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12 December 2017



Director Employment Policy and Systems
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

PROPOSED AMENDMENT TO THE DEFINITION OF BULKY GOODS PREMISES – DUBBO REGIONAL COUNCIL SUBMISSION

Council welcomes the opportunity to provide its input and perspectives in respect of the proposed amendment to the definition of bulky goods premises within the Standard Instrument (Local Environmental Plan) Order 2006.

It is understood that the intent of the amendment is to adapt the definition to better facilitate the evolution of retail development within the legislative framework noting that advancements in technology and online retailing is changing the way in which people shop.

Primarily, it would appear that the proposed change would allow bulky goods retailers to occupy space within shopping centres as a showroom and have goods delivered from offsite warehouse and distribution centres. In addition, it appears that the retail industry have raised concerns in respect of the provision of loading facilities for public access as being cost prohibitive.

Council has not received any representations in respect of the current definition of bulky goods premises in the Dubbo Regional Council Local Government Area. In addition, Council has not had any proposals to occupy shopping centres for this use. It is considered Council's long term strategic planning has provided a number of specialised areas throughout the city for the purposes of bulky goods retailing, which now provide significant opportunities for bulky goods retailing.

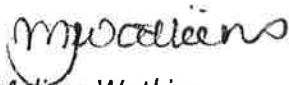
In respect of the proposed amendments to the bulky goods definition, it is unclear as to how the provision of direct vehicular access for public loading is cost prohibitive. Typically bulky goods premises require loading and unloading facilities in order for the goods to be delivered to the premises. In Council's experience the public typically use the same loading facilities thereby not having the expense of providing a secondary facility.

Noting the above, it is considered that the proposed amendment to the bulky goods premises definition is not required.

However, given that the bulky goods retail landscape is changing to allow retailers the opportunity to provide showroom style development within shopping centres, distinct from the typical bulky goods premises, it is considered that the Department of Planning and Environment could provide a new definition of 'large format retail premises'. This would allow Council to distinguish between the two formats in the land use table, protect the integrity of the Standard Instrument and provide better flexibility for the business community.

Council appreciates the opportunity to provide these comments in respect of the proposed changes to the definition of bulky goods retail. If you require any information regarding this submission, please do not hesitate to contact Council's Manager Strategic Planning Services, Steven Jennings, on (02) 6801 4000.

Yours faithfully



Melissa Watkins
Director Planning and Environment

Please be advised that the Dubbo Civic Administration Building and Wellington Administration Building will close for business at 3.00 pm on Friday 22 December 2017 and reopen at 9.00 am Tuesday 2 January 2018.