



# Lane Cove Council

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Ms. Aoife Wynter  
Director, Employment Zones,  
NSW Department of Planning, Industry and  
Environment  
Locked Bag 5022,  
PARRAMATTA NSW 2124

Dear Ms Wynter,

## **Re: Proposed Employment Zones Framework - Lane Cove Council response**

Council welcomes the opportunity to make comment on the new proposed employment zones framework. Council recognises the value of simplifying the large range of business zones, and particularly of refocusing these business and industrial zones on their principle role in providing employment.

### Summary

The impacts on Council's Local Environmental Plan (LEP), can potentially be summarised as follows. Our existing:

- B1 Neighbourhood Centre zone and B2 Local Centre zone would be merged into the new E1 Local Centre zone;
- B3 Commercial Core zone (in St Leonards) would become E2 Commercial Centre zone;
- IN2 Light Industrial zone (in Lane Cove West) would become E4 General Industrial zone;
- B4 Mixed Use zones would become MU1 Mixed Use zones; and
- IN4 Working Waterfront zone (in Greenwich) would become W4 Working Foreshore zone.

These changes would also include some new objectives and permissible land uses across all of these proposed zones, along with new and updated definitions of various associated land uses. While Council can support some of the proposed changes, there is potential for problematic consequences to occur. These are detailed below.

### General comments

In principle, Council supports:

- The obvious need to update and add new definitions such as ‘data centre’, ‘creative industry’, and ‘local distribution premises’;
- Allowing existing LEP zone objectives and land uses to be transferred over to the new zones to reflect local differences.
- The continued use of parent terms to cover child terms in land use tables and moves to allow certain complementary land uses to co-locate, where appropriate.

### Amalgamation of B1 Neighbourhood Centres and B2 Local Centres

Several problematic consequences arise from the combination of fewer zones and ‘greater diversity of mandated permitted uses’. In particular, the blending of the current B1 Neighbourhood Centres and B2 Local Centres threatens the existence of the neighbourhood centres.

For example, by mandating the parent term ‘commercial premises’ in E1 Local Centre, a range of new uses are mandated that are inappropriate to the vision of neighbourhood centres as basically serving those who “live or work in the surrounding neighbourhood”. Such larger-scale businesses as hardware & building supplies and vehicle sales premises are likely to replace smaller-scale local businesses as more viable enterprises, i.e. Bunnings to replace the corner shops, Toyota franchises to replace the local vet.

A further, possibly unintended consequence is that by mandating the parent term ‘tourist and visitor accommodation’ in neighbourhood centres, it will permit such inappropriate uses as motels and serviced apartments at the expense of less viable local uses such as shop top housing. Likewise, amusement centres, entertainment facilities, indoor recreation facilities and function centres are district attractors that can be expected to replace smaller neighbourhood shops and medical centres.

Council’s strategic objective for its variety of centres is expressed in its *Local Strategic Planning Statement*. Planning Priority 9 aims to:

*Support shopping precincts to enable local shopping*

It reads:

*the desired future character of Lane Cove’s [five] neighbourhood centres is as pedestrian-friendly, cyclist-friendly, active, **small-scale** neighbourhood centres serving **local** residents.*

This remains an on-going Action of Council’s LSPS, a 20-year vision that values diverse local character, and the unique sense of place and belonging associated with smaller-scale neighbourhood centres. Further, while it is desirable to “encourage a vibrant Local Centre” through some residential development, the vibrancy of smaller-scale neighbourhood centres must focus on local populations, and not at the expense of broader district vibrancy. As the base level of the hierarchy of centres, they are supported by Objective 8 of the North District Plan:

*Greater Sydney’s communities are culturally rich with diverse neighbourhoods.*

### Mandated uses undermine strategic planning

The proposal to mandate entertainment uses like Recreation facilities (major and outdoor), and tourist and visitor accommodation in E2 Commercial centres has the potential to undermine the principle role of such strategic centres as St Leonards as high-density, office-style employment centres.

St Leonards is designated as one of Sydney's nine 'commercial office precincts' under the Greater Sydney Regional Plan and the North District Plan, but competition from these uses would threaten its fundamental role of growing jobs within the Eastern Economic Corridor to establish "Greater Sydney's *global competitiveness into the future*" (Regional plan).

### E4 General Industrial zone

Lane Cove Council's IN2 light industrial zone (Lane Cove West) has a range of uses within one character area, and best translates to the one proposed E4 General Industrial zone. Council supports the opportunity in the proposed framework to add optional locally-preferred uses, such as Centre-based child care facilities and Medical centres.

On the other hand, Council is concerned that some heavier industries (such as freight transport facilities) would be permitted within Lane Cove West, with the potential to impact the immediately adjoining residential zone. As a result, Council requests that its current zone objective "*To recognise the close proximity of this zone to adjoining residential areas and seek to mitigate potential conflict between industrial and residential uses*" be retained and transferred over to any new framework.

### Prohibited uses

The proposed Standard Instrument Order, unlike current NSW practice, does not list additional Prohibited uses, apart from Pond-based aquaculture. Currently, Council's LEP prohibits "*any other development not specified in item 2 or 3*" across all its zones to create certainty for all stakeholders.

It is recommended that Council's approach be maintained in its LEP to continue to create future certainty.

### Renumbering employment zones

Currently the Standard Instrument (Local Environmental Plans) Order 2006, divides all land use zones into eight (8) categories with individual sub-sets that appear in every LEP. They are:

- Rural (RU) Zones;
- Residential (R) Zones;
- Business (B) Zones;
- Industrial (IN) Zones;
- Special Purpose (SP) Zones;
- Recreation (RE) Zones;
- Environment Protection (E) Zones; and

- Waterway (W) Zones.

It is noted that numbering of the proposed new employment zones (E1, E2 and E4) appear to be identical to the existing numbering of Environment Protection (E) zones. Even though these are different types of land use zones, this has the potential to cause confusion and unnecessary conflict.

This would necessitate the need to either renumber the current Environment Protection zones E1 to E4 or renumber the proposed employment zones to EM1 to EM5. Council suggests that less disruption would be caused by numbering the employment zones EM1 to EM5. This is a system currently used to differentiate R (residential) zones from RE (recreation) and RU (rural) zones.

For any queries, please do not hesitate to contact me on [REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]

**Executive Manager, Environmental Services**