

PSA Ref: 4339

18 May 2018

Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attention: Director, Employment Policy and Systems

Dear Sir/Madam,

SUBMISSION ON PLANNING FOR THE FUTURE OF RETAIL DISCUSSION PAPER

Planning Solutions is a specialised town planning practice, providing expert advice and representation in all aspects of urban and regional planning. While based in Western Australia, Planning Solutions undertakes projects for clients across Australia. We represent numerous commercial and Large Format Retail clients operating across the country, including retailers, developers and landowners.

Planning Solutions is an associate member of the Large Format Retail Association (**LFRA**), and actively advocates for improvements to planning regimes (both in WA and interstate) to achieve greater clarity, consistency and certainty for our clients and the Large Format Retail industry more generally.

We thank you for the opportunity to make a submission on the 'Planning for the Future of Retail' discussion paper, and in this regard, offer the following comments and recommendations for your consideration:

1. The Large Format Retail sector accounts for more than \$68.2 billion or 22.2% of all retail sales in Australia. It is a significant contributor to economic growth and employment, with more than 437,000 people (FTE) employed both directly and indirectly by the industry.
2. Demand and supply of Large Format Retail floorspace is significant across the country, including NSW. We understand that it is responsible for some 40% of retail floor space demand in the Sydney Metropolitan Area.
3. In our experience, both in WA and interstate, Large Format Retail is not adequately addressed in planning regimes and policy frameworks. This leads to significant issues for retailers, developers and landowners, both in terms of what can be sold in Large Format Retail premises and where these premises can be located.

4. While the proposed definition of '*Specialised Retail Premises*' is supported (and addressed in a separate submission from Planning Solutions), this needs to be complemented by appropriate zoning and permissibility arrangements. Retailers, developers and landowners not only need to know what can be sold in '*Specialised Retail Premises*', they also require access to appropriately zoned and located land to conduct their business.
5. In our experience, confusing and inconsistent zoning and land use permissibility arrangements present significant barriers to the growth and development of Large Format Retail premises. Planning reform to streamline and simplify zoning arrangements is essential and must maximise the permissibility of Large Format Retailing across the broadest possible range of zones to increase land supply.
6. Such issues are not unique to NSW, and are also commonly experienced in WA. Ongoing planning reforms in WA are seeking to simplify what is a highly fragmented and complex range of zoning and land use controls, to improve clarity, consistency and certainty not only for the Large Format Retail industry, but the community in general. We strongly encourage the NSW Government to move in the same direction by simplifying and expanding the range of business and industrial zones that Large Format Retailers can operate within.
7. In addition to the points made above, Planning Solutions also strongly endorses the LFRA's submission on the 'Planning for the Future of Retail' discussion paper.

Should you have any queries or require further clarification in regard to the above matter please do not hesitate to contact the undersigned.

Yours faithfully



SCOTT VINCENT
ASSOCIATE