

2 June 2008

Grocery prices inquiry - Submissions
Australian Competition and Consumer Commission
GPO Box 520
MELBOURNE VIC 3001

E-mail: grocerypricesinquiry@accc.gov.au

Dear Sir/Madam

Public Submission to the Grocery Prices Inquiry by the Urban Taskforce Australia

Further to our public submissions made on 19 May 2008 and 11 March 2008 we wish to make a further submission, and in doing so, comment on the submission of the Shopping Centre Council of Australia dated 2 May 2008.

Shopping Centre Council's submission

The Shopping Centre Council represents the organisations that benefit most from the existing systems of State sponsored protection for shopping centre owners.

Like all groups enjoying a degree of monopoly power courtesy of government regulation, they will fiercely defend the status-quo.

There are a number of misleading and incorrect statements in the Shopping Centre Council's submission.

1. Retail property market is more heavily regulated than other property markets

The Shopping Centre Council says that

[w]hile planning controls restrict the location of and usage of retail space, they do not impose any greater constraint on the retail property market than they do on other property markets.

This is very wrong – no ifs, no buts.

In *Fabcot Pty Ltd v Hawkesbury Shire Council* (1997) 93 LGERA 373, the High Court held that planning laws do not concern themselves with "the mere threat of economic competition between competing businesses" except when it can detract from the provision of "shopping facilities."

That's why the planning system does not consider the impact on competitors for residential development, industrial development or heavy industry. Retail developments are treated more harshly because of the exception laid out in *Fabcot Pty Ltd v Hawkesbury Shire Council*. The current exception is an anomaly. It can be fixed by a stroke of the parliamentary pen. Importantly, as we discuss below, it can be fixed at a federal level.

Without reform we will continue to have anti-competitive rules that regulate retail development far more rigorously than any other form of development – with more controls than even mines, brothels and factories.

2. There mere fact that the amount of retail floor space has increased does not demonstrate that a free market is operating

The Shopping Centre Council says that

[t]here is no evidence, however, that as a result of these planning laws Australia has experience a shortage of retail floor space. As we outlined in our submission, Australia has seen a doubling of shopping centre floorspace over the past 15 years and an increase in the amount of shopping centre floorspace per capita of nearly 60% from 0.563 square metres in 1991-92 to 0.84 square metres in 2005-06.

The mere fact that the amount of retail floor space has increased does not demonstrate that an efficient free market is operating.

The growth in retail floor space can be explained by reference to the growth affluence of Australian society. The fact that growth has occurred does not mean that the additional retail floor space is being made available at the most efficient (competitive) price. Nor does it tell us how much additional retail floor space would have been made available if the market had been a free one. As table 5 shows in *Choice Free Zone* (page 101) per capita retail floor space in Australia is nearly half the levels of the United States.

3. The absence of anchors for major shopping centres should not be an issue

The Shopping Centre Council says that

[t]he main determinant of the availability of retail space available for lease in major shopping centres is not the planning system but the availability of major retailers to 'anchor' such shopping centres or anchor the redevelopments of shopping centres.

This statement almost proves our point on its own. The Shopping Centre Council admits there are constraints on the amount of retail floor space shopping centres can provide, because of the limited number of major retailers. They then highlight that a constraint on the business of shopping centres constrains the whole retail market.

This begs the question – why should retail growth be constrained by the commercial inability of shopping centres to provide a viable model beyond current levels? Why isn't the constraint on shopping centres (admitted to above) leading to a proliferation of independent or new entrant supermarkets to fill the gap? The answer is simple – the planning system confers a monopoly on the shopping centres. If they are unable to expand further because of commercial considerations (such as the absence of an additional major retailer) the whole community loses out.

The planning system should allow the supermarkets to set up with and compete with established shopping centres.

4. The beneficiaries of the current anti-competitive planning laws are the retail landlords, not the retailers

The Shopping Centre Council says that if controls have effectively limited the number of retailers and their ability to compete

one would expect to find that retailers themselves were making above-normal profits.

This statement would only be true if the retailers were in a position to enjoy the monopoly profits. However, the retailers, as tenants, don't have the whip hand - retail landlords do. The planning system gives the leverage to monopoly profits to the retail landlords

Table 1 of *Choice Free Zone* (page 75) shows that in Australia some retail landlords charge between 17 and 21 per cent of retail turnover as rent. This compares with 9 to 12 per cent in other countries.

5. A more market based system is the best way to secure a more efficient allocation of the economy's scarce resources

The Shopping Centre Council's submission echoes the central planners of Eastern Europe in the 1970s when it queries whether an increase in the aggregate supply of retail space would be positive

for the efficient use of the economy's scarce resources.

6. Vacancy rates in the existing shopping centres are not evidence that the market is competitive

The Shopping Centre Council cites vacancy rates in existing shopping centres as evidence that there is no shortage of retail space.

The fact that there are vacancies in existing shopping centre premises merely reflect the fact that, at a given point in time, supply exceeds demand. The costs of retail floor space are made artificially high in these shopping centres by the regulatory straight jacket imposed by planning laws. However, if a freer market were operating, the costs of retail floor space may be lower, and therefore the volume demanded by and supplied to retailers may be higher.

Impact of subregional strategies

To assist the commission, we have prepared a table showing how the NSW Government's draft subregional strategies impose a quota system on the provision of supermarkets in Sydney between now and 2031. These draft subregional strategies are already being applied by local councils. Similar documents exist for other urban areas across Australia.

Our table (which is attached) shows how the NSW Government's subregional strategies have classified and placed rules capping retail in 725 suburbs. In 568 suburbs supermarkets are banned altogether until 2031. In 79 suburbs only one small supermarket is permitted (these suburbs generally already have at least one supermarket). In 40 suburbs only two supermarkets are permitted (these suburbs generally already have at least two supermarkets). Only in 38 localities is there no express limitation on new supermarkets. Of course, in these locations, the key shopping centre sites have already been secured by the dominant retail landlords. Many of these areas are already heavily congested and there is little capacity for new shopping centres to be built.

A federal solution

We have noted with interest suggestions during the public hearings of the Commission that one solution to the planning issues might be to introduce a ban or restriction on competitors objecting to each other's developments.

