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16 May 2018

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

Dear Sir/Madam,

Blacktown City Council submission on the Planning for the Future of Retail Discussion Paper and proposed amendments to the retail land use definitions

Thank you for the opportunity to comment on the Planning for the Future of Retail Discussion Paper and the proposed amendments to the retail land use definitions.

We generally support a strategic review on the future of retail and a focus on a centres based approach. However, there are aspects of the proposal that we question or do not support.

In particular, we do not support the growth of unplanned retail outside of recognised and defined centres, mandating open zones or establishing retail innovation provisions. We also do not support the proposed definition of 'specialised retail premises'.

Our detailed submission on the discussion paper and the proposed retail land use definitions is included as attachment 1.

If you would like to discuss this matter further, please contact Glen Weekley, Team Leader Strategic Planning, on 9839 6236.

Yours faithfully.

Glennys James

Director Design and Development

IMPORTANT ENGLISH

This letter contains important information. If you do not understand it, please come to Council's Administration Centre and discuss the letter with Council staff who will arrange interpreter services.

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هذه الرسالة تحتوي على معلومات هامة. إذا لم تفهمها، نرجوك الإتصال بمركز إدارة المجلس ومناقشة الرسالة مع موظفي المجلس والذين سيقومون بترتيب خدمات مترجم.

ΠΡΟΣΟΧΗ ΕΛΛΗΝΙΚΑ

Η παρούσα επιστολή περιέχει σημαντικές πληροφορίες. Για τυχόν διευκρινίσεις, παρακαλούμε να προσέλθετε στο Διοικητικό Κέντρο της Δημαρχίας για να συζητήσετε την επιστολή με τους αρμόδιους υπαλλήλους, που θα φροντίσουν να σας παρασχεθούν υπηρεσίες διερμηνέα.

IMPORTANTE ITALIANO

Questa lettera contiene informazioni importanti. Se non la capisci, sei invitato a venire al Centro amministrativo del Municipio per parlare della lettera con gli impiegati del Municipio, i quali organizzeranno i servizi di un interprete.

IMPORTANTE TAGALOG

Ang liham na ito ay naglalaman ng mahalagang impormasyon. Kung ito ay hindi ninyo maintindihan, makipagkita sa empleyado ng Konseho sa Sentro ng Administrasyon ng Konseho (Council's Administration Centre) upang mapagusapan ito. Ang serbisyo sa pagpapaliwanag ay ihahanda para sa iyo.

IMPORTANTE ESPAÑOL

Esta carta contiene información importante. Si usted no la entendiera, le rogamos venir a las oficinas administrativas del municipio (Council's Administration Centre) para tratar la carta con un funcionario municipal, quien se encargará de proporcionarle los servicios de un intérprete.

ÖNEMLİ

Bu mektup önemli bilgiler içerir. Mektubu anlayamazsanız lütfen Belediye'nin Yönetim Merkezi'ne gelip Belediye'nin tercümanlık hizmetlerini ayarlayacak olan görevliler ile görüşünüz.

VAŽNO HRVATSKI

Ovo pismo sadrži važnu informaciju. Ako ga ne razumijete, molimo dodite u administrativni centar Općinskog Odbora i razgovarajte o pismu s općinskim osobljem, koje će se pobrinuti za tumača.

महत्वपूरण हिन्दी

इस पत्र में महत्वपूरण सूचना है। यदि आप इसे न समझ पा रहे हों, तो कृपया ज़िला परिषद (काउंसिल) के प्रशासन केंद्र में आइये और परिषद के कर्मचारियों से इस पत्र के बारे में बात करिए, जो आपके लिए दुआषिया सेवा का प्रबंध करेंगे। IMPORTANTI MALTI

Din I-ittra fiha taghrif importanti. Jekk int ma tistax tifhimha, jekk joghgbok ejja fiċ-Ċentru ta' I-Amministrazzjoni tal-Kunsill biex tiddiskuti I-ittra ma' I-istaff tal-Kunsill u dawn jirrangawlek biex ikollok servizz ta' interpretu.

ВАЖНО СРПСКИ

Ово писмо садржи важне информације. Ако га не разумете, молимо дођите у Административни центар општинског одбора и поразговарајте о писму са општинским особљем, које ће се побринути за тумача.

