport Retail Catchment.

A general benchmark often considered in the property industry is the provision of one major supermarket operator for every 8,000 to 10,000 people. The Devonport Retail Catchment contains a population of approximately 69,700 residents. On this broad measure there is demand for at least another full-line supermarket currently, and potentially another supermarket in the medium term.

This measure is also supported by the understanding that the Coles and Woolworths supermarkets in the Best Street precinct are trading very strongly, thereby indicating a need for additional supermarket floorspace.

Overall, there is considered to be an opportunity for a new full-line supermarket in Devonport currently. There is also considered to be the opportunity at the present time to refurbish and potentially expand the existing Coles and Woolworths supermarkets on Best Street to better serve the needs of customers and meet modern consumer expectations.

In the medium term, there is considered to be the need for further supermarket floorspace in Devonport as the population of the region increases. This could be in the form of expansions of existing stores or the development of new supermarkets.

Homemaker/large format retail

The Devonport Homemaker Centre opened in 2013 and additional retailers have opened at the centre over time. The centre is currently fully leased. Given the analysis in the report and observation of the current market, there is considered to be the opportunity for some additional large format retail outlets in Devonport. Ideally the new stores would be located near the Devonport Homemaker Centre or on Don Road.

Devonport CBD

The Devonport CBD is generally performing well and additional retail floorspace is considered supportable currently and in the future. More detailed recommendations for the CBD are provided in Chapter 7, though in general terms a range of mostly food and convenience retail is supportable at LIVING CITY, as well as other small scale new and refurbished retail facilities throughout the CBD and surrounding mixed-use areas.

Other

The assessed shortfall in retail floorspace indicates the opportunity for some additional retail at the various activity centres throughout Devonport. The mix and provision of retail uses at all centres needs to continually be updated to meet the changing needs of the consumer. Recommendations for new retail facilities at the other centres in Devonport is provided in the following Chapter 7, though there is considered a particular need for further retail facilities in East Devonport and Spreyton.

6.5 Summary and Implications

- An analysis of retail turnover suggests that retailers in Devonport overall generate around 41% of sales from people living outside the City of Devonport.
- Spending by residents of Devonport directed to retail facilities outside of the Local Government Area (escape spending) is estimated at 17% of total spending. This estimated level of escape spending is considered to be in-line with expectations of a healthy retail sector, indicating that the existing retail facilities are largely meeting the needs of the local community.
- A retail floorspace demand and supply analysis indicates a current shortfall of 10,000 sq.m of floorspace in Devonport. This shortfall of retail floorspace is expected to increase to approximately 24,000 sq.m by 2036 if no retail facilities are developed over the forecast period.
- There is considered to be an opportunity for a new full-line supermarket, additional food & beverage outlets, some non-food/convenience retail shops and more large format retail stores to serve the needs of the local community and visitors.

7 National Retailer Gap Analysis

This Chapter provides a high-level gap analysis of leading national retailers.

Table 7.1 lists the key national retailers currently present in Devonport, as well as identifies if the retailer is located at other regional cities of a similar scale to Devonport.

Table 7.2 details some leading national retailers located in the other selected regional cities though are not in Devonport.

The cities examined are located in the eastern mainland states of Australia, and some retailers may not currently have a presence in Tasmania. This list of retailers should be used as a broad guide only of the types of retailers that could potentially be supportable in Devonport.

Furthermore, this analysis does not suggest that national retailers are preferred over independent operators. It is simply an analysis of the types of leading retailers that are typically located in other regional cities. For the majority of retail precincts, it is important that a mix of national and independent operators are accommodated to ensure that the needs and preferences of shoppers are met.

Table 7.1: Leading National Retailers Located in Devonport

Town	Devonport	Gladstone	Tamworth	Traralgon– Morwell	Warragul	Bowral– Mittagong	Orange	Dubbo	Nowra– Bomaderry	Bathurst	Warrnambool
Postcode	7310	4680	2340	3844/3840	3820	2576/2575	2800	2830	2541	2795	3280
State	TAS	QLD	NSW	VIC	VIC	NSW	NSW	NSW	NSW	NSW	VIC
Retailer											
The Reject Shop	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Bunnings	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Super Cheap Auto	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
EB Games	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Harvey Norman	Y	Y	Y	Y	Y	-	Y	Y	Y	Y	Y
Just Jeans	Y	Y	Y	Y	-	Y	Y	Y	Y	Y	Y
Priceline	Y	-	Y	Y	Y	Y	Y	Y	Y	Y	-
Kmart	Y	Y	Y	Y	Y	-	Y	Y	Y	Y	Y
Rivers	Y	Y	Y	Y	-	Y	Y	Y	Y	Y	Y
Strandbags	Y	Y	Y	Y	-	Y	Y	Y	Y	Y	Y
Best & Less	Y	Y	Y	Y	-	-	Y	Y	Y	Y	Y
Petbarn	Y	Y	Y	-	Y	Y	Y	Y	Y	Y	-
Cotton On	Y	Y	Y	Y	-	Y	Y	Y	Y	-	Y
Sussan	Y	-	Y	Y	-	Y	Y	Y	Y	Y	Y
Jay Jays	Y	Y	Y	Y	-	-	Y	Y	Y	Y	-
Spendless Shoes	Y	Y	Y	Y	-	-	-	Y	Y	Y	Y
Toyworld	Y	-	Y	Y	Y	-	Y	-	-	Y	Y
Mitre 10	Y	-	-	-	-	Y	Y	Y	Y	Y	Y
Kathmandu	Y	-	Y	Y	-	-	Y	-	-	-	Y
Harris Scarfe	Y	-	-	Y	-	-	-	-	-	-	Y
Factorie	Y	-	-	Y	-	-	-	Y	-	-	-
Jeanswest	Y	-	-	Y	-	-	-	-	-	-	Y

