

12<sup>th</sup> December 2017

NSW Department of Planning  
The Director of Employment Policy and Systems  
Proposed Standard Instrument LEP  
GPO Box 39,  
Sydney NSW 2001.

Lodgement by mail and Department of Planning Website

Dear Sir / Madam,

**Proposed Standard Instrument Local Environmental Plan (PSILEP) Amendment – Bulky Goods Premises Definition**

*About AMP Capital Real Estate*

AMP Capital Real Estate is a leading institutional investment house with approximately \$25 Billion of shopping centres, commercial and industrial property assets under its management across Australia, simultaneously providing sustained returns for its investors, as well as providing a strong focus for employment and support for the economy of NSW more broadly.

Within NSW alone, AMP Capital manages and holds interests in over \$3 Billion of Shopping Centres with a combined footprint of over 500,000 square metres (or over 100 standard football pitches) including:

- The Macquarie Centre and Westfield Warringah Mall (Super-regional);
- Westfield Liverpool (Regional);
- Marrickville Metro, Royal Randwick, Northbridge Plaza, Dapto Mall, Marketown Shopping Centre and Casula Mall (Sub-regional); as well as a
- The Crossroads Homemaker Centre (bulky goods).

Invariably, these centres have grown and developed overtime to meet the needs of the local community through the sustained investment of private capital resulting in their establishment as places of social interaction, employment, learning and business.

Sustained private investment in these Centres has also contributed to the improvement of local community infrastructure through development contributions including development in-kind (eg the creation of community centres, civic spaces, libraries, etc), mandatory Section 94's contributions and more recently, through the use of Voluntary Planning Agreements.

An example of AMP Capital Real Estate's approach to the long-term management and investment in real estate assets is the Macquarie Shopping Centre. First developed by AMP in the 1980's, it has been re-developed over the ensuing decades to become one of the nation's top retail destinations, simultaneously providing sustained returns for its superannuation fund investors, as well as providing a strong focus for employment and the economy. Now, almost 40 years later, it is an established place for social interaction, employment, learning and business and is an essential component of Sydney's second largest business district supporting Sydney's Global Arc.

### *Retail Expert Advisory Committee*

In 2016, the NSW Government appointed an independent committee, the Retail Expert Advisory Committee (REAC), to inquire into and provide advice on appropriate reforms to improve the NSW planning system for retailing.

The REAC Independent Report has made five recommendations to the NSW Government, in some cases representing significant departures from the NSW Centres SEPP, on how the planning system can be improved to support retail in NSW, including:

- Develop a state-wide retail planning policy,
- Consider retail supply and demand in strategic plans,
- Change the Standard Instrument Local Environmental Plan,
- Improve assessment processes, and
- Provide clearer planning guidance.

In a move that surprised the owners of retail property in NSW, the NSW Minister for Planning, unilaterally accepted the five recommendations in the REAC Independent Recommendations Report on the 17<sup>th</sup> October 2017<sup>1</sup>.

### *PSILEP Bulky Goods*

The PSILEP (Bulky Goods Premises Definition November 2017) is but one of a package of five reforms that the Department and the Minister for Planning will introduce to NSW that proposes to alter existing NSW retail planning policies.

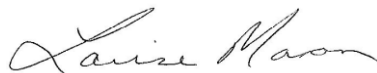
Whilst the PSILEP addresses an oversight in the former Standard Instrument, accepting this amendment, in isolation, and ahead of the release of the other four reforms, may result in unintended consequences to what might otherwise appear to be a benign proposal.

AMP Capital Real Estate is of the view that the Department of Planning (DoP) release the complete retail policy reform package for exhibition and comment so that all stakeholders can comprehensively assess the total and cumulative effects of the proposed reforms from their own perspectives.

<b>Recommendation:</b>	That the Department of Planning and the Minister for Planning not accept the PSILEP Bulky Goods amendment wording ahead of a broader community consultation on the complete package of retail policy reforms and their cumulative changes to current policy.
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Should you require additional information in relation to this submission please do not hesitate to contact me on 02 9257 1801 or Lino Caccavo on 0411 660 007 or [lino.caccavo@ampcapital.com](mailto:lino.caccavo@ampcapital.com).

Yours sincerely



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<sup>1</sup> <http://www.planning.nsw.gov.au/Policy-and-Legislation/Retail-planning/Independent-Retail-Expert-Advisory-Committee>