

Department of Planning, Industry and Environment
Director Employment Zones
Locked Bag 5022
Parramatta NSW 2124

Dear Sir/Madam

Explanation of Intended Effects – Employment Zone Reforms

Thank you for giving Queanbeyan-Palerang Regional Council (QPRC) the opportunity to comment on the Employment Lands Zone Reform package currently being exhibited by the Department.

Council has reviewed the draft documentation and provides the comments below as feedback.

Naming of Proposed Zones

It is noted that the package seeks to replace a number of existing 'business' and 'industrial' zones with a number of new 'employment' zones. Further, that it is intended to name those new zones with the same zone descriptions that currently apply to environmental zones (ie, E1, E2, E3 and E4). This should be fundamentally reconsidered as this approach will result in significant confusion amongst the profession, industry, government and the community. It is very common for communication around zoning matters, either in writing or orally, to use these descriptors rather than the full zone name, and pursuing the proposed approach will create confusion and miscommunication.

It seems that it could have been equally valid and appropriate to have continued with the existing 'B' descriptor for each zone (including the proposed industrial zones). Another sensible alternative may have been to label the zone 'EM'. As noted the proposed descriptors will introduce additional and unnecessary confusion. Council would strongly request that the Department revisit this proposed approach.

It is also unclear why a new descriptor needed to be created for the Mixed Use zones (ie, 'MU'). The vast majority of uses proposed to be mandated in the zone are business type uses and it seems no reason that this zone needed a unique descriptor. Regardless, if it is the Department's intention that it be a genuine mixed use zone then those desired residential uses should also be mandated in the standard instrument, otherwise it is likely business type uses will continue to be the primary developments in the zone.

It is also unclear why the proposed *SP4 – Local Enterprise* zone isn't included with the other business zones and has instead been given a special use zoning. Whilst there may be some logic to having a zone to cover areas that had previously been SAPs or similar, is unclear why this would be a special purpose zone and not a

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employment/business zone if the intention of the zone is to create jobs and promote economic development.

Zone Purposes and Applicability

Council is of the view that most of the proposed zones can be accommodated within the Queanbeyan-Palerang context. Council had previously raised a concern about the lack of a designated light industry zone however note the proposed 'Productivity Support' zone intends to mandate light industries as permissible with consent.

As already mentioned Council is of the view it would be a better outcome to have grouped the proposed Mixed Use Zone and Local Enterprise zone into the same employment /business category as the employment zones for consistency.

In respect of the proposed W4 Working Foreshore zone, staff had always understood the waterway zones apply to waterways themselves, not the adjacent land. The proposal to transfer the IN4 Working Waterfront zone to W4 Working Foreshore zone would see waterway zonings now applying to land and not waterways. It is unclear why the IN4 Working Waterfront zone could not have been wholly replaced by one of the newly proposed zones, with suitable waterway related uses inserted as additional uses as required.

New Definitions

The newly proposed zones and intended uses are generally supported. Similarly the proposed amendments to zones objectives are generally supported.

Council would suggest that a more suitable name for 'circular economy facility' be considered. That definition is vague and not descriptive of the actual development or use proposed. 'Repair and reuse facility' or even 'recycling facility' would be more suitable definitions in this instance.

Innominate Uses

Council notes there is limited commentary as to how innominate uses will be addressed. Council has previously suggested the Department give consideration to making innominate uses 'permissible with consent' in the zoning tables for employment/business zones, particularly given a key aspect of the reforms is to encourage and facilitate emerging business and industries.

Council would encourage the Department to give further consideration to this issue.

Workload Impacts

Council notes there is little discussion or consideration of the potential workload implications on local councils associated with the Department making such significant changes.

As a consequence of the proposed reforms, QPRC will be required (at the very least) to:

- amend most of its development control plans,

- update Council's systems and processes for generating 10.7 certificates,
- update numerous local policy documents including contribution plans, checklists, planning and development guidelines, etc, and
- update Council's respective GIS mapping system.

There will be significant cost and resourcing implications associated with these proposed changes. It is an ongoing concern of the Council that the Department does not provide due weight to the cost and resourcing implications for local government when it proposes such significant changes. From QPRC's perspective, it has not experienced significant problems with the existing business and industrial zoning framework and is not of the view the proposed reforms are crucially required at this time.

Again thank you for the opportunity to make a submission. If you have any enquiries in respect of this matter please contact myself on [REDACTED].

Yours sincerely

[REDACTED]

3 June 2021

Martin Brown

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Queanbeyan-Palerang Regional Council