Source: Ethos Urban

Table 7.2: Gap Analysis of Leading National Retailers

Town	Devonport	Gladstone	Tamworth	Traralgon– Morwell	Warragul	Bowral– Mittagong	Orange	Dubbo	Nowra– Bomaderry	Bathurst	Warrnambool
Postcode	7310	4680	2340	3844/3840	3820	2576/2575	2800	2830	2541	2795	3280
State	TAS	QLD	NSW	VIC	VIC	NSW	NSW	NSW	NSW	NSW	VIC
Retailer											
Aldi	-	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Dan Murphys	-	Y	Y	Y	-	Y	Y	Y	Y	Y	Y
Spotlight	-	Y	Y	Y	-	Y	Y	Y	Y	Y	Y
Officeworks	-	Y	Y	Y	-	Y	Y	Y	Y	Y	-
The Athlete's Foot	-	Y	Y	Y	-	Y	Y	Y	Y	-	Y
Fantastic Furniture	-	-	Y	Y	-	-	Y	Y	Y	Y	Y
Barbeques Galore	-	-	Y	Y	-	Y	-	Y	Y	-	Y
Pillow Talk	-	Y	Y	-	-	Y	Y	-	Y	Y	-
Michael Hill	-	-	Y	-	-	Y	Y	Y	-	Y	Y
Rockmans	-	-	Y	Y	-	Y	-	-	Y	Y	Y
Adairs	-	-	Y	-	Y	Y	Y	-	-	-	Y
Betta Electrical	-	Y	-	Y	-	Y	Y	-	-	Y	-
Forty Winks	-	-	Y	Y	Y	-	-	-	Y	-	Y
Bed Bath N' Table	-	-	-	-	-	Y	Y	Y	-	Y	Y
Katies	-	Y	Y	Y	-	-	-	-	Y	-	Y
Sportscraft	-	-	Y	-	-	Y	Y	Y	-	-	Y
JB Hi-Fi	-	-	Y	Y	-	-	-	Y	-	Y	-
Rebel Sport	-	-	-	Y	-	Y	-	-	-	-	Y
Lincraft	-	Y	-	-	-	Y	-	-	-	-	Y
Snooze	-	-	-	Y	-	-	-	Y	-	-	Y
Sunglass Hut	-	Y	Y	-	-	-	-	Y	-	-	-
Lorna Jane	-	-	Y	-	-	-	Y	-	-	-	-
Smiggle	-	-	-	Y	-	-	-	-	-	Y	-
Witchery	-	-	Y	-	-	Y	-	-	-	-	-

Source: Ethos Urban

8 Strategic Direction for Devonport Retailing

This Chapter provides a number of key recommendations to assist Council in guiding retail development in Devonport.

Devonport is an important regional centre serving a large rural and semi-rural hinterland, with the retail sector performing an important role in ensuring that Devonport acts as the retail and business hub serving north-western Tasmania.

Retailing provides vital economic activity which contributes to jobs and incomes, and has an important social role in the delivery of goods and services. It also contributes to the built environment and can provide an important sense of place for the community.

New retail development provides investment into the local economy and contributes to job creation and economic development. It can also provide the flexibility to accommodate change and innovation in the retail sector. An appropriate provision and mix of retail uses maximises the opportunity of retaining retail spending by local residents, as well as attracting spending from residents in the broader surrounding region and other visitors such as tourists.

Recommendation 1: Continue to support the primacy of the Devonport CBD

The Devonport CBD plays an important role in serving the wide range of needs of the surrounding regional catchment as well as tourists. This role should be maintained and enhanced through appropriate retail and other commercial development, with an aim of continuing to improve the vibrancy and attractiveness of the CBD.

The Devonport CBD needs to constantly evolve to meet the latest market conditions and the changing demands and expectations of shoppers and other users. Some buildings and retail tenancies in the CBD are aging, of low quality and poorly presented, and need to be improved to modern standards. In particular, some arcades in the CBD require investment with a focus on increasing visitation levels to support the retailers and businesses.

