

18 May 2018

Director

Employment Policy & Systems
GPO Box 39
Sydney NSW 2001

Planning for the Future of Retail Submission

Richard O'Brien and Associates have reviewed the *Planning for the Future of Retail discussion paper (April 2018)* prepared by the NSW Government, and provide this submission in response.

Richard O'Brien (ROB) is a real estate agency and property consulting firm with more than 25 years' experience in Australia. We have been working in New South Wales for the past 15 years and regularly represent large format retail tenants for occupancy of their premises as well as for landlords of homemaker centres. We strongly believe that the planning system in NSW needs major reform, particularly in relation to planning for the large format sector.

We have undertaken a review of the discussion paper – '*Planning for the Future of Retail*' and provide the following responses;

We agree with the objectives identified in **Direction 1, Better Local Strategic Planning for Retail**. It is most important that planning provides a framework to encourage and guide development to cater for the retail sector. There is a short supply of land for retail uses in NSW and this needs to be addressed by the creation of new supply. The planning system needs to be reformed to facilitate and encourage development.

We agree with the principles contained within **Direction 2, A Modern Approach to Retail Development that Reflects a Range of Retail Formats in Centres**. It is important to plan for the different types of centres and range of retail formats. If the planning framework is to continue to adopt a 'centres' policy to guide retail development, it is very important that it policy doesn't prohibit or place unnecessary constraints on development outside of centres. A large portion of large format retail property is located on main road corridors and generally in locations outside of major activity centres. It must also be recognised that large format centres are primarily accessed by car and not public transport hence their physical characteristics are different from traditional supermarket and department store-based shopping centres.

We believe that a review of industrial land in NSW is also required and that industrial land should be rezoned where appropriate to increase the future availability of land for retail development.

In relation to **Direction 3, Adaptability and Certainty for Retail**, we believe that a review is required as there are too many zones in the standard instrument that are too similar. There is a need to reform the zoning framework to reduce, consolidate and standardise the number of zones and to make more land uses permissible within those zones. Victoria undertook a similar zoning reform project approximately 5 years ago and the industry has responded very positively to these changes since they were implemented.

We strongly believe that there is an immediate need to make bulky goods premises (or specialised retail premises) a permissible use in more zones within the existing zoning framework in the Standard Instrument LEP.

We support the direction to create flexible 'open' zones to remove the prohibition on retail that currently exists in many zones. We also support the development of an "innovation in retail" provision.

Thank you for the opportunity to provide a submission in response to this discussion paper.

Yours Faithfully



Richard O'Brien

Director

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