We do not believe such a course of action, alone, will deal with the anti-competitive issues in the planning system.

Restrictions on who can object are easily circumvented through co-operation between shopping centre owners and local chambers of commerce, action groups, or affiliated businesses.

The issue is not who objects, but what matters can be legitimately raised and considered both in the zoning process and in the development assessment process.

So long as it is acceptable for planning authorities to make decisions in order to protect existing shopping centres from competition, the planning system will frustrate any efforts to encourage lower prices.

It should not be permissible for a planning authority to consider the impact on other retail businesses either when making zoning decisions, or when assessing individual developments. A "planning authority" should include both State governments and local councils. The Federal Parliament can take action on this front by enacting a new federal law.

A state planning law that prohibits a corporation from building a retail development should be declared **void** by federal law, unless the state planning law prohibits any direct or indirect consideration (by a planning authority) of any possible loss of trade that might be suffered by any other existing or future retail business or businesses.

This reform will force State governments to amend their planning laws to bring them into line with the new federal requirements. Planning authorities will remain free to make zoning and development assessment decisions based on issues such as traffic, visual amenity, noise, etc.

As always, we remain available to meet with officers of the ACCC and/or answer any requests you may have for additional information.

Yours sincerely

Urban Taskforce Australia



Aaron Gadiel
Chief Executive Officer

Encl.

QUOTA SYSTEM - NSW GOVERNMENT SUPERMARKET ALLOCATIONS TO 2031

SUBREGION	SUBURB / LOCALITY	GRADING	No. SUPERMARKETS
Inner North	North Sydney	Global City	N/A
East	Bondi Junction	Major Centre	N/A
North	Hornsby	Major Centre	N/A
Southwest	Campbelltown-Macarthur	Major Centre	N/A
South	Hurstville	Major Centre	N/A
South	Kogarah	Major Centre	N/A
West Central	Bankstown	Major Centre	N/A
North West	Blacktown	Major Centre	N/A
North West	Castle Hill	Major Centre	N/A
North West	Baulkham Hills	Major Centre	N/A
North West	Katoomba	Major Centre	N/A
North West	North Rocks	Major Centre	N/A
North West	Richmond	Major Centre	N/A
North West	Seven Hills	Major Centre	N/A
North West	Springwood	Major Centre	N/A
North West	St Marys	Major Centre	N/A
North West	Stanhope Gardens	Major Centre	N/A
North West	Windsor	Major Centre	N/A
Inner North	Chatswood	Major Centre	N/A
North East	Brookvale-Dee Why	Major Centre	N/A
East	Arden St Clovelly	Neighbourhood Centre	0
East	Barket St	Neighbourhood Centre	0
East	Bellevue Hill, Bellevue Rd	Neighbourhood Centre	0
East	Dover Heights, Blake St	Neighbourhood Centre	0
East	Kingsford, Botany St	Neighbourhood Centre	0
East	Coogee, Bream St	Neighbourhood Centre	0
East	Bronte Beach	Neighbourhood Centre	0
East	Byron St Coogee	Neighbourhood Centre	0
East	Carrington Rd Coogee	Neighbourhood Centre	0
East	Chifley	Neighbourhood Centre	0
East	Clovelly Beach	Neighbourhood Centre	0
East	Duffy's Corner Maroubra	Neighbourhood Centre	0
East	Edgecliff Rd Bondi	Neighbourhood Centre	0
East	Tamarama, Fletcher St	Neighbourhood Centre	0
East	Bondi, Glenayr Ave	Neighbourhood Centre	0
East	Randwick, Gilderthorpe Ave	Neighbourhood Centre	0
East	Bondi, Hall St	Neighbourhood Centre	0
East	Coogee, Havelock St	Neighbourhood Centre	0
East	La Perouse	Neighbourhood Centre	0
East	Little Bay	Neighbourhood Centre	0
East	Lugar St Bronte	Neighbourhood Centre	0
East	Lurline	Neighbourhood Centre	0
East	Bronte, Macpherson St	Neighbourhood Centre	0
East	West Maroubra, Maroubra Rd	Neighbourhood Centre	0
East	South Coogee, Moverley Rd	Neighbourhood Centre	0
East	Bondi, Murray St	Neighbourhood Centre	0
East	North Bondi, Murriverie Rd	Neighbourhood Centre	0
East	North Bondi	Neighbourhood Centre	0
East	North Randwick	Neighbourhood Centre	0
East	Woollahra, Ocean St	Neighbourhood Centre	0
East	Old South Head Rd/Dudley Rd	Neighbourhood Centre	0
East	Pagewood	Neighbourhood Centre	0
East	Rose Bay, Plumer Rd	Neighbourhood Centre	0
East	Bondi, Seven Ways	Neighbourhood Centre	0
East	South Coogee	Neighbourhood Centre	0
East	Watsons Bay	Neighbourhood Centre	0