It is important that there is an ongoing process of improvement in urban design and retail function, which ensures that the attractiveness of the CBD as a place to visit and shop is maintained and improved. An integrated approach to development which includes both the public and private sectors has the potential to significantly improve the appeal of the older street-based parts of the Devonport CBD. As an example, King Street, which includes a number of vacancies and vacant sites, and lacks the vibrancy of other parts of the CBD, should be a key focus for redevelopment with improved public amenity.

It is important to ensure that the current planning controls and mechanisms for the Devonport CBD are suitable to facilitate and encourage appropriate development. Development within the CBD needs to continue, to ensure it remains relevant for the community and meets the needs of consumers. Increasing the mix and intensity of development will concentrate activity within the CBD and contribute to its vibrancy, benefiting the retail sector and other businesses.

Mixed-use developments with a range of retail, commercial and residential uses, which are generally lacking at present in the CBD, should be encouraged. Facilitating the development of more commercial space will increase the number of workers in the CBD, while high-density housing will attract more residents. Ongoing private investment is considered vital for the ongoing success of the Devonport CBD.

Council should continue to focus on increasing activity and attracting patrons to the CBD including local residents, local workers and visitors. The Devonport CBD should be promoted as a key destination for shopping and business activity, as well as an attractive place to visit for tourists, and

take advantage of its central location and well-established retail sector. It needs to continue to provide a unique experience and offer a broad range of retail types across food, convenience shopping, entertainment and higher-order comparison shopping facilities. A good quality and diverse retail offering in the CBD will assist in maximising the retail spend in the area, which in turn will support a broad retail offering. Ensuring that the retail offer and opening times meet the expectation of tourists is considered critical.

Overall, it is important to continue to recognise the Devonport CBD as a key destination for business and shopping for the Devonport community and visitors. Its unique character and diversity of businesses should be valued and celebrated. It should also be promoted as a suitable place for retail, commercial and mixed-use developments, with a focus on regional-level retail, commercial, community and administrative functions. It is vital that private and public investment in the CBD continues so that it can evolve to meet the changing needs of the community.

Actions

- Ensure that all major retail development proposed in Devonport outside of the CBD be properly assessed to ensure the primacy of the Devonport CBD is protected.
- Ensure the planning controls and mechanisms for the Devonport CBD are suitable so that appropriate redevelopment opportunities which respond to market demand are encouraged.
- The ongoing evolution of the Devonport CBD should be supported by actively seeking an ongoing program of new developments and redevelopments of existing buildings subject to appropriate heritage and urban design guidelines.
- Encourage intensive mixed-use developments across the CBD which accommodate a mix of retail, commercial and residential uses as well as optimise urban design outcomes. Supporting commercial office developments and attracting commercial office businesses to the CBD should be a focus.
- Encourage property owners to invest in maintaining and improving the quality and presentation of their buildings.
- Examine ways to improve the night-time economy in the CBD, such as encouraging more clustering of restaurants as well as investing in improved lighting and streetscapes.
- Promote the Devonport CBD as a convenient and vibrant place to shop and undertake business. Implement programs to engage residents and attract visitors and tourists such as marketing campaigns and hosting events. Rooke Street Mall, as well as the unique and diverse range of other shopfront business throughout the CBD, should be celebrated.
- Continue to improve the walkability of the CBD, though also ensure it is easy to access by public transport and by car. Ensure that wide consultation is undertaken before deciding if cars should return to Rooke Street Mall.
- Encourage mixed-use developments with increased intensity on sites within the Urban Mixed Use zone that surrounds the CBD, though ensuring the primacy of the CBD is always protected. Retail development which requires car access from Formby Road should be carefully assessed given the traffic route can become congested during peak periods.
- Encourage retail offerings to meet the expectation of tourists and other visitors, including through appropriate opening times of businesses.
- Build on the success of LIVING CITY and encourage developments in the CBD to take advantage of river frontage.

Best Street Precinct

A key strength of the CBD is the concentration of several national retailers in the one location on Best Street, creating a key destination for retail activity. However, there has been limited capital investment in some of the buildings on Best Street, which could be improved to meet the expectation of today's consumer.

There are considered opportunities for more intensive development of some sites in the precinct which could provide commercial and residential uses as well as a more integrated and pedestrian friendly shopping environment. The car parking serving the two major supermarkets could be improved with better connectivity.

Actions:

- Encourage capital investment in the key private buildings and adjoining car parks that accommodate retail uses.
- Encourage more intense developments which cater to the needs of the community and optimise urban design outcomes.
- Support appropriate redevelopment and expansion of the two major supermarkets.

LIVING CITY - CBD Extension

LIVING CITY is emerging as a vibrant extension of the Devonport CBD and effectively connects the CBD with the Mersey River. Many parts of the precinct have now been completed such as a new car park, Market Square Pavilion, Council offices, service centre, library, arts centre and open space, while the hotel is nearing completion.

The next stage of LIVING CITY – Stage 3 on Fenton Way – has the potential to continue to lift visitation levels to the CBD and further increase activity in the area. The retail precinct of the project has the opportunity to provide a broad range of shops and other businesses that can become a key destination for retail and service activity in the area.

