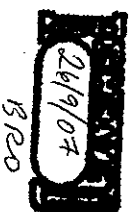




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24 September 2007

Ms Lynne Ashpole  
Director, Better Regulation Office  
GPO Box 5341  
SYDNEY NSW 2001

& via fax to  
02 9228 4408

Dear Ms Ashpole

**NSW Shop Trading Hours reform**

As a major employer and the owner of 20 Shopping Centres in New South Wales, Stockland backs a comprehensive overhaul of shop trading hours in NSW.

We support the Shopping Centre Council of Australia (SCCA) submission and recommendations.

We also make the following points by way of summary.

The current trading regime serves no one. It is a handbrake on business and consumer activity and may be resulting in unintentional breaches of the law, as set out by the SCCA.

All retailers should have equal access to Sunday trading. Restrictions on Sunday trading should be removed, thus eliminating the exemptions system. This would remove confusion among retailers and almost certainly result in administrative savings to the NSW Government as suggested by the Independent Pricing and Regulatory Tribunal in 2006.

Restrictions on public holiday trading should also be removed. The model used in the ACT and the NT is unrestricted, but in practice means that large shops and shopping centres voluntarily close on Christmas Day, Good Friday and on the morning of Anzac Day. The Tasmanian model explicitly excludes trading on these days. Both approaches would provide certainty and savings for business and the consumer.

Please have your office contact Mike Zorbas, General Manager of Government Relations at Stockland on 02 9035 2549 if you have any further queries.

Yours sincerely

John C. Schroder  
CEO  
Retail