

13 September 2007

The Better Regulation Office
GPO Box 5341
SYDNEY NSW 2001

Dear Sir/Madam,

Reform of Shop Trading Hours in NSW

AMP Capital Shopping Centres strongly supports the reform of shop trading hours in NSW.

The present system of regulation, which retains controls over Sunday and public holiday trading hours, is complex and confusing and as a result many retailers are probably unwittingly trading on Sunday in breach of the law. There is no justification, in the current climates for governments to continue to tell people when they can shop.

We believe restrictions on Sunday trading should be removed – as they were removed for Monday to Saturday trading nearly 20 years ago. This would bring the law in NSW into line with that of Victoria, Tasmania, the Australian Capital Territory and the Northern Territory. This would also remove confusion among retailers and would result in administrative savings to the NSW Government.

In relations to public holiday trading we consider it anomalous that NSW restricts trading on more public holidays than all other States and Territories, except the highly regulated States of South Australia and Western Australia. We believe the Government should also remove restrictions on public holiday trading (as in the ACT and Northern Territory).

You will be aware that in these Territories large shops and shopping centres voluntarily close on Christmas Day, Good Friday and on the morning of Anzac Day. Alternatively the Government could adopt similar legislation to Tasmania and remove restrictions on trading hours on all but those 2½ days. Either approach would reduce administrative and enforcement costs for the NSW Government and would provide greater clarity and certainty for retailers, consumers and retail property owners.

AMP Capital Shopping is a member of the Shopping Centre Council of Australia and endorses the more comprehensive submission and recommendations made by the SCCA on this matter.

AMP Capital Shopping Centres (AMPCSC) is a subsidiary of AMP Capital Investors. AMPCSC provides asset, development and property management expertise to the shopping centres owned and/or managed by AMP Capital Investors various property funds and private clients.

Currently AMP Capital Investors have 20 Shopping Centres in New South Wales with a combined gross lettable area of 540,201 square metres and a capital value of \$3.5 billion.

Yours sincerely



Bryan Hynes
Head of Retail Asset Management
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