Actions:

Promote LIVING CITY as a key destination for retail and business activity in the Devonport CBD, which is easily accessible and provides a strong connection with the established parts of the CBD including Rooke Street Mall. The retail offer of Stage 3 would ideally provide a market vibe and is recommended to include the following:

- A blend of national brands and local operators, to maximise the customer base served by the retail precinct though also ensuring a unique offering.
- A range of fresh food stores which can showcase the local produce of the region.
- A cluster of casual restaurants which can activate the area during the day as well as in the evening to support the high-time economy of the CBD. Ideally, the restaurants would provide a diverse range of cuisines at various price points to cater for a diverse customer base.
- A number of destination retailers and businesses to ensure patrons are consistently attracted to the precinct. Ideally, the operators would focus on promoting retail as an experience rather than just a place to shop.
- An opportunity for pop up stores, which could be leased on short term contracts.

In general terms, Stage 3 of LIVING CITY on Fenton Way is not considered an appropriate location for large homemaker type retailers, which are recommended to be located in a homemaker precinct. The retail offer should be specifically tailored to the needs of the community and visitors, and where appropriate provide uses which promote and celebrate Devonport.

Recommendation 2: Better define a retail centre hierarchy for Devonport

The Tasmanian Planning Scheme outlines a number of zones which provide for retail facilities including Central Business (Devonport CBD), General Business (Fourways), Local Business (various centres), Urban Mixed Use and Commercial (Homemaker Centre, Don Road and part of Formby Road). While these zones provide high-level guidance of the types of uses encouraged, it is recommended that a clearer retail centre hierarchy is defined that describes the specific role, function and theme of each centre in the City of Devonport. It is noted that at present East Devonport Village as well as the three shops at the intersection of North and William Street are both in the Local Business zone, despite the vastly different roles they serve.

A clearly defined retail centre hierarchy can be an important tool in describing the role of centres and guiding the type and extent of retail provision in each centre. The retail centre hierarchy should reflect that different sized centres perform varying roles in retailing and related activities.

An appropriately defined hierarchy would assist in planning for the efficient delivery of retail and business services, and would provide greater certainty for stakeholders including Council, developers, property owners and businesses. It would also provide an important reference point in assessing applications for retail developments in the various zones. It is noted that the lack of a clearly defined retail centre hierarchy can result in ad hoc and reactive decision-making which increases uncertainty for stakeholders and can result in sub-optimal development outcomes.

Actions:

- Clearly define a retail centre hierarchy to assist in guiding the appropriate scale and type of new retail development in each centre, as well as assist in assessing development applications.
- Once defined, maintain and support the retail centre hierarchy. If any changes to the nominated retail activity centre hierarchy are required, it would need to be clearly justified and consistent with the policy objectives of Council.

Recommendation 3: Support appropriate retail development

The provision of an appropriate level of retail facilities for residents and visitors is important to drive economic activity and investment, support existing businesses and create jobs. If a sufficient level of retail facilities are not provided to serve the needs of the community, retail expenditure will escape Devonport to the detriment of existing businesses and residents.

It is important that policies facilitate appropriate development to maximise investment and economic activity in Devonport. New retail development provides the opportunity to accommodate change and innovation in the retail sector. It also increases the opportunity of retaining additional retail spending in the municipality by residents as well as maximising the retail spending by visitors including tourists.

This is particularly important as the retail sector in the City of Devonport also serves residents of the adjoining municipalities. Tangible economic benefits are available to Devonport associated with ensuring that spending by City of Devonport residents and residents of the surrounding municipalities is retained locally, rather than escaping to other major regional cities.

A planning process for retail development in Devonport which identifies and facilitates appropriate development will support private investment and maximise economic activity. Where practical, new retail developments are recommended to integrate with established transport and community infrastructure to ensure efficient and sustainable outcomes.

Actions:

- Support, facilitate and encourage appropriate development for new or expanded retail facilities, as well as the redevelopment of existing facilities, while ensuring developments are in accordance with the retail centre hierarchy and Council's strategic planning objectives.

Recommendation 4: Promote development which consolidates activity in established centres and reduces fragmentation

The clustering of retail and business activity in well-defined centres contributes to the vibrancy and commercial viability of shops and other businesses in a centre. A fragmented retail offer unnecessarily dilutes activity and vibrancy, is less convenient for consumers and can result in inefficient use of land and infrastructure

Important benefits can be gained from providing a broad range of facilities at activity centres. The concentration of a mix of uses in an activity centre contributes to sustainability and improved efficiencies by reducing the need for multiple trips associated with shopping, business activity, education and community interaction. Reducing trips also leads to a reduction in private car use and urban congestion and improves pedestrian safety.

Actions:

- Support the consolidation of retail, community, entertainment, and other business development within the hierarchy of activity centres in Devonport. This includes identifying key development sites within established centres that can potentially accommodate retail and commercial facilities. East Devonport Village and Spreyton are two examples which would benefit substantially from a consolidation of retail and business facilities.
- Retail development outside the defined activity centres should be discouraged, though it is noted that new centres may need to be created at times subject to the needs of the community.

