## PROPOSED RETAIL CENTRE, BLOOMFIELD

## REVIEW of ECONOMIC IMPACT ASSESSMENT

Prepared for

ORANGE CITY COUNCIL

Background

As requested, we have reviewed a report prepared by consultants Location

IQ for James Richmark Pty Ltd. The report–Bloomfield, Orange – Economic

*Impact Assessment*—is hereafter referred to as "the EIA".

The EIA examines the need for, and impact of, a convenience retail centre

development proposed as part of the overall Bloomfield mixed-use

development site located on the western side of Forest Road opposite the

existing Orange Health Service Precinct.

The proposed centre is planned to include the following retail elements:

➤ Stage I – a small supermarket (1,649m²), one mini-major tenant

(416m<sup>2</sup>) and specialty space (845m<sup>2</sup>). The assumed first full year of

operation of the proposed development is 2020-21; and

**Stage 2** – expansion of the supermarket to 3,000m<sup>2</sup>, an additional

mini-major tenant of 936m<sup>2</sup> and a further 856m<sup>2</sup> of specialty

floorspace. The expanded centre is assumed to be operational by

2024-25.

The EIA report states that the proposed Stage 2 supermarket expansion will

absorb some of the specialty floorspace developed in Stage I meaning that

the overall centre will contain approximately 4,800m<sup>2</sup> once stage 2 is

Advice to Orange City Council ~ Review of EIA for Proposed Bloomfield Retail Centre February 2019

completed. This would make the proposed centre almost the same size as

the existing North Orange centre.

Context

At present there are effectively no retail services in South Orange. The

nearest retail facilities to the subject development site are those in the

Orange CBD.

The Planning Scheme does make provision for a B2 Neighbourhood

Centre on land immediately to the south of the subject site. This land is

currently occupied by an agricultural research centre operated by the

Department of Primary Industry (DPI). The extent of retail facilities possible

on the DPI site is limited to approximately 1,400m<sup>2</sup>, however.

Provision also has been made in the Shiralee Village Master Plan for retail

facilities at some future time. We understand these facilities probably will

be minor in nature and are unlikely to be developed within the next five

years.

To the south of Bloomfield the nearest retail facilities are those in the

township of Blayney. These facilities are anchored by a Bernardis

supermarket of some 2,500m<sup>2</sup>.

Advice to Orange City Council ~ Review of EIA for Proposed Bloomfield Retail Centre

February 2019

EIA Methodology and Assumptions

Overview

The EIA has adopted a generally sound methodology which follows

accepted principles for establishing economic need and evaluating

economic impact. That said, we have some specific comments on the

analysis presented in the EIA and these are discussed below.

Trade Area

The trade area is depicted in Map 2.1 (EIA page 13 refers). The trade area

defined by Location IQ includes a Secondary North sector much of which

is considerably closer to the CBD than it is to the subject site. Accordingly,

it is to be expected that the volume of retail spending likely to be captured

by the proposed centre from the Secondary North will be relatively

constrained.

Based on our experience we consider it is much more likely that

Secondary North residents will travel 'inwards' toward the Orange CBD in

order to access retail facilities rather than travel 'outwards' to the proposed

centre at Bloomfield.

Population Growth

As set out in Table 2.1 (EIA page 15 refers) the Main Trade Area (MTA; that

is Primary plus Secondary trade areas) is estimated to have had a

Advice to Orange City Council ~ Review of EIA for Proposed Bloomfield Retail Centre

February 2019

population of 17,440 people in 2018 of which only 5,510 (31.6%) were

residents of the Primary trade area.

The significance of the Secondary North to the overall analysis presented

in the EIA can be seen in that its estimated 2018 population of 6,890

accounted for approximately 40% of the MTA's total population at that

time.

The analysis of future population growth set out in the EIA, particularly that

for the Primary trade area, is dependent on the rate of residential

development in the Shiralee area as well as the assumed development of

550 dwellings on the DPI land commencing in 2020.

The EIA population projection assumes the development of 30 to 35

dwellings per annum in the PTA between 2016-21 increasing to around 85

dwellings per annum between 2021-31.

If residential development in the Shiralee release area is delayed due to

overall economic conditions and land assembly issues, and if the DPI land

is not developed for residential purposes, then demand for retail

floorspace in the Bloomfield trade area will be slower to emerge than that

forecast by Location IQ in their EIA.

Advice to Orange City Council ~ Review of EIA for Proposed Bloomfield Retail Centre February 2019

Viability of Proposed Development

The EIA estimates the proposed Stage I centre will achieve total annual

sales of \$16.2 million in 2020-21 (\$2017-18).

The proposed supermarket is forecast to achieve an average sales rate of

\$6,567 per m<sup>2</sup> per annum, the mini-major \$3,700 per m<sup>2</sup> per annum and

the retail specialties \$5,525 per m<sup>2</sup> per annum.