East	West Randwick	Neighbourhood Centre	0
North	Cherrybrook, Appletree Dr	Neighbourhood Centre	0
North	Berowra Heights	Neighbourhood Centre	0
North	Brooklyn	Neighbourhood Centre	0
North	Cheltenham	Neighbourhood Centre	0
North	Dangar Island	Neighbourhood Centre	0
North	Castle Hill, David Rd	Neighbourhood Centre	0
North	Dural	Neighbourhood Centre	0
North	East Killara	Neighbourhood Centre	0
North	East Lindfield	Neighbourhood Centre	0
North	Turrumurra, Eastern Rd	Neighbourhood Centre	0
North	Waitara, Edgeworth David Ave	Neighbourhood Centre	0
North	Fox Valley	Neighbourhood Centre	0
North	Galston (Rural)	Neighbourhood Centre	0
North	Hornsby Heights, Galston Rd	Neighbourhood Centre	0
North	North Wahroonga, Hampden Ave	Neighbourhood Centre	0
North	Killara	Neighbourhood Centre	0
North	North Epping, Malton Rd	Neighbourhood Centre	0
North	Mt Colah	Neighbourhood Centre	0
North	Mt Colah Station	Neighbourhood Centre	0
North	Mt Ku-ring-gai	Neighbourhood Centre	0
North	Normanhurst, Myrtle St	Neighbourhood Centre	0
North	Normanhurst	Neighbourhood Centre	0
North	Turrumurra, Pennant Hills Rd	Neighbourhood Centre	0
North	Turrumurra, Princes St	Neighbourhood Centre	0
North	Epping, Plympton Rd	Neighbourhood Centre	0
North	Roseville Chase	Neighbourhood Centre	0
North	Thornleigh, Sefton Rd	Neighbourhood Centre	0
North	Hornsby Heights, Somerville Rd	Neighbourhood Centre	0
North	South Turrumurra	Neighbourhood Centre	0
North	St Ives Chase	Neighbourhood Centre	0
North	St Ives North	Neighbourhood Centre	0
North	West Gordon	Neighbourhood Centre	0
North	West Lindfield	Neighbourhood Centre	0
North	Wisemans Ferry	Neighbourhood Centre	0
Southwest	15th/22nd Ave	Neighbourhood Centre	0
Southwest	Airds	Neighbourhood Centre	0
Southwest	Belimbla Park (Rural)	Neighbourhood Centre	0
Southwest	Bradbury	Neighbourhood Centre	0
Southwest	Bringelly	Neighbourhood Centre	0
Southwest	Broadlands Village	Neighbourhood Centre	0
Southwest	Buxton	Neighbourhood Centre	0
Southwest	Cartwright	Neighbourhood Centre	0
Southwest	Casula	Neighbourhood Centre	0
Southwest	Catherine Field	Neighbourhood Centre	0
Southwest	Claymore	Neighbourhood Centre	0
Southwest	Cobbity (Rural)	Neighbourhood Centre	0
Southwest	Currans Hill	Neighbourhood Centre	0
Southwest	Douglas Park	Neighbourhood Centre	0
Southwest	Edmondson Ave/15th Austral	Neighbourhood Centre	0
Southwest	Edmondson Park	Neighbourhood Centre	0
Southwest	Flinders Ave Camden South	Neighbourhood Centre	0
Southwest	Glen Alpine	Neighbourhood Centre	0
Southwest	Glenfield Station	Neighbourhood Centre	0
Southwest	Goulburn St Liverpool	Neighbourhood Centre	0
Southwest	Governor Macquarie Shopping Centre	Neighbourhood Centre	0
Southwest	Green Valley Rd	Neighbourhood Centre	0
Southwest	Grimson Cres Liverpool	Neighbourhood Centre	0

Southwest	Harrow Rd Shops	Neighbourhood Centre	0
Southwest	Holsworthy	Neighbourhood Centre	0
Southwest	Ironbark Ave Camden	Neighbourhood Centre	0
Southwest	Kearns	Neighbourhood Centre	0
Southwest	Lagonda	Neighbourhood Centre	0
Southwest	Lakeside Chipping Norton	Neighbourhood Centre	0
Southwest	Lawrence Hargrave Dr Warwick Farm	Neighbourhood Centre	0
Southwest	Leppington	Neighbourhood Centre	0
Southwest	Lurnea	Neighbourhood Centre	0
Southwest	Macquarie Fields	Neighbourhood Centre	0
Southwest	Macquarie Fields Staion	Neighbourhood Centre	0
Southwest	Maddox Ave Moorebank	Neighbourhood Centre	0
Southwest	Maryvale Liverpool	Neighbourhood Centre	0
Southwest	Menangle	Neighbourhood Centre	0
Southwest	Minto Heights	Neighbourhood Centre	0
Southwest	Mt Annan South	Neighbourhood Centre	0
Southwest	Narellanvale	Neighbourhood Centre	0
Southwest	North Ave Rossmore	Neighbourhood Centre	0
Southwest	Oakdale	Neighbourhood Centre	0
Southwest	Picton Station (Rural)	Neighbourhood Centre	0
Southwest	Reservoir Rd Askcroft	Neighbourhood Centre	0
Southwest	Riley St Lurnea	Neighbourhood Centre	0
Southwest	Riverside	Neighbourhood Centre	0
Southwest	Ruse	Neighbourhood Centre	0
Southwest	Sadleir	Neighbourhood Centre	0
Southwest	Saywell Rd	Neighbourhood Centre	0
Southwest	Silverdale (Rural)	Neighbourhood Centre	0
Southwest	Sinclair Rd Ashcroft	Neighbourhood Centre	0
Southwest	Spring Farm	Neighbourhood Centre	0
Southwest	St Andrews	Neighbourhood Centre	0
Southwest	St Johns/Jindebyne Heckingburg	Neighbourhood Centre	0
Southwest	Waminda	Neighbourhood Centre	0
Southwest	Warragamba (Rural)	Neighbourhood Centre	0
Southwest	Warwick Farm Station	Neighbourhood Centre	0
Southwest	Wedderburn	Neighbourhood Centre	0
Southwest	Wilton (Rural)	Neighbourhood Centre	0
Southwest	Woodbine	Neighbourhood Centre	0
Southwest	Woodlands Liverpool	Neighbourhood Centre	0
South	Marrickville, Addison Rd	Neighbourhood Centre	0
South	Bangor	Neighbourhood Centre	0
South	Banksia	Neighbourhood Centre	0
South	Bardwell Park	Neighbourhood Centre	0
South	Beverly Hills North	Neighbourhood Centre	0
South	Blakehurst	Neighbourhood Centre	0
South	Belmore, Canterbury Rd	Neighbourhood Centre	0
South	Carlton South	Neighbourhood Centre	0
South	Carrs Park	Neighbourhood Centre	0
South	Como	Neighbourhood Centre	0
South	Dolls Point	Neighbourhood Centre	0
South	Canterbury, Dudley St/Canterbury Rd	Neighbourhood Centre	0
South	Dulwich Hills Station	Neighbourhood Centre	0
South	Peakhurst, Forest Rd	Neighbourhood Centre	0
South	Ashfield, Georges River Rd	Neighbourhood Centre	0
South	Lakemba, Haldon St/Canterbury Rd	Neighbourhood Centre	0
South	Heathcote	Neighbourhood Centre	0
South	Peakhurst, Isaac St	Neighbourhood Centre	0
South	Wiley Park, King Georges Rd	Neighbourhood Centre	0
South	Kogarah South	Neighbourhood Centre	0

