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Director
Planning Reform
NSW Department of Planning, Industry and Environment
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**Proposed Employment Zones Framework, Position Paper and Draft Standard Instrument
NSW Department of Planning, Industry and Environment
Submission in Response**

This submission has been prepared by Anaconda in response to the Proposed Employment Zones Framework, Position Paper and Draft Standard Instrument (Local Environmental Plans) Amendment (Land Use Zones) Order 2021 as prepared by the NSW Department of Planning, Industry and Environment issued for public consultation in May 2021.

Anaconda is one of Australia's leading large format retailers in the outdoor adventure products sector with 69 stores currently operating across Australia. Anaconda is also a retail member of the Large Format Retailers Association (LFRA) which includes other retailers operating in the same market sector such as BCF and Macpac. In New South Wales, Anaconda has 17 operating outlets.

Anaconda has reviewed the Proposed Employment Zones Framework. We are generally supportive of the proposal to reform employment zones and the introduction of the E3 Productivity Support Zone as the primary location for "specialized retail premises" subject to revision of the objectives to the E3 zone as explained below.

Our response to the proposal is below:

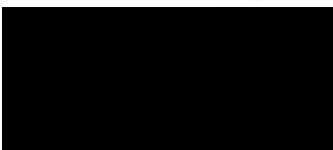
1. We support the new framework of zones to create a reduced number of broader "employment zones". Each zone should have a clear strategic intent and guidance on the retail uses within the zones.
2. We support the creation of the E3 Productivity Support Zone as the primary zone where "specialised retail premises" are encouraged to locate. Furthermore, specialised retail premises must be mandated as a permissible use in the E3 zone. The consolidation of the existing B5, B6 and B7 zones into the new E3 zone will facilitate a substantial increase in sites available for the Anaconda store network to expand in NSW which in turn will enable us to deliver on our planned store network expansion and investment in capital works and ongoing retail employment.
3. The proposed objectives of the E3 zone are worded in a manner that could adversely affect our ability to expand our store network:
 - a. Third dot point reads – "To provide for land uses that are compatible with, but do compete with, land uses in surrounding local and commercial centres." This statement contains 'anti-competitive' sentiment and is inconsistent with objectives to support employment generation and economic sustainability. This objective does not help clarify the objectives of the E3 zone and we believe it should be deleted outright.
 - b. Final dot point reads – "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 overly negative and seeks to restrict retail rather than encourage it. It also reuses part of the redundant land use definition of 'bulky goods premises' which reinforces the sentiment seeking to restrict retail. As a result, the objective reads as confusing and unhelpful in defining the objectives of the zone. If the E3 zone is intended to be the principal zone where "specialised retail premises" is encouraged to locate there must be a clear

objective in the zone to direct that outcome. We believe the objective as drafted should be deleted and replaced with words to the effect of – “To provide for retail uses including specialised retail premises; building and hardware supplies; neighbourhood shops and food and beverage uses.”

In summary, Anaconda supports the proposed employment zones and in particular the introduction of the E3 Productivity Support Zone as the primary location for “specialized retail premises” in which it must be a mandated permissible use.

We thank you for the opportunity to provide this submission.

Yours sincerely,



Chris Lude
CEO Anaconda