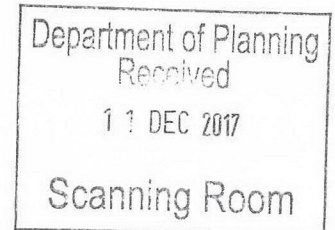


PCU073273

File no: F15/1234
C17/56978

1 December 2017

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



Dear Sir,

Objection – Proposed changes to ‘bulky goods premises’ definition

Thank you for the opportunity to comment on the proposed changes to the bulky goods premises (BGP) definition. We wish to take this opportunity to express our strong objection to the proposal.

We support the Department’s plans to review large format retailing and to prepare a State-wide retail policy to reflect current market conditions. We agree that there needs to be adequate planning controls in place to provide for the unique needs of BGR and other types of large format retail. This is particularly important in places like Blacktown City where they make such a significant contribution to the local economy.

Changing the BGR definition is likely to have a significant and widespread impact. Therefore, we consider it prudent that the current definition is maintained until after the review of large format retail when there is likely to be a stronger evidence base to inform such a decision.

One of our major concerns is that the proposed new definition essentially seeks to revert back to the pre-Standard Instrument LEP definition, removing the current 2-part test and failing to differentiate BGPs from other forms of retail. We consider this to be a considerable backward step that will most likely create a considerable amount of confusion and uncertainty among professional planning staff, applicants and the general public. In our experience, if BGPs are not clearly defined, applicants will take advantage of the situation and claim to be BGP in some areas and not in others, depending on what suits them.

We are also concerned about the impact the proposed definition will have on the viability of Blacktown's existing retail stores, shopping malls and strategic centres. If stores are no longer required to provide a large area for handling, display and storage – the defining features of bulky goods stores and the only things that set them apart from other general retail stores – then general retail stores will be able to set up in bulky goods centres. This will give a competitive advantage to some retail formats, many of whose retail offer is not actually bulky at all, and result in a situation where traditional shopping centres lose tenants.

Amending the BGP definition to essentially straight retailing is likely to undermine and is inconsistent with the centres hierarchy outlined in the draft Greater Sydney Region Plan and Revised draft District Plans. These State-level strategies promote City Clusters, Strategic Centres and Local Centres as places for retail employment, as well as ideal places to concentrate residential densities and social infrastructure. Spreading retailing across larger areas, away from centres does not achieve these objectives.

BRG differs from general retail forms in many aspects and any revised definition must reflect this. Successful BGR developments require large flat site, good exposure, affordable and sustainable rents, road and loading infrastructure to support large trucks, large areas of car parking, wide regional catchments, co-location with other BGR, and cost efficient design. In our opinion, the best place for BGR is in the B5 Business Development Zone as it is the only zone that enables specialised retail uses that require a large floor area. In Blacktown City, a significant amount of land is zoned B5 which we consider sufficient to support a large number and variety of BGR stores to meet the needs of our community.

Should you wish to discuss this matter further, please contact our Manager Development Policy, Trevor Taylor on 9839 6162.

Yours faithfully,



Kerry Robinson
General Manager