South	Kyeemagh	Neighbourhood Centre	0
South	Kurnell	Neighbourhood Centre	0
South	Lewisham	Neighbourhood Centre	0
South	Lime Kiln Bay	Neighbourhood Centre	0
South	Monterey	Neighbourhood Centre	0
South	Moorefield	Neighbourhood Centre	0
South	Marrickville, New Canterbury Rd	Neighbourhood Centre	0
South	Oatley West	Neighbourhood Centre	0
South	Peakhurst	Neighbourhood Centre	0
South	Peakhurst North	Neighbourhood Centre	0
South	Peakhurst South	Neighbourhood Centre	0
South	Peakhurst West	Neighbourhood Centre	0
South	Penshurst West	Neighbourhood Centre	0
South	Tempe, Princes Highway	Neighbourhood Centre	0
South	Sydenham, Rowe Lane	Neighbourhood Centre	0
South	Sans Souci	Neighbourhood Centre	0
South	Sylvania	Neighbourhood Centre	0
South	Sylvania Heights	Neighbourhood Centre	0
South	The Kings Way	Neighbourhood Centre	0
South	Turrella	Neighbourhood Centre	0
South	William St/Kingsgrove Rd	Neighbourhood Centre	0
South	Woolooware Station	Neighbourhood Centre	0
North West	Aldgate St Prospect	Neighbourhood Centre	0
North West	Alfred Davis Shopping Centre 7 Hills	Neighbourhood Centre	0
North West	Annangrove (Rural)	Neighbourhood Centre	0
North West	Aquilina Dr Plumpton	Neighbourhood Centre	0
North West	Arthur St Baulkham Hills	Neighbourhood Centre	0
North West	Ash St Blacktown	Neighbourhood Centre	0
North West	Australia St St Marys	Neighbourhood Centre	0
North West	Banks Dr St Clair	Neighbourhood Centre	0
North West	Barabara Blvd Seven Hills	Neighbourhood Centre	0
North West	Barossa Dr Minchinbury	Neighbourhood Centre	0
North West	Bedford Rd Blacktown	Neighbourhood Centre	0
North West	Bella Vista	Neighbourhood Centre	0
North West	Belmore Rd Oatlands	Neighbourhood Centre	0
North West	Bidwill	Neighbourhood Centre	0
North West	Blackett	Neighbourhood Centre	0
North West	Bligh Park	Neighbourhood Centre	0
North West	Bullaburra	Neighbourhood Centre	0
North West	Bungarribee Rd Blacktown	Neighbourhood Centre	0
North West	Burnside	Neighbourhood Centre	0
North West	Cambridge Park	Neighbourhood Centre	0
North West	Carmen Dr Carlingford	Neighbourhood Centre	0
North West	Claudia St Toongabbie	Neighbourhood Centre	0
North West	Colyton	Neighbourhood Centre	0
North West	Cornelia Rd Toongabbie	Neighbourhood Centre	0
North West	Crestwood	Neighbourhood Centre	0
North West	Cross St Baulkham Hills	Neighbourhood Centre	0
North West	Day St Colyton	Neighbourhood Centre	0
North West	Dean Park	Neighbourhood Centre	0
North West	Derby St Penrith	Neighbourhood Centre	0
North West	Emerton	Neighbourhood Centre	0
North West	Emu Heights	Neighbourhood Centre	0
North West	Evans Rd Rooty Hill	Neighbourhood Centre	0
North West	Felton Rd Carlingford	Neighbourhood Centre	0
North West	Frederick St Blacktown	Neighbourhood Centre	0
North West	Fullham Rd Blacktown	Neighbourhood Centre	0
North West	Glenhaven (Rural)	Neighbourhood Centre	0

North West	Glenorie (Rural)	Neighbourhood Centre	0
North West	Glossodia (Rural)	Neighbourhood Centre	0
North West	Hambledon Rd Quakers Hill	Neighbourhood Centre	0
North West	Hassel Grove	Neighbourhood Centre	0
North West	Himalaya Cres Seven Hills	Neighbourhood Centre	0
North West	Hobertville	Neighbourhood Centre	0
North West	Hope St Seven Hills	Neighbourhood Centre	0
North West	Kellyville	Neighbourhood Centre	0
North West	Kemps Creek	Neighbourhood Centre	0
North West	Kenthurst (Rural)	Neighbourhood Centre	0
North West	Kerry Rd Blacktown	Neighbourhood Centre	0
North West	Kildare Rd Nth Blacktown	Neighbourhood Centre	0
North West	Kildare Rd Sth Blacktown	Neighbourhood Centre	0
North West	Kingswood Park	Neighbourhood Centre	0
North West	Knox Rd Doonside	Neighbourhood Centre	0
North West	Kurmond (Rural)	Neighbourhood Centre	0
North West	Kurrajong (Rural)	Neighbourhood Centre	0
North West	Lalor Park	Neighbourhood Centre	0
North West	Lancaster St Blacktown	Neighbourhood Centre	0
North West	Lapstone	Neighbourhood Centre	0
North West	Lemongrove	Neighbourhood Centre	0
North West	Leonay	Neighbourhood Centre	0
North West	Linden	Neighbourhood Centre	0
North West	Llandilo	Neighbourhood Centre	0
North West	Londonderry	Neighbourhood Centre	0
North West	Luddenham	Neighbourhood Centre	0
North West	Lynton St Blacktown	Neighbourhood Centre	0
North West	Marayong Station	Neighbourhood Centre	0
North West	Medlow Bath	Neighbourhood Centre	0
North West	Middle Dural (Rural)	Neighbourhood Centre	0
North West	Minchin Dr Minchinbury	Neighbourhood Centre	0
North West	Monfarville St St Marys	Neighbourhood Centre	0
North West	Mulgoa	Neighbourhood Centre	0
North West	North St Marys	Neighbourhood Centre	0
North West	Northcott Dr Lalor Park	Neighbourhood Centre	0
North West	Oxley Park	Neighbourhood Centre	0
North West	Pitt Town (Rural)	Neighbourhood Centre	0
North West	Quakers Hill East	Neighbourhood Centre	0
North West	Rainbow Shopping Centre Doonside	Neighbourhood Centre	0
North West	Reserve Rd Prospect	Neighbourhood Centre	0
North West	Richmond Rd Blacktown	Neighbourhood Centre	0
North West	Rupertswood Rd Rooty Hill	Neighbourhood Centre	0
North West	Sackville St Labor Park	Neighbourhood Centre	0
North West	Schofields	Neighbourhood Centre	0
North West	Shalvey Shops Shalvey	Neighbourhood Centre	0
North West	Smith St St Marys	Neighbourhood Centre	0
North West	Solander Shopping Centre Kings Langley	Neighbourhood Centre	0
North West	Stafford St South Penrith	Neighbourhood Centre	0
North West	Tallawong Ave Doonside	Neighbourhood Centre	0
North West	Tulloch St Blacktown	Neighbourhood Centre	0
North West	Turner St Blacktown	Neighbourhood Centre	0
North West	Valley Heights	Neighbourhood Centre	0
North West	Ventura Rd Northmead	Neighbourhood Centre	0
North West	Wall Park Ave Blacktown	Neighbourhood Centre	0
North West	Wallacia	Neighbourhood Centre	0
North West	Walters Rd Blacktown	Neighbourhood Centre	0
North West	Warrimoo	Neighbourhood Centre	0
North West	Werrington County	Neighbourhood Centre	0

