

8 December 2017

The Director  
Employment Policy and Systems  
GPO Box 39  
SYDNEY NSW 2001

Dear Sir/Madam;

**Submission: Proposed Amendment to The Bulky Goods Premises Definition**

On behalf of our client, Harvey Norman Pty Ltd, we thank the Department of Planning and Environment (Department) for the opportunity to comment on the proposed amended to the Standard Instrument (Local Environment Plans) Order 2006, with regards to the proposed amendment to the definition of bulky goods premises.

We understand, as recommended by the Retail Expert Advisory Committee (REAC), the Department will be undertaking a broader review of large format retailing as part of the preparation of a State-wide retail policy. With this in mind and whilst the initiative to review and broaden the definition is generally supported, we do suggest that it would be more appropriate to amend the definition of bulky goods premises in conjunction with that REAC review and not separate to. Doing so, would ensure that the revision to the definition forms part of a wider integrated review of retailing and bulky goods.

Notwithstanding the above, we support in general the review and amendment of the bulky goods definition to better suit the nature of these premises and provide below our comments on the draft amendment.

Our client supports the proposed amendment's removal of the requirement to contain a large area for the display or storage of goods. This will provide the opportunity for our client, and other bulky goods retailers, to establish smaller stores with more flexible layouts better suited to infill locations.

However, as acknowledged by the amendment overview document, the nature of retail is changing due to the rise of online shopping. As a result the range of goods included in the bulky goods definition should also be amended to ensure these businesses can remain profitable and competitive.

Similar to the amendment to the Victorian planning system in January 2012 (Planning Scheme Amendment VC88), we recommend that for the purposes of clarity and certainty, the definition should be expanded to include the following additional goods:

- 'outdoor and recreation goods' in addition to camping equipment;
- all 'animal supplies' (ie not just equestrian goods and including pet supplies);
- baby and children's goods, children's play equipment and accessories; and
- sporting, cycling, leisure, fitness goods and accessories.

This broader range of goods will provide further opportunities for the growth of smaller bulky goods premises and for existing premises to stock a wider range of products.

Furthermore, we suggest the land use of a café/restaurant should also be included as a specific use ancillary to bulky goods premises. This will enable bulky goods premises to offer a better customer experience, meet customers' needs, and increase customer visitation to bulky goods centres. All this

will further protect and enhance bulky goods premises in surviving the declining need to visit bulky goods premises due to online shopping.

On behalf of our client, we appreciate the opportunity to work together with the Department in delivering the best planning outcomes for bulky goods retailing and happy to discuss.

Kind regards



Mark Grayson

Director  
Knight Frank Town Planning