



18 May 2018

Planning & Environment Department  
NSW Government

**SUBMISSION – The Future of Retail Discussion Paper**

Baby Bunting Pty Ltd (**Baby Bunting**) has been a member of the Large Format Retail Association for nine years and now operates 47 stores across Australia and is the largest specialist baby products retailer in the country. Baby Bunting has been severely restricted in establishing new stores in NSW given the limitations imposed by the various Council definitions across the metropolitan area and regional NSW as well as the limitations on the zones within which we can operate.

As such we fully endorse the LFRA's submission to the discussion paper on "Planning For The Future of Retail" currently on exhibition.

We strongly endorse the proposed definition of "Specialised Retail Premises" as this will assist not only Baby Bunting but all LFRA members in certainty for the investment in new stores and therefore job creation. It's critical that we have clarity in the goods that can be sold and the services provided.

However, it is important to note that this change will not increase the supply of land available for large format retailing, only what can be sold in existing approved areas and zones. There is a severe lack of appropriately zoned land in NSW and a first step would be to permit large format retail to operate in Industrial Zones. The impediments to what we can sell and where can sell it makes for a strangulation by red tape leading us and other retailers to focus investment in other states. Clearly not the ideal outcome for the largest state of NSW.

We strongly support the view that all Business Zones are simplified similar to that in Victoria so that large format retailing can operate in a wider range of zones thereby increasing the supply of land.

Should that strategy be adopted state-wide then Baby Bunting will be in a better position to open many more stores in NSW creating a significant number of jobs. Per head of population we have the least number of stores in NSW as compared to all the other states. Clearly we have been able to establish a greater number of stores in other states without the same restrictions experienced in NSW. Investment has therefore been directed elsewhere.

We have in excess of 20 stores to open in NSW on our current network plan on top of the 12 currently trading. This definition provides certainly for the investment in those stores which will generate up to 300 full time, part time and casual positions.

Again we strongly endorse all the recommendations contained in the LFRA'S submission.

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Baby Bunting Pty Ltd