North West	Whalan	Neighbourhood Centre	0
North West	Wilberforce (Rural)	Neighbourhood Centre	0
North West	Wilmot Shops	Neighbourhood Centre	0
North West	Windsor Rd Kellyville	Neighbourhood Centre	0
North West	Woodford	Neighbourhood Centre	0
Inner North	Agincourt Rd Marsfield	Neighbourhood Centre	0
Inner North	Alexandra St Hunters Hill	Neighbourhood Centre	0
Inner North	Allars St Denistone West	Neighbourhood Centre	0
Inner North	Avenue Rd Mosman	Neighbourhood Centre	0
Inner North	Avon Rd North Ryde	Neighbourhood Centre	0
Inner North	Badajoz Rd Ryde	Neighbourhood Centre	0
Inner North	Balaclava/Epping Rds Marsfield	Neighbourhood Centre	0
Inner North	Balmoral	Neighbourhood Centre	0
Inner North	Blaxlands Corner	Neighbourhood Centre	0
Inner North	Blenheim Rd North Ryde	Neighbourhood Centre	0
Inner North	Blue Point Rd McMahons Point	Neighbourhood Centre	0
Inner North	Burns Bay Rd Shops Lane Cove	Neighbourhood Centre	0
Inner North	Callaghan Rd Ryde	Neighbourhood Centre	0
Inner North	Castle Cove	Neighbourhood Centre	0
Inner North	Cobham Ave Melrose Park	Neighbourhood Centre	0
Inner North	David Ave North Ryde	Neighbourhood Centre	0
Inner North	Denistone Station	Neighbourhood Centre	0
Inner North	Doig Ave Denistone East	Neighbourhood Centre	0
Inner North	East Ridge	Neighbourhood Centre	0
Inner North	Fiveways Eastwood	Neighbourhood Centre	0
Inner North	Flinders Rd North Ryde	Neighbourhood Centre	0
Inner North	Garabaldi Hunters Hill	Neighbourhood Centre	0
Inner North	Greenwich	Neighbourhood Centre	0
Inner North	Greville St Shops Chatswood West	Neighbourhood Centre	0
Inner North	High St Shops Willoughby	Neighbourhood Centre	0
Inner North	High St Gladesville	Neighbourhood Centre	0
Inner North	Khartoum Rd Macquarie Park	Neighbourhood Centre	0
Inner North	Lane Cove West	Neighbourhood Centre	0
Inner North	Mowbray Rd Shops Land Cove	Neighbourhood Centre	0
Inner North	Maremburn	Neighbourhood Centre	0
Inner North	Northbridge East	Neighbourhood Centre	0
Inner North	Parriwi Junction	Neighbourhood Centre	0
Inner North	Penshurst/Boundary Sts Roseville	Neighbourhood Centre	0
Inner North	Pittwater Rd Gladesville	Neighbourhood Centre	0
Inner North	Quarry Rd Ryde	Neighbourhood Centre	0
Inner North	Spofforth St Mosman	Neighbourhood Centre	0
Inner North	Tennyson Rd Tennyson Point	Neighbourhood Centre	0
Inner North	Trafalgar Place Macquarie Park	Neighbourhood Centre	0
Inner North	Watts Rd Ryde	Neighbourhood Centre	0
Inner North	Waverton	Neighbourhood Centre	0
Inner North	Woolstonecraft	Neighbourhood Centre	0
Inner North	Woolwich	Neighbourhood Centre	0
North East	Adams St Curl Curl	Neighbourhood Centre	0
North East	Addison/High Sts Manly	Neighbourhood Centre	0
North East	Allambie	Neighbourhood Centre	0
North East	Allambie Heights	Neighbourhood Centre	0
North East	Arthur St Forestville	Neighbourhood Centre	0
North East	Aubreen St Collaroy Plateau	Neighbourhood Centre	0
North East	Bantry Bay Shops French Forest	Neighbourhood Centre	0
North East	Bayview	Neighbourhood Centre	0
North East	Beatrice/New Sts Balgowlah Heights	Neighbourhood Centre	0
North East	Bilambee Ave Bilgola	Neighbourhood Centre	0
North East	Bilgola	Neighbourhood Centre	0

