



**THE AUSTRALIAN RETAILERS ASSOCIATION**

**OF**

**AUSTRALIA**

**SYDNEY DEVELOPMENT CONTROL PLAN**

**(SIGNS AND ADVERTISEMENTS) 2015**

**May 2015**

**Australian Retailers Association**

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Date: 24 April 2015

**Australian Retailers Association**

**- Voice of the Retail Industry**

For over 110 years, the Australian Retailers Association (ARA) has been the peak industry body in Australia's \$265 billion retail sector which employs over 1.2 million people. As an incorporated employer body under the Fair Work (Registered Organisations) Act 2009 and with a range of member services including employment relations, policy development, advocacy and education, the ARA promotes and protects over 5500 independent and national retailers throughout Australia.

The ARA provides leadership and solutions to improve the long-term viability, productivity and visibility of the retail industry by proactively dealing with government, media and other regulatory bodies on behalf of our members. ARA members comprise a diversity of sizes and types of retailers reflecting the profile of the retail industry, ranging from large national chain retailers to one-person operators throughout the nation.

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## OVERVIEW

The Australian Retailers Association (ARA) welcomes the opportunity to provide recommendations to the Draft Sydney Development and Control Plan (Signs and Advertisements) 2015.

The Draft Control Plan covers a broad range of issues and this submission focuses on the impacts and observations made for policy options put forward by the Draft Control Plan with respect to the impact on retailers.

Like many of those involved in this area we are deeply concerned over the impact on legitimate and reasonable advertising activities in shop windows and other circumstances, while Council itself sees fit to directly compete with its own street advertising on Council assets while looking to restrict traditional advertising for the businesses who support city growth.

The Draft restrictions on street facing advertising would significantly impact retailers in what is an historical activity drawing consumers into the city by promoting product and offerings. Under these guidelines we could see Christmas advertising and traditional displays restricted, meaning our national members would put more focus in stores interstate and would benefit other Australian cities by promoting their cities as festive retail hubs.

The ARA offers support, information, and representation to around 5500 retailers across the nation, representing approximately 50,000 shop fronts with most major and small to medium retailers in the City of Sydney being members, including all those in key retail locations.

We believe that the ARA membership and retailers in general are well placed to comment on the effects of the Draft Control Plan. The City of Sydney is a global city which has traditionally lagged compared to Melbourne as a retail hub until development and investment created rejuvenation for the retail sector over the last 10 to 15 years. Much effort has been put into retail displays as a factor driving foot traffic, while themed displays around key events including traditional holidays and high end advertising have all added to building Sydney's reputation as a global city with a strong retail offering.

The ARA intends to raise our serious concerns over this Draft Control Plan with both the State Government and Department of Planning.

The ARA represents the interests of retailers within the important advertising experience of the retail economy. It is critical that the perspective of retailers is considered in addition to those of landlord and asset owners in the City of Sydney. Landlords make significant investments in infrastructure and are essential components of the retail economy; they need to make their assets work at a commercial and attraction level. While not many retailers are direct property owners and investors in the City of Sydney retail precinct, they do exist and are located in a number of prominent retail locations. The proposed measures would also impact these retail businesses through the Draft Control Plan.

## ARA POSITION

- The ARA believes the constraint on retailers particularly for street facing businesses will restrict the opportunity to communicate products, new forms of displays and attract foot traffic to their stores and the city in general.
- All retail display advertising is designed to bring customers in-store and makes the city a more vibrant place. Retailers innovate with their displays and with new technologies drawing customers and creating sales. Store displays can be at the leading edge of innovation with mobile, scanning and interactive technologies essential to the vibrant retail experience.
- Sydney is Australia's global city. Retailers, quick food service providers, high end retail and mass market retail all rely on street and other advertising methods to attract global visitors to the city and to their product offerings. Many of these interactions now need to be in multiple languages, meaning forms of display must take into account the nuances of cultural needs to attract visitors.

## Recommendations

- The ARA intends to play a significant role in any review of NSW Planning and is awaiting guidance from the State Government. To this end, we agree with other stakeholders that the current Draft Control Plan should be put on hold until State Government intentions are known.
- The City of Sydney should use the Retail Advisory Panel (ARA's Executive Director Russell Zimmerman is a member) to make recommendations which act in the best interests of retailers.
- Window signage should not be restricted. Retailers rely on innovative interactive signage including light displays to attract consumers into the city.
- Allow special promotional signage for major retail launches and events on buildings.

The ARA has found that many Sydney retailers we have consulted with have major concerns with the proposals put forward. We have also been contacted by relevant advertising and landlord groups over their shared concerns.

The Shopping Centre Council of Australia (SCCA) has shared elements of the URBIS report prepared on this issue. We find ourselves in agreement with all the findings relating to our members, members products and the commercial impacts on landlords which would pass down to retail tenants. The impacts would only be more considerable for those retail businesses who are occupier owners of premises.

As raised in the URBIS report, restrictive signage proposals in Martin Place and Town Hall would affect the viability of much of the product promotions in these areas. The setback size requirements for dynamic content signs could see Christmas light displays and any moving displays not only severely restricted but impact on floor space of retail stores.

## Summary

The ARA urges the City of Sydney to, at a minimum, pause moving forward with this proposal.

Regulators need to consider the negative impact over-regulation of signage restrictions would have on the rapidly developing retail sector in the City of Sydney, as well as how that dynamism has been benefiting Sydney as a global city and business hub through retailers being able to promote the city through advertising.

In a heavily commercial environment such as the retail sector, what seems to be small regulatory changes for a community benefit can in fact remove innovation, commercial outcomes, community dynamism, and could in this case also have ill consequences on the City of Sydney building its reputation as a global retail hub and attraction.

Kind regards,

A handwritten signature in black ink, appearing to read 'R. Zimmerman'.

Russell Zimmerman  
Executive Director  
Australian Retailers Association