Recommendation 5: Support the ongoing operation and evolution of activity centres in Devonport

There are numerous activity centres located throughout Devonport as detailed in Chapter 5 of this study. It is recommended that Council better define the roles of all activity centres in Devonport, and assist in supporting and promoting the centres as destinations for shopping and business activity. Council should also aim to strengthen the centres by encouraging appropriate development that reinforces the defined role of each centre.

The various smaller centres, such as along Valley Road and Forbes Street, should also be recognised as important contributors to the retail network at the local level. The centres provide convenience retail shops and services for local residents and workers, including within a walkable catchment.

Actions:

- Define the role and theme of each activity centre, as well as provide a vision and aspirations for future development.
- Promote and celebrate the unique characteristics of each activity centre in Devonport, with a focus on increasing activity as well as encouraging appropriate investment and development.
- Encourage ongoing private investment in the quality and presentation of retail and shop tenancies.
- Contribute public investment to improve the presentation and vibrancy of centres through inputs such as streetscaping and hosting events.

- Consult and work with existing businesses and retailers to ensure their voices are heard and their needs met where appropriate.

Further recommended actions for specific centres are provided following.

Don Road

A range of retail and commercial uses are provided on Don Road, which benefits from high exposure and relatively convenient accessibility from the surrounding region. Don Road is considered an appropriate location for an ad hoc mix of customer serving businesses which require relatively large footprints. It is recommended that Council define the role of the Don Road precinct more clearly and assist in strengthening the centre by encouraging more tenants which contribute to the defined role of the centre.

It is considered appropriate for Don Road to function, and be better known as, a key large format retail precinct, secondary to the Devonport Homemaker Centre. Other commercial uses which require large areas should also be supported. Don Road is a suitable location for a diverse mix of facilities which serve the needs of both businesses and residents.

Actions:

- Develop a vision for the Don Road precinct and ensure appropriate controls are in place to support this vision.
- Encourage the ongoing evolution of the Don Road precinct with a focus on providing a mix of commercial and retail uses that require large footprints. Fine grain retail outlets, such as small shops, should be discouraged, though a provision of food outlets to mostly serve workers and visitors to the precinct should be provided.

Large Format Retail and Homemaker Centre

The Devonport Homemaker Centre provides a range of national retailers and is understood to be trading well. The centre is important as it assists in retaining homemaker expenditure in Devonport, which was escaping the municipality before the development of the centre. In particular, the level of escape spending in the non-food category has reduced significantly since the 2008 Retail Study, partly reflecting the development of the centre.

As the resident population of Devonport and the surrounding region continues to grow, there will be a need for additional large format retail outlets in Devonport. The demand analysis reveals that there is currently a shortfall of 4,600 sq.m of non-food retail floorspace, increasing to 13,000 sq.m by 2036, some of which would be appropriately served by new large format retail outlets.

In addition, as demonstrated in the gap analysis provided in Chapter 7, there are several national large format retailers who typically operate stores in regional cities with a similar population base to Devonport that do not currently have a presence in the area.

Actions:

- Liaise with developers and retailers to ensure that there is sufficient land available to accommodate the development of large format retail facilities at appropriate locations.
- Support and facilitate the development of additional large format retail outlets at appropriate locations subject to the market need being demonstrated.

Fourways

Fourways is generally a well presented, vibrant and active centre that provides a wide mix of retail shops and services. It performs well as a village hub serving the convenience shopping and service needs of the local community. However, some of shops appear somewhat dated which impacts on the overall ambience of the centre.

Actions:

- Improve the attractiveness and amenity of the centre through a range of direct and indirect actions such as investing in streetscaping, hosting events and encouraging private investment in shopfronts.
- Promote the centre as a highly convenient destination for daily shopping and community activity.
- Encourage development where it is consistent with the convenience role of the centre and optimises urban design outcomes.

East Devonport

East Devonport includes a Village Centre centred around Wright Street and a small cluster of shops on Tarleton Street. Strategic planning for retail development in East Devonport could be improved to provide a more structured approach to retail development in this part of Devonport and to encourage better integration of retail facilities in the area.

East Devonport Village contains a variety of retail shops and services, and should continue to be supported as the main destination for retail and commercial activity in East Devonport. The future relocation of the terminal for the Spirit of Tasmania further to the south may impact the centre to some degree. Therefore, the centre may need additional support during this transition period.

A number of vacant sites are located throughout East Devonport Village which creates a fragmentation of the retail facilities, with the shops near Thomas Street particularly being disconnected with the facilities on Murray Street. There is considered to be an opportunity to create a stronger, more connected centre with a village atmosphere that responds to the needs of local residents as well as visitors.

At present East Devonport does not provide a strong gateway into Tasmania for Spirit of Tasmania customers and visitors. There is considered to be an opportunity for the provision of retail uses throughout East Devonport to better showcase Northern Tasmania including its attractions as well as local produce and crafts.