North East	Bridge Rd Queenscliff	Neighbourhood Centre	0
North East	Brighton St Curl Curl	Neighbourhood Centre	0
North East	Burnt/Kirkwood Sts North Balgowlah	Neighbourhood Centre	0
North East	Carawa Rd Cromer	Neighbourhood Centre	0
North East	Careel Bay Shops	Neighbourhood Centre	0
North East	Church Point	Neighbourhood Centre	0
North East	Clareville	Neighbourhood Centre	0
North East	Collingwood St Queenscliff	Neighbourhood Centre	0
North East	Corrie Rd North Manly	Neighbourhood Centre	0
North East	Cromer Heights	Neighbourhood Centre	0
North East	Dobroyd Rd/Vista Ave Balgowlah Hgts	Neighbourhood Centre	0
North East	Elanora Rd Elanora Heights	Neighbourhood Centre	0
North East	Elvina Ave Shops Avalon	Neighbourhood Centre	0
North East	Fairlight	Neighbourhood Centre	0
North East	Frenchs Forest/Brook Rds Seaforth	Neighbourhood Centre	0
North East	Garden St North Narrabeen	Neighbourhood Centre	0
North East	Griffin Rd Curl Curl	Neighbourhood Centre	0
North East	Harbord Rd	Neighbourhood Centre	0
North East	Killarney Heights	Neighbourhood Centre	0
North East	Long Reef	Neighbourhood Centre	0
North East	Malcolm St North Narrabeen	Neighbourhood Centre	0
North East	Manly/Sydney Rds Seaforth	Neighbourhood Centre	0
North East	Mimosa	Neighbourhood Centre	0
North East	Montauban/Phillip Ave Seaforth	Neighbourhood Centre	0
North East	Moore Rd Harbord	Neighbourhood Centre	0
North East	Newport West	Neighbourhood Centre	0
North East	North Avalon Shops	Neighbourhood Centre	0
North East	North Balgowlah	Neighbourhood Centre	0
North East	North Narrabeen	Neighbourhood Centre	0
North East	Ocean Rd Shops Palm Beach	Neighbourhood Centre	0
North East	Palm Beach	Neighbourhood Centre	0
North East	Pitt Rd Curl Curl	Neighbourhood Centre	0
North East	Pittwater Rd Manly	Neighbourhood Centre	0
North East	Ralston Ave Belrose	Neighbourhood Centre	0
North East	Rayner St Narrabeena	Neighbourhood Centre	0
North East	Skyline Shops Frenchs Forest Rd	Neighbourhood Centre	0
North East	Sorlie Rd Frenchs Forest	Neighbourhood Centre	0
North East	South Creek Rd East Dee Why	Neighbourhood Centre	0
North East	Warriwood Beach Shops	Neighbourhood Centre	0
North East	Whale Beach Shops	Neighbourhood Centre	0
North East	Wheeler Heights	Neighbourhood Centre	0
Southwest	Leppington	Planned Major Centre	N/A
Southwest	Liverpool	Regional City	N/A
West Central	Parramatta	Regional City	N/A
North West	Penrith	Regional City	N/A
East	Banksmeadow	Small Village	0
East	Bellevue Hill	Small Village	0
East	Bondi Rd Rosebery	Small Village	0
East	Charing Cross	Small Village	0
East	Clovelly	Small Village	0
East	Five Ways Paddington	Small Village	0
East	Frenchmans Rd Randwick	Small Village	0
East	Gardeners Rd Rosebery	Small Village	0
East	Malabar	Small Village	0
East	Maroubra Bay	Small Village	0
East	Maroubra South	Small Village	0
East	Mascot Station	Small Village	0
East	Matraville	Small Village	0

East	Old South Head Rd	Small Village	0
East	Oxford St Darlinghurst	Small Village	0
East	Queen St Woollahra	Small Village	0
East	The Spot Randwick	Small Village	0
East	Vaucluse	Small Village	0
North	Berowra	Small Village	0
North	Berowra Heights	Small Village	0
North	Lindfield	Small Village	0
North	North Turramurra	Small Village	0
North	Pymble	Small Village	0
North	Roseville	Small Village	0
North	Warrawee	Small Village	0
North	Westleigh	Small Village	0
North	West Pennant Hills	Small Village	0
North	West Pymble	Small Village	0
Southwest	Ambarvale	Small Village	0
Southwest	Appin (Rural)	Small Village	0
Southwest	Bargo (Rural)	Small Village	0
Southwest	Chipping Norton	Small Village	0
Southwest	Edmondson Ave/10th Austral	Small Village	0
Southwest	Flowerdale	Small Village	0
Southwest	Hammondville	Small Village	0
Southwest	Harrington Park	Small Village	0
Southwest	Hoxoton Park Rd/Dorrigo Ave	Small Village	0
Southwest	Orange Grove	Small Village	0
Southwest	Prestons	Small Village	0
Southwest	Raby	Small Village	0
Southwest	Rosemeadow	Small Village	0
Southwest	St Helens Park	Small Village	0
Southwest	The Oaks (Rural)	Small Village	0
Southwest	Wattle Grove Plaza	Small Village	0
South	Allawah	Small Village	0
South	Arncliffe	Small Village	0
South	Belmore	Small Village	0
South	Beverly Hills	Small Village	0
South	Bexley	Small Village	0
South	Bexley North	Small Village	0
South	Canterbury	Small Village	0
South	Carlton	Small Village	0
South	Clemton Park	Small Village	0
South	Croydon Park	Small Village	0
South	Dulwich Hill	Small Village	0
South	Hurlstone Park	Small Village	0
South	Marrickville, Illawarra Rd	Small Village	0
South	Illawong	Small Village	0
South	Jannali	Small Village	0
South	Kareela	Small Village	0
South	Loftus	Small Village	0
South	Lugarno	Small Village	0
South	Narwee	Small Village	0
South	Petersham, New Canterbury Rd	Small Village	0
South	Oatley	Small Village	0
South	Penshurst	Small Village	0
South	Riverwood	Small Village	0
South	Ramsgate	Small Village	0
South	Ramsgate Beach	Small Village	0
South	South Hurstville	Small Village	0
South	Southgate	Small Village	0

