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Director
Planning Reform
NSW Department of Planning, Industry and Environment
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Proposed Employment Zones Framework NSW Department of Planning, Industry and Environment

This submission has been prepared by Harris Scarfe Home (**HSH**) in response to the Proposed Employment Zones Framework prepared by the NSW Department of Planning, Industry and Environment issued for public consultation during May 2021.

HSH is a private Australian company owned and operated as part of the broader Spotlight Retail Group (SRG). HSH is a large format retailer of homewares; electrical goods; bedding and manchester which in NSW is categorized under the land use definition of 'specialised retail premises'. We currently operate 47 retail outlets in Australia with 7 located in NSW. HSH has a strategic plan to substantially grow the network of stores with approximately 46 new outlets planned in NSW over the next 5 years.

HSH is a member of the Large Format Retail Association (LFRA) and supports the submission by the LFRA in relation to this project. We have separately reviewed the Proposed Employment Zones Framework and provide our response as follows:

1. We support the new planning framework to create a reduced number of "employment zones". However, it is important to have a clear strategic intent for each of those zones and clear position on which retail uses are encouraged to be located within those zones. Therefore, we recommend changes to the drafting which we discuss in point 3 below.
2. We support the E3 Productivity Support Zone as the main zone where "specialised retail premises" should be located. We believe this approach to zoning will increase the supply of land for development and assist us to deliver on our planned investment in growing our store network.
3. We are concerned that the objectives contained in the draft Standard Instrument Zone E3 are not clearly drafted and require changes as follows -
 - a. In Section 1 Objectives dot point 3 – "To provide for land uses that are compatible with, but do not compete with, land uses in surrounding local and commercial centres." This is negative and confusing language which doesn't align with the intention of creating opportunities for the retail sector. We believe this objective should be deleted.
 - b. In Section 1 the final dot point – "To enable limited retail uses to meet the day to day needs of workers or to sell goods of a large size weight or quantity or goods manufactured on site". This statement is again drafted in a negative and confusing tone that seeks to limit and sub-categorize retail. We understand that the E3 zone is intended to be the zone where "specialised retail premises" is planned to locate and hence there must be a clear objective to provide clarity to achieve that outcome. The objective needs to be completely re-drafted to achieve this outcome. In summary we believe the objective as currently drafted should be deleted and re-drafted.

We thank you for the opportunity to provide a submission and welcome the opportunities to provide our views on future planning reform issues.

Yours sincerely,



Graham Dean
Chief Executive Officer

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