The Tarleton Street precinct is more ad hoc in nature, though a small cluster of shops is located at the intersection with Torquay Road including a FoodWorks supermarket. Once the terminal for the Spirit of Tasmania is relocated, there may be an opportunity for additional retail and commercial uses in this locality.

There is considered to be a benefit in formally recognising East Devonport Village as a centre of a higher-order than Local Business in the planning scheme. This may encourage investment and development in the locality, to better respond to the needs of the community.

Actions:

- Implement a more structured approach to guide retail development in East Devonport Village to allow the centre to better fulfil its potential as a village centre serving the needs of residents and visitors to East Devonport.
- Recognise East Devonport Village as a centre of a higher-order than Local Business in the planning scheme to assist the centre in effectively catering to the needs of the community.
- Encourage and support development at East Devonport Village that improves the integration and connection of existing retail and business facilities.
- Promote East Devonport Village and support the traders where practical during the relocation of the terminal for the Spirit of Tasmania.

- Support new development and additional retail facilities along Tarleton Street where the market need for such uses is established, particularly once the terminal for the Spirit of Tasmania is relocated to the area.

Spreyton

Retailers and businesses in Spreyton primarily serve the area of Devonport to the south of the Freeway, as well as residents of the adjacent Latrobe and Kentish municipalities. There has been some rural residential development occurring in Spreyton and the areas to the south.

The Spreyton centre currently lacks integration, with retailers and businesses dispersed along Mersey Main Road. A strategic plan for Spreyton that focuses on improving the integration and clustering of businesses is recommended. A traffic plan for Spreyton would also be useful, as the level of traffic along Mersey Main Road, particularly during peak periods, is affecting the ultimate performance of the centre.

Actions:

- Better define the role of the Spreyton centre as a key neighbourhood centre serving the communities of Spreyton and the surrounding localities.
- Seek to improve the current fragmentation of facilities by supporting the integration and clustering of retail and commercial uses where practical.
- Review and better manage the high levels of vehicle traffic along Mersey Main Road.

Recommendation 6: Assess major retail development applications against appropriate criteria, including for developments outside established centres

The analysis undertaken for this study indicates that the future population and retail spending growth projected for the City of Devonport and the surrounding region will result in the need for expansions of existing activity centres and potentially the creation of new centres. In particular, the floorspace demand analysis in this study finds that there is a potential need for an additional 24,000 sq.m of retail floorspace in Devonport by 2036.

It is recommended that Council support major retail development applications where there is a clear demonstrated need and a market gap for the proposed development. Council would need to be satisfied that the proposed development would not have an adverse impact on the retail centre hierarchy of Devonport nor on the primacy of the Devonport CBD.

When assessing the need for new or expanded retail facilities, Council should request evidence that the additional retail floorspace is needed and will not have an adverse effect on the viability of any existing centre. This evidence should include an appropriate assessment of retail demand compared with retail supply, as well as consider the likely trading impacts on existing and approved centres from the proposed development. It should also provide analysis of the likely contribution to Net Community Benefit from the proposed development, which considers a range of factors such as community choice, job creation, activity centre vibrancy and centre implications.

While retail development should be encouraged to be provided in existing centres on land which is appropriately zoned, on occasion it may be appropriate for new retail development to be provided outside established centres. In some cases, a site may need to be rezoned to facilitate the development. Planning for new retail centres requires careful consideration to ensure that the market need for new retail facilities is balanced against the need to maintain the healthy operation of the existing retail centre hierarchy.

For any rezoning, Council would need to be completely satisfied that the proposed use cannot be accommodated within the existing centre hierarchy or on other appropriately zoned land.

Furthermore, the applicant must demonstrate that the proposed location is consistent with the urban context of the surrounding area, and that the proposed development would not impact on the local character and amenity.

For any site to be rezoned, it is preferred that it is located adjoined or close to an existing activity centre. Council would also need to be satisfied to a high degree that the rezoning and proposed development would not have any adverse impact on the retail centre hierarchy of Devonport and particularly the primacy of the Devonport CBD.

Actions:

- Support retail development applications where the proponent clearly establishes the retail need and market gap for the development, and where any adverse impacts on the retail centre hierarchy are within acceptable limits.
- For any major retail development or rezoning application, economic/planning analysis showing the market need, impact analysis and an assessment of Net Community Benefit should be requested. The analysis should be appropriately detailed, transparent and verifiable.

9 Conclusion

Devonport is an important regional centre serving a large rural and semi-rural hinterland, with the retail sector performing an important role in ensuring that Devonport acts as the retail and business hub serving north-western Tasmania. Over the past decade, there has been substantial change to the retail landscape in Devonport including the development of the Devonport Homemaker Centre, the opening of Hill Street Grocer and a provision of a range of new large format retail stores near the Devonport CBD.

Another critical change in Devonport is the commencement of LIVING CITY, the largest urban renewal project undertaken in regional Tasmania. LIVING CITY is transforming Devonport by creating a cultural heart, opening the city up to the waterfront, and further establishing the city as a key destination for business activity and visitors.

