

29 June 2021

Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Submitted online

Dear Sir/Madam,

Re: Employment Zones Reform

Council welcomes the opportunity to provide feedback on the proposed changes to employment zones in the Standard Instrument LEP (2006).

The Employment Zone Reforms have been reviewed by staff of the City of Canada Bay. In-principle support is provided for the proposed changes to land use zones.

We wish to draw the attention to a number of specific concerns, where we believe that the proposed zones will not accommodate the intended employment outcomes of existing zones in the City of Canada Bay or may result in additional impacts to our local community.

Local Centre/Neighbourhood Centre

The exhibition package states that the restricted number of permissible land-uses in the B1 Neighbourhood Centre zone inhibits the evolution of centres. The City of Canada Bay has approximately 26 different areas spread across the LGA that are zoned B1 Neighbourhood Centre. For the most part, these areas comprise a small number of lots that offer local services to the immediate community.

The reforms propose to translate this zone to an E1 Local Centre Zone. The objectives and uses proposed for the E1 Zone are inconsistent with the small-scale local intent of the B1 Neighbourhood Centre and would introduce uses that may be inappropriate in these areas.

It is requested that the following five uses not be mandated as permissible in the E1 Zone.

- Amusement centre
- Entertainment facility
- Function centre
- Local distribution premises
- Tourist and visitor accommodation

This will provide Council with the discretion to permit/prohibit these uses based on local circumstances.

Productivity Support/Business Park

The Position Paper suggests that the existing B7 Business Park zone could be translated into the new E3 Productivity Support zone. The City of Canada Bay has a Business Park which is characterised by office premises with large floor plates and a high concentration of jobs. This intended outcome is not compatible with a number of uses that are mandated in the proposed E3 Zone.

It is requested that the following four uses not be mandated as permissible in the E3 Zone.

- Function centres
- Markets
- Specialised retail premises
- All uses consistent with an industrial zoning, including urban support services

This will provide Council with the discretion to permit/prohibit these uses based on local circumstances.

Naming of zones

The proposed new employment zones have been given an E code which is similar to the E codes associated with existing environmental zones. This outcome is likely to cause confusion and clarification is sought in relation to the naming of Environmental zones.

Definitions

New and existing LEP definitions often refer to land uses or matters that would also benefit from being defined within the LEP. An example of this is the new definition for a “domestic goods repair and reuse facility” in which it is specified that this use does not include an “op shop”. Unfortunately, an “op shop” is not a defined term and therefore the new definitions create further uncertainty. All existing and proposed definitions should be reviewed to ensure that all uses and matters referred to within a definition are separately defined within the Dictionary.

Other

We note that the Employment Zone reforms are occurring concurrently with the changes to complying development associated with Building Business Back Better. Given the interrelationship between the two sets of reforms, it is requested that changes related to Building Business Back Better be deferred until such time as the Employment Zone reforms are finalised. This will enable local government and the community to have a greater appreciation of the impacts of the proposed changes.

Should you have any enquires in relation to this letter, please contact [REDACTED]
[REDACTED].

Yours sincerely

[REDACTED]

[REDACTED]

Manager Strategic Planning