TĀUA FAA-SAMOA

O lenei tusi o loo iai ni faamatalaga tāua. A e lē malamalama iai, faamolemole susū mai i le Council's Administration Centre ma talatalanoa ai i le aufaigaluega a le Council e ala i se tagata faaliliuupu ua fatulagaina.

QUAN TRỌNG TIỂNG VIỆT

Có những tin tức quan trọng trong bức thư này. Nếu quý vị không hiểu, xin vui lòng đến Trung Tâm Hành Chánh của Hội Đồng và thảo luận lá thư này với nhân viên của Hội Đồng Thành Phố. Nhân viên này sẽ dàn xếp để dịch vụ thông ngôn giúp quý vị.

WAŻNE POLSK

Niniejszy list zawiera ważne informacje. Zgloś się do Ośrodka Administracji Lokalnej (Council's Administration Centre), jeśli go nie rozumiesz i chcesz w tej sprawie porozmawiać. Pracownik administracji zorganizuje thumacza

।ਹੱਤਵਪੁਰਣ ਪੰਜਾਬੀ

ਇਸ ਪਤ੍ਰਿਕਾ ਵਿੱਚ ਮਹਾੱਤਵਪੂਰਣ ਜਾਣਕਾਰੀ ਹੈ। ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦੀ ਸਮਝ ਨਹੀਂ ਆਉਦੀ, ਤਾਂ ਕ੍ਰਿਪਾ ਕਰਕੇ ਕੋਂਸਲ ਦੇ ਐਡਮਿਨਸਟ੍ਰੇਟਿਵ ਸੈਂਟਰ ਆ ਕੇ ਕੋਂਸਲ ਦੇ ਕਿਸੇ ਅਧਿਕਾਰੀ ਨਾਲ ਇਸ ਪਤ੍ਰਿਕਾ ਬਾਰੇ ਗਲਬਾਤ ਕਰੋ ਅਤੇ ਉਹ ਦੁਭਾਸ਼ੀਏ ਦੀ ਸੇਵਾ ਦਾ ਪਬੰਧ ਕਰਨਗੇ।

这封信中包含有重要讯息。若您不理解信中的内容,请 前往市议会管理中心,市议会的员工将会为您安排翻译 人员服务并与您一起探讨信中的内容。

重要! 繁體中文

這封信中包含有重要訊息。若您不理解信中的內容,請 前往市議會管理中心,市議會的員工將會爲您安排翻譯 人員服務並與您一起探討信中的內容。



Blacktown City Council submission

Planning for the future of retail

1. Planning for the Future of Retail: Discussion Paper

a. Direction 1: Better local strategic planning for retail

We generally support a focus on centres by:

- establishing long-term place-based outcomes for retail
- updating local retail strategies
- aligning the strategic narrative and planning controls.

b. Direction 2: A modern approach to retail development that reflects a range of retail formats in centres

We support a focus on retail activity being located within a defined hierarchy of centres across the City. This enables focused investment in supporting infrastructure and the promotion of higher density mixed use residential environments. We do not support the growth of unplanned retail outside of recognised and defined centres.

Clusters of out-of-centre retailing are generally not supported by public transport, social infrastructure, higher density housing, investment in the public domain, nor have the activation and vibrancy that we plan to achieve in identified centres. Any such recognition would detract from planned growth, investment and impact of the viability of identified centres. We therefore strongly oppose the recognition of large-format retail clusters as centres.

c. Direction 3: Adaptability and certainty for retail

We do not support the direction of creating open zones or establishing a retail innovation provision to allow undefined or prohibited land uses to be potentially permitted. Applying a universal approach is completely contrary to the strategic place-based approach that is promoted in Direction 1.

We are concerned that we could not implement our strategic place-based intent for a centre through the use of a universal open zoning approach. The current system of 'closed zoning' allows us to apply the most appropriate land use zone and determine land uses that meet our strategic intent. There is not enough detail in the Discussion Paper to determine the implications of such an approach.