There is an estimated 84,840 sq.m of occupied retail floorspace across the various centres in Devonport. Close to half is provided within, or near, the Devonport CBD. The other largest centres in terms of retail floorspace are Devonport Homemaker Centre, Don Road precinct and Fourways. The vacancy rate of retail floorspace in Devonport is estimated at 3.9%, which is considered low and healthy for a regional city.

Since 2008, the time of the previous Retail Strategy prepared for the City of Devonport, the amount of occupied retail floorspace has increased by just over 20,000 sq.m. This is largely attributed to the development of new large format retail outlets, particularly at the Devonport Homemaker Centre.

Escape spending, which is a measure of retail spending by residents in a particular region being directed to retail facilities located outside the region, is estimated at a healthy 17% for Devonport. This has declined significantly since 2008, when it was estimated at 21%.

A retail floorspace demand analysis undertaken for this study finds that there is a current shortfall of retail floorspace in the order of 10,000 sq.m in Devonport. This estimated retail floorspace shortfall is estimated to increase to approximately 24,000 sq.m by 2036 if no retail development occurs over that period.

A vibrant retail sector is important for a thriving community, and the provision and scale of retail facilities needs to continually change to meet the requirements and preferences of the community. New retail development is important as it provides investment into the local economy and contributes to job creation. It can also provide the flexibility to accommodate change and innovation in the retail sector.

Devonport contains numerous activity centres with the existing retail facilities largely meeting the needs of the local community and visitors. Though it is important that activity centres evolve as the demands and needs of the community change. The following are some recommendations to assist Council in guiding retail development in Devonport:

- Continue to support the primacy of the Devonport CBD.
- Better define a retail centre hierarchy for Devonport.
- Support appropriate retail development.
- Promote development which consolidates activity in established centres and reduces fragmentation.
- Support the ongoing operation and evolution of activity centres in Devonport.
- Assess major retail development applications against appropriate criteria, including for developments outside established centres.

Appendix

Mobile Ping Data

Visitors to the Devonport CBD have been analysed using mobile phone ping data from Near, which provides home/evening location details and number of visits for customers.

Information on the evening location of visitors to the Devonport CBD is detailed in Table A1, including the average number of visits. The data is for the period from January 2021 to March 2022, therefore, restrictions due to the COVID-19 pandemic over this period would have impacted the results, particularly the proportion of international visitors.

The data shows that some 82% of visits to the Devonport CBD were from people residing in the Devonport Retail Catchment. The majority of customers live in Devonport, though there is also a significant proportion from the surrounding municipalities of Latrobe, Kentish and Central Coast.

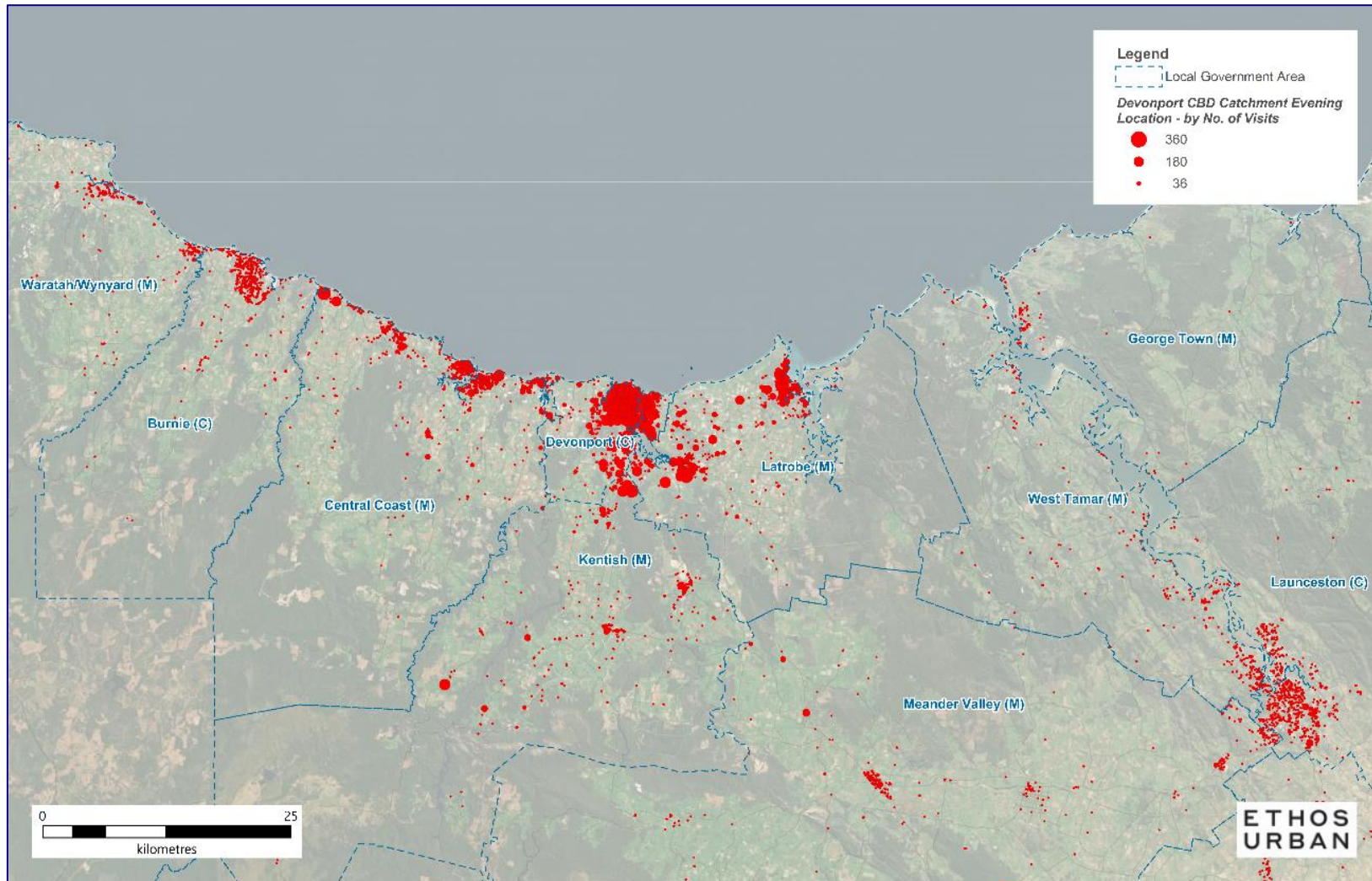
Figure A1 shows the evening locations of visitors to the Devonport CBD.