The overall average sales rate for the centre as a whole is estimated to be

some \$5,872 per m<sup>2</sup> per annum in 2020-21.

These are relatively low average sales rates for a small centre with a

supermarket major as its anchor. For instance, industry publication

Shopping Centre News (SCN) in its 2018 'Mini Guns Survey' found small

Australian centres anchored by a full-line supermarket achieved average

sales rates ranging between \$4,569 per m<sup>2</sup> per annum and \$17,777 per

m<sup>2</sup> per annum. The median sales rate for such centres was \$9,126 per m<sup>2</sup>

per annum (\$2018).

Of the 151 small centres surveyed by SCN in Australia only 8.6% (13) had

average sales rates less than \$6,000 per m<sup>2</sup> per annum in 2018.

It could be argued that the below average turnover estimated by Location

IQ is due to the proposed Stage 1 centre not containing a full-line

Advice to Orange City Council ~ Review of EIA for Proposed Bloomfield Retail Centre

February 2019

supermarket and/or that the centre will not be surrounded by a dense

residential catchment. Alternatively, the below average sales forecast

identified in the EIA may indicate the proposed development is premature.

That said, viability of the proposed centre ultimately is an issue for the

proponent and is not in and of itself a reason for refusal of the

development.

Impact Analysis

The impact analysis presented in the EIA relates only to the Stage I of the

proposed development which is assumed to commence trading in

2020-21.

The Stage 1 impact on the Orange CBD's sales is estimated to be in the

order of -3.2%. The estimated impact on Blayney is also estimated to be

-3.2%. The impact on other centres such as North Orange is estimated to

be less than -1% in 2021.

We generally agree that the impacts of the Stage I development are likely

to be of the order identified in the EIA. Impacts of this scale are classified

as being in the 'very low' category of impact. As such the proposed

development appears unlikely to detrimentally impact the trading

performance of the centres affected.

Advice to Orange City Council ~ Review of EIA for Proposed Bloomfield Retail Centre

February 2019

We note, however, that the EIA is generally silent regarding the potential

impact of Stage 1 on any retail development which may occur in the B2

Neighbourhood Centre zone on the DPI land immediately to the south of

the subject site.

In our opinion, this is the most important issue for Council to consider

given the reasonable expectation that the New South Wales Government

may anticipate that a retail/commercial centre will be developed on the

DPI land at some future time.

In our opinion, if a supermarket is developed on the subject site as part of

Stage I it is unlikely that a centre on the DPI land could also attract a

supermarket tenant. This would mean that any development of the B2

Neighbourhood Centre land on the DPI site would, in all likelihood, be

limited to small-scale retail and commercial services and hence it would

always play a secondary role to the proposed centre at Bloomfield.

As noted above, the EIA also foreshadows a second stage of development

at Bloomfield by 2024-25. Specifically EIA Section 5.1 v (EIA page 48

refers) states that:

"A full line supermarket of 3,000 m² would likely be

supportable by 2024/25 when the primary sector population

is projected to reach around 7,000."

Advice to Orange City Council ~ Review of EIA for Proposed Bloomfield Retail Centre

February 2019

It is generally accepted that a population of 8,000-10,000 people is

required to support a full-line supermarket in urban areas of Australia. In

this instance, a Primary sector population of 7,000 residents together with

demand generated by workers in the Bloomfield precinct and the capture

of some 'passing trade' from those travelling along Forest Road between

Orange and the Secondary South sector probably would be sufficient to

support such a store.

In our view, if Council is minded to support the proposed development at

Bloomfield, a condition should be attached to any such approval which

effectively links the approval of Stage 2 to the prior achievement of a

Primary sector residential population of at least 7,000 people.

In this regard, the 2021 Census-which will produce data in late 2022 and

early 2023-should provide valuable guidance as to whether this

population threshold will be achieved by 2024-25 as forecast by

Location IQ.

If such a condition does not form part of any approval of the proposed

development then there is a risk that a full-line supermarket could be

developed on the site before there is sufficient population in the

immediate catchment to support such a store. Such an outcome could be

expected to have a detrimental impact on the performance of

supermarkets in the Orange CBD.

Advice to Orange City Council ~ Review of EIA for Proposed Bloomfield Retail Centre

February 2019

Summary

Over the longer term a need will emerge in South Orange for a convenience-type

centre containing a supermarket. Further population growth in the catchment will

be required to justify the provision of a full-line supermarket (that is, one in

excess of 3,000m<sup>2</sup> net leasable area), however.

We consider the subject site has some clear locational advantages over the

existing B2 Neighbourhood Centre site on the DPI land. These flow from its

better spatial relationship to both existing and proposed major employment and

activity generators in the area such as the Orange Health Service precinct, the

existing aged housing facility and proposed future private medical and

'medi-hotel' facilities.

Advice to Orange City Council ~ Review of EIA for Proposed Bloomfield Retail Centre February 2019