South	Woolooware	Small Village	0
West Central	Berala	Small Village	0
West Central	Canley Heights	Small Village	0
West Central	Canley Vale	Small Village	0
West Central	Condell Park	Small Village	0
West Central	East Hills	Small Village	0
West Central	Edensor Park	Small Village	0
West Central	Ermington Shops	Small Village	0
West Central	Fairfield Heights	Small Village	0
West Central	Greenfield Park	Small Village	0
West Central	Greystanes Shopping Centre	Small Village	0
West Central	Harris Park	Small Village	0
West Central	Newington	Small Village	0
West Central	Pemulwuy Shopping Centre	Small Village	0
West Central	Pendle Hill	Small Village	0
West Central	Regents Park	Small Village	0
West Central	Revesby North	Small Village	0
West Central	Sefton	Small Village	0
West Central	Smithfield	Small Village	0
West Central	South Wentworthville	Small Village	0
West Central	Telopea	Small Village	0
West Central	Villawood	Small Village	0
West Central	Wakely	Small Village	0
West Central	Wetherill Park	Small Village	0
West Central	Abbotsbury	Small Village	0
West Central	Auburn South	Small Village	0
West Central	Auburn South West	Small Village	0
West Central	Bartlett St Ermington	Small Village	0
West Central	Birrong	Small Village	0
West Central	Bolivia St/Booyong St Cabramatta	Small Village	0
West Central	Bonnyrigg East	Small Village	0
West Central	Brenan St/Dublin St Smithfield	Small Village	0
West Central	Brenan St/Marlborough St Smithfield	Small Village	0
West Central	Brown Rd/Montgomery Rd Bonnyrigg	Small Village	0
West Central	Bossley Park	Small Village	0
West Central	Canberra St/Runcorn St St Johns Park	Small Village	0
West Central	Caroline Chisholm Shops	Small Village	0
West Central	Chapel Rd Canterbury Rd Shops	Small Village	0
West Central	Coleman St Shops	Small Village	0
West Central	Collette Park	Small Village	0
West Central	Cooks Hill	Small Village	0
West Central	Delwood Shops	Small Village	0
West Central	Denison St/Horley Dr Carramar	Small Village	0
West Central	Diff Ave/Hume Highway	Small Village	0
West Central	Dundas	Small Village	0
West Central	Fairfield East	Small Village	0
West Central	Fairfield Rd Shops	Small Village	0
West Central	Fairfield West	Small Village	0
West Central	Ferry Rd Lansvale	Small Village	0
West Central	Friend Way Mount Pritchard	Small Village	0
West Central	Georges Hall	Small Village	0
West Central	Guildford West	Small Village	0
West Central	Hamel Rd Mount Pritchard	Small Village	0
West Central	Hamilton Rd Fairfield West	Small Village	0
West Central	Harden St Canley Heights	Small Village	0
West Central	Hector St/Hume Highway Shops	Small Village	0
West Central	Hilltop Rd Shops	Small Village	0
West Central	Iron St North Parramatta	Small Village	0

West Central	John St/Gladstone St Cabramatta	Small Village	0
West Central	John St/Satara St Cabramatta West	Small Village	0
West Central	Kleins Rd Northmead	Small Village	0
West Central	Loscoe St/Horsley Dr Fairfield	Small Village	0
West Central	Marsden Rd/Victoria Rd	Small Village	0
West Central	Merrylands West	Small Village	0
West Central	Milperra	Small Village	0
West Central	Mount Pritchard	Small Village	0
West Central	Old Prospect Rd	Small Village	0
West Central	Rawson Rd/Ainslie St Fairfield West	Small Village	0
West Central	Rookwood Road Shops	Small Village	0
West Central	Sackville St/Malabar St Canley Heights	Small Village	0
West Central	Smithfield	Small Village	0
West Central	St Johns Rd/Avoca Rd Canley Heights	Small Village	0
West Central	Town View Rd/Parkside PI Mt Pritchard	Small Village	0
West Central	Westmead South	Small Village	0
West Central	Whitaker St/Broughton St Yennora	Small Village	0
West Central	Woodpark	Small Village	0
West Central	Yates Avenue Shops Dundas Valley	Small Village	0
North West	Blacktown Mega Court	Small Village	0
North West	Cambridge Gardens	Small Village	0
North West	Campbell St Northmead	Small Village	0
North West	Claremont Meadow	Small Village	0
North West	Coonara Ave West Pennant Hills	Small Village	0
North West	Emu Plains	Small Village	0
North West	Erskine Park	Small Village	0
North West	Faulconbridge	Small Village	0
North West	Glenbrook	Small Village	0
North West	Glenwood	Small Village	0
North West	Holbeche Rd Blacktown	Small Village	0
North West	Kingswood	Small Village	0
North West	Knightsbridge Castle Hill	Small Village	0
North West	Letherbridge Park	Small Village	0
North West	Luxford Rd Hassel Grove	Small Village	0
North West	Mt Victoria	Small Village	0
North West	Northmead Shopping Centre	Small Village	0
North West	Old Mt Druitt Village	Small Village	0
North West	Rouse Hill Village	Small Village	0
North West	South Windsor	Small Village	0
North West	Tregear Shops	Small Village	0
North West	Werrington Station	Small Village	0
Inner North	Artarmon	Small Village	0
Inner North	Boronia Park	Small Village	0
Inner North	Cammeray	Small Village	0
Inner North	Castlecrag	Small Village	0
Inner North	Chatswood East	Small Village	0
Inner North	Coxs Rd North Ryde	Small Village	0
Inner North	Cremorne Junction	Small Village	0
Inner North	Hunters Hill	Small Village	0
Inner North	Kirribilli	Small Village	0
Inner North	Meadowbank	Small Village	0
Inner North	Midway Ryde	Small Village	0
Inner North	Mosman Junction	Small Village	0
Inner North	Putney	Small Village	0
Inner North	Willoughby	Small Village	0
North East	Collaroy	Small Village	0
North East	Dee Why - The Strand	Small Village	0
North East	Elanora Heights	Small Village	0