An open zone approach would lead to developers focusing on land uses that create the greatest yield return, as opposed to creating the best place-based outcome for a centre. The result could lead to a greater focus on residential development in our centres that could limit the ability for retail uses to operate. Whilst we are not

opposed to residential development, it needs to be balanced in a mixed use environment, to ensure that centres have the right land use mix to enable them to function and not be dominated by a single use, especially along main streets that we are trying to activate. Furthermore, an open zone enables completely inappropriate land uses to be located in a centre, which again could undermine the local place-based intent for the centre.

4. Amendments to retail land use definitions

a. New land use definition for 'artisan premises'

We generally have no objection to the proposed new land use definition of 'artisan premises'. We do however question the need for the definition given the existing definitions of 'light industry' and 'food and drink premises'. We also don't support it being a mandated use in the IN1, IN2, B5, B6 or B7 zones.

'Artisan premises' may be suitable in inner city locations where IN1, IN2, B5, B6 or B7 land use zones are often in walking distance to neighbouring residential areas or form part of large renewal projects. However, in Western Sydney industrial zones are located considerable distance from residential areas, centres and public transport. They are car and truck dependent given the nature of industrial activity being conducted in these locations.

We believe that 'artisan premises' would be appropriate in many of our centres (B1, B2, B3 and B4 zones) where we already permit 'food and drink premises' and other forms of retail. They could well be that new use that could activate or regenerate many smaller underutilised centres throughout Sydney that are struggling to compete with larger supermarkets and shopping centres.

Whilst we don't object to the use, we question the need for a further definition, particularly when the whole concept of investigating the retail sector is to reduce complexity. Adding new definitions increases the complexity in the planning system and is contrary to the whole objective of the Discussion Paper.

We believe that the proposed definition of 'artisan premises' is already covered under the existing definitions in the Standard Instrument LEP. The existing definition of 'light industry' is the carrying out of an 'industrial activity', which includes 'production' and 'processing' of 'goods, substances, food, products'. The existing definition of 'industrial retail outlet' enables the 'display or sale' of the goods manufactured on site. Similarly, the existing definition of 'retail premises' is broad enough to cover the selling of items, and includes 'cellar door premises' and 'food and drink premises'.

b. Amended land use definition of 'garden centre'

We are not opposed to the amended definition of 'garden centre'.

c. New land use definition of 'local distribution premises'

The size, location and operation of a 'warehouse or distribution centre' is determined by a number of factors, such as the availability of land and floor space, and

development costs, as well as truck accessibility and the location of markets that they are serving.

We therefore don't believe a new definition that proposes to focus on 'local' distribution is necessary as it will have no effect on the number or location of new warehouse or distribution centres.

Furthermore, the wording in the proposed new definition is unclear, impractical and unenforceable as there is limited ability to differentiate between a 'warehouse or distribution centre' that services a 'local' market as opposed to a broader market.

d. New land use definition of 'neighbourhood supermarket'

Similar to 'local distribution premises', we don't believe that a new definition of 'neighbourhood supermarket' is warranted. The size, location and operation of a 'shop' is determined by a number of factors, such as the availability of land and floor space, costs, accessibility and the catchment that they are serving. The existing definition of a 'shop', without any floor space restrictions, sufficiently covers the intended use in the B1 zone.

e. Replace the land use definition of 'bulky goods premises' with 'specialised retail premises'

We strongly object to the proposed new definition of 'specialised retail premises'. We feel that the definition will negatively impact on the viability of existing and planned centres, and is contrary to the principles outlined in the Greater Sydney Region Plan and the District Plans.

In particular, the inclusion of food, clothing and footwear as part of one of the listed categories of retailing enables uses to operate in locations away from a centre. For example, the definition would enable a department store (eg. Myer, David Jones, Kmart, Target or Big W) to be permissible in an out-of-centre location as they sell household appliances, party supplies, baby and children's goods, as well as food, clothing and footwear.

We do not associate the concentration of 'bulky goods premises' ('specialised retail premises') with traditional town centres focused on place-based planning outcomes. Town centres are places where we want higher density residential, retail, commercial and business activity, town plazas and community facilities, and are generally serviced by public transport. We need to protect our existing and planned centres from the unplanned concentrations of 'bulky goods premises' that undermines their viability.

We do not support the simplifying of the definition as it broadens its application substantially, to the detriment of real town centres.