Table A1: Proportion of Visits and Visitors to Devonport CBD by Home Location

Area	Visitors % of total	Visits % of total	Average No. of Visits
Devonport	22.0%	53.6%	18
Latrobe	7.5%	14.3%	14
Kentish	2.7%	4.4%	12
Central Coast	<u>8.3%</u>	<u>9.4%</u>	<u>8</u>
Devonport Retail Catchment	40.6%	81.7%	15
Launceston and Surrounds	8.8%	2.9%	2
Burnie and Surrounds	6.5%	3.2%	4
Balance of Tasmania	<u>15.5%</u>	<u>5.2%</u>	<u>2</u>
Tasmania	71.3%	92.8%	9
Victoria	14.1%	3.6%	2
New South Wales	6.2%	1.3%	2
Balance of Australia	<u>8.1%</u>	<u>2.1%</u>	<u>2</u>
Australia	99.7%	99.9%	7
International	<u>0.3%</u>	<u>0.1%</u>	<u>2</u>
Total	100.0%	100.0%	7

Source: Near; Ethos Urban

Figure A1: Devonport CBD - Evening Location of Visitors



Source: Near; Ethos Urban

Retail Floorspace Type and Provision as at 2008

The following Table A2 provides a summary of the type and provision of retail floorspace in Devonport as at 2008, based on the 2008 Retail Strategy. Some of the categories have been amended to allow for a better understanding of the types of retail uses provided in each centre.

Table A2: Retail Floorspace Provision – City of Devonport, 2008

Centre	FLG	Food Catering	Non-Food	Large Format Retail	Retail Services	Total Occupied	Shop Vacant	Total	Vacancy Rate
<u>Devonport CBD</u>									
CBD Core	460	2,630	14,720	1,930	1,670	21,410	480	21,890	2.2%
CBD Best Street	6,470	150	5,400	0	50	12,070	0	12,070	0.0%
CBD Fringe	0	0	0	2,780	0	2,780	0	2,780	0.0%
CBD Mixed Use	0	0	1,580	400	80	2,060	0	2,060	0.0%
Total Devonport CBD	6,930	2,780	21,700	5,110	1,800	38,320	480	38,800	1.2%
<u>Fourways</u>									
Total Fourways	860	550	3,955	0	960	6,325	660	6,985	9.4%
<u>Devonport East</u>									
Devonport East Village	540	560	1,670	0	320	3,090	200	3,290	6.1%
Devonport East Balance	1,190	300	0	0	0	1,490	0	1,490	0.0%
Total Devonport East	1,730	860	1,670	0	320	4,580	200	4,780	4.2%
<u>Other Retail Centres/Shops</u>									
William Street	0	820	1,000	0	0	1,820	0	1,820	0.0%
Forbes Street	80	180	100	0	0	360	0	360	0.0%
Valley Road	530	140	200	0	70	940	70	1,010	6.9%
Spreyton	1,050	180	80	400	160	1,870	0	1,870	0.0%
Other	255	560	275	0	460	1,550	0	1,550	0.0%
Total Retail Centres	1,915	1,880	1,655	400	690	6,540	70	6,610	1.1%
<u>Large Format Retail Precincts</u>									
Homemaker Centre	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Don Road	480	250	2,800	5,340	80	8,950	0	8,950	0.0%
Total LFR Precincts	480	250	2,800	5,340	80	8,950	0	8,950	0.0%
Total City of Devonport	11,915	6,320	31,780	10,850	3,850	64,715	1,410	66,125	2.1%

Source: Retail Strategy 2008 (Essential Economics)