North East	Forestville	Small Village	0
North East	Glenrose	Small Village	0
North East	Harbord-Lawrence St	Small Village	0
North East	Manly Vale	Small Village	0
North East	Narraweena	Small Village	0
North East	Narrabeen-Devitt St	Small Village	0
North East	North Narrabeen	Small Village	0
North East	Seaforth	Small Village	0
North East	Terrey Hills	Small Village	0
North East	Veterans Pde Collaroy Plateau	Small Village	0
East	Port Botany	Specialised Centres	N/A
East	Sydney Airport	Specialised Centres	N/A
East	Randwick Education & Health	Specialised Centres	N/A
South	Sydney Airport	Specialised Centres	N/A
West Central	Olympic Park-Rhodes	Specialised Centres	N/A
West Central	Bankstown Airport-Milperra	Specialised Centres	N/A
West Central	Westmead	Specialised Centres	N/A
North West	Norwest	Specialised Centres	N/A
Inner North	Macquarie Park	Specialised Centres	N/A
Inner North	St Leonards	Specialised Centres	N/A
East	Eastgardens	Stand Along Shopping Centre	N/A
North	Carlingford Court	Stand Along Shopping Centre	N/A
Southwest	Green Valley	Stand Along Shopping Centre	N/A
South	Roselands	Stand Along Shopping Centre	N/A
West Central	Bass Hill	Stand Along Shopping Centre	N/A
West Central	Chullora Market Place	Stand Along Shopping Centre	N/A
North West	Winston Hills	Stand Along Shopping Centre	N/A
North East	Warriewood Square	Stand Along Shopping Centre	N/A
East	Bondi	Town Centre	2
East	Double Bay	Town Centre	2
East	Eastlakes	Town Centre	2
East	Edgecliff	Town Centre	2
East	Maroubra Junction	Town Centre	2
East	Randwick	Town Centre	2
North	Epping	Town Centre	2
North	Gordon	Town Centre	2
Southwest	Camden (Rural)	Town Centre	2
Southwest	Carnes Hill	Town Centre	2
Southwest	Casula Mall	Town Centre	2
Southwest	Ingleburn	Town Centre	2
Southwest	Macarthur	Town Centre	2
Southwest	Moorebank	Town Centre	2
Southwest	Narellan	Town Centre	2
Southwest	Picton (Rural)	Town Centre	2
Southwest	Tahmoor (Rural)	Town Centre	2
South	Campsie	Town Centre	2
South	Caringbah	Town Centre	2
South	Cronulla	Town Centre	2
South	Marrickville Rd	Town Centre	2
South	Menai	Town Centre	2
South	Miranda	Town Centre	2
South	Rockdale	Town Centre	2
South	Stanmore	Town Centre	2
South	Sutherland	Town Centre	2
West Central	Auburn	Town Centre	2
West Central	Bonnyrigg	Town Centre	2
West Central	Chester Hill	Town Centre	2
West Central	Epping	Town Centre	2

West Central	Granville	Town Centre	2
West Central	Lidcombe	Town Centre	2
West Central	Merrylands	Town Centre	2
West Central	Revesby	Town Centre	2
Inner North	Eastwood	Town Centre	2
Inner North	Lane Cove	Town Centre	2
Inner North	Neutral Bay	Town Centre	2
Inner North	Ryde	Town Centre	2
North East	Manly	Town Centre	2
North East	Mona Vale	Town Centre	2
East	Botany	Village	1
East	Coogee	Village	1
East	Hillsdale	Village	1
East	Kensington	Village	1
East	Kingsford	Village	1
East	Mascot	Village	1
East	Oxford St Paddington	Village	1
East	Rose Bay	Village	1
North	Asquith	Village	1
North	Beecroft	Village	1
North	Cherrybrook	Village	1
North	Pennant Hills	Village	1
North	St Ives	Village	1
North	Thornleigh	Village	1
North	Turrumurra	Village	1
North	Waitara	Village	1
Southwest	Cecil Hill	Village	0
Southwest	Eagle Vale	Village	0
Southwest	Leumeah	Village	0
Southwest	Macquarie Fields	Village	0
Southwest	Miller	Village	0
Southwest	Minto Mall	Village	0
Southwest	Mt Annan	Village	0
Southwest	Thirlmere (Rural)	Village	0
South	Brighton-Le Sands	Village	1
South	Earlwood	Village	1
South	Engadine	Village	1
South	Gymea	Village	1
South	Marrickville, Illawarra Rd	Village	1
South	Kingsgrove	Village	1
South	Kirrawee	Village	1
South	Lakemba	Village	1
South	Marrickville Metro	Village	1
South	Mortdale	Village	1
South	Punchbowl	Village	1
South	St Peters	Village	1
South	Wolli Creek	Village	1
West Central	Carlingford	Village	1
West Central	Greenacre	Village	1
West Central	Guildford	Village	1
West Central	Padstow	Village	1
West Central	Panania	Village	1
West Central	Punchbowl	Village	1
West Central	Toongabbie	Village	1
West Central	Wentworthville	Village	1
West Central	Yagoona	Village	1
North West	Blackheath	Village	1
North West	Blaxland	Village	1

North West	Carlingford	Village	1
North West	Cranebrook	Village	1
North West	Doonside	Village	1
North West	Emerton Village Shopping Centre	Village	1
North West	Farnham Rd Quakers Hill	Village	1
North West	Glenmore Park	Village	1
North West	Hazelbrook	Village	1
North West	James Cook Dr Kings Langley	Village	1
North West	Lawson	Village	1
North West	Leura	Village	1
North West	Myrtle St Blacktown	Village	1
North West	North Richmond	Village	1
North West	Plumpton	Village	1
North West	Quakers Hill	Village	1
North West	Riverstone	Village	1
North West	Rooty Hill	Village	1
North West	Round Corner	Village	1
North West	South Penrith	Village	1
North West	St Clair	Village	1
North West	Wentworth Falls	Village	1
North West	Woodcroft Plaza	Village	1
North West	Wrights Rd Kellyville	Village	1
Inner North	Crows Nest	Village	1
Inner North	Gladesville	Village	1
Inner North	Northbridge Junction	Village	1
Inner North	Spit Junction	Village	1
Inner North	West Ryde	Village	1
North East	Avalon	Village	1
North East	Balgowlah	Village	1
North East	Narrabeen Waterloo St	Village	1
North East	Newport	Village	1