

18 May 2018

The Director
Employment Policy & Systems
GPO Box 39
Sydney NSW 2001

PLANNING FOR THE FUTURE OF RETAIL
Discussion Paper – April 2018

To whom it may concern,

We are pleased to provide our response to the 'Planning for the Future of Retail' discussion paper as prepared by the NSW Department of Planning and Environment in April 2018 and currently on public notice.

Established in 1984 and with 145 stores currently operating across Australia, Adairs is one of Australia's leading large format retailers in the sale of Manchester, Furniture and Homewares. Adairs have 36 stores operating in NSW and are retail members of the Large Format Retailers Association (LFRA), which includes other retailers operating in the same market sector such as Spotlight, Pillow Talk, and Freedom.

In conjunction with this matter, Adairs has also made a submission to the Proposed Amendments to the Standard Instrument LEP. In this submission we provided our strong support for the proposed change to the definition of 'bulky goods premises' to be replaced by a new definition of the land use term – 'specialised retail premises'. We also supported the four separate key amendments proposed in that project.

We have undertaken a review of the background report – 'Planning for the Future of Retail' and make the following comments –

Direction 1 – Better local strategic planning for retail.

Adairs support the principles identified in Direction 1. Our key interest is to ensure that the NSW planning framework can deliver an increased supply of suitably zoned land to cater for development of all formats in the retail sector. There is a shortage of supply of land for retail uses in NSW and this has held back the growth of our business particularly over the past 5 years. Local councils need to plan ahead for land to be appropriately zoned for retail and other commercial development. The State Government needs to provide clear direction to local councils on how this work should be undertaken and be clear on the outcomes sought by this process.

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

Adairs support the principles identified in Direction 2. The planning framework needs to be focused on the fact that there are various types of retail formats and types of centres and this is not limited to the common understanding of a major supermarket and department store anchored shopping centre. If a 'centres' policy is intended to be the platform for planning all retail development, then the planning framework needs to be clear in its language to encourage development in the appropriate zone and location. The failings of 'centres' policy in the past has been to constrain development by creating artificial barriers such as prohibiting out-of-centre development. This is a very important issue for the large format retail industry as much of property built to accommodate our businesses are in out-of-centre locations.

Direction 3 – Adaptability and certainty for retail.

In response to Direction 3, we suggest that the current suite of commercial and industrial zones in the standard instrument LEP should be reviewed to make large format retail uses permissible in more zones than it currently is. The current state of play where 'bulky goods premises' is mandated as permissible only in the Enterprise Corridor zone is totally inadequate. On other specific issues raised in this section we support the proposal to create flexible 'open' zones. We would encourage the NSW Government to review the zoning reform undertaken in Victoria in 2013/14 as a guide to standardising zones and providing increased opportunities for retail development. We also support the concept of an "innovation in retail" provision that can allow for uses that aren't defined or contemplated by the current planning regulations.

We thank you for the opportunity to provide our response to this project.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Cherubino', with a long horizontal line extending to the right.

Michael Cherubino
Finance Director
Adairs Retail Group Pty Ltd