

29/06/2021

Director Employment Zones

NSW Department of Planning, Industry and Environment

Locked Bag 5022, Parramatta NSW 2124

## Submission – Employment Zones Reform. Reference 175, 177 Taren Point Road Caringbah and 94 – 98 Parraweena Road Miranda

Dear Sir or Madam,

This letter is a submission relating to the NSW Government Employment Zones Reform which seeks to replace existing Business (B) and Industrial (IN) zones with five new employment zones and three supporting zones under the Standard Instrument LEP. This submission is made following a review of the following DoP documents:

- *Employment Zones Reform Position Paper*
- *Draft Employment Zones Framework Implementation Plan – 14 May 2021*
- *Draft Standard Instrument Principal LEP Amendments – 14 May 2021*
- *Proposed Land Use Matrix – Employment Zones*

This document has been prepared by Planik Pty Ltd on behalf of [REDACTED], with particular reference made to a site owned by [REDACTED] at 175, 177 Taren Point Road Caringbah and 94 – 98 Parraweena Road Miranda that is currently zoned IN1 – General Industrial under the Sutherland Shire LEP 2015. This submission seeks to request that consideration be made by the Department with respect to the transition of current zones to the new planned employment zones.

The main purpose of this letter is to demonstrate that the strategic intent of zone translations is not black and white. The following letter serves to demonstrate that an existing IN1 zone (adjacent to B5) is currently characterized by predominantly specialized retail uses along the western side of Taren Point Road between Box Road, and Kumulla Road Caringbah and therefore instruction to Council's for allocating future zones should allow a flexible approach to zone application.

The Proposed Employment Zones Framework serves to detail the proposed new employment zones and support zones and identifies the strategic intent of the new zones. This submission seeks consideration of the above land in Taren Point (Sutherland Shire) for zoning as a E3 Productivity Support zone.

It is acknowledged that the Department of Planning will not specifically seek to rezone all current B and IN land on a site-by-site basis, rather a transition implementation toolkit will change current zones and then the translation reviewed by Council. Nevertheless, this submission seeks to provide a site specific example of IN1 zoned land that should be subject of translation to the E3 Productivity Support zone under the new Employment Zones Reform.

## Background & Site

This submission is prepared to identify a site-specific example of currently IN zoned land for potential E3 Productivity Support transition under the Department of Planning's zone reform.

The sites are located within an IN1 General Industrial zone and adjoin specialised retail premises within the surrounding locality, noting land opposite Taren Point Road is zoned B5 Business Development to the east, north east and south east. The main difference in these is that *specialised retail premises* are permitted in the B5 but not in the IN1 zone. Notwithstanding the difference in permissibility, a large proportion of sites within the precinct's IN1 zone include businesses with retail components. These include:

- Lighting specialised retail at 191 Taren Point Road
- A range of retail/commercial premises at 181 Taren Point Road including sports equipment (OZtag), furniture store (Lazboy), music centre, furniture store (Sit Sleep Relax).
- Large furniture – specialised retail premises at 177 Taren Point Road
- Lounges Plus Furniture & Bedding at 94-98 Parraweena Road
- Beacon Lighting 105 Parraweena Rd Taren Point
- BCF Australia 119 – 121 Parraweena Rd Taren Point.

This submission confirms that the subject site and surrounds is an example of an IN1 zone that meets the criteria for translation to E3 Productivity Support zone under the new employment lands zoning reform.



181 Taren Point Road



189 Taren Point Road



191 Taren Point Road



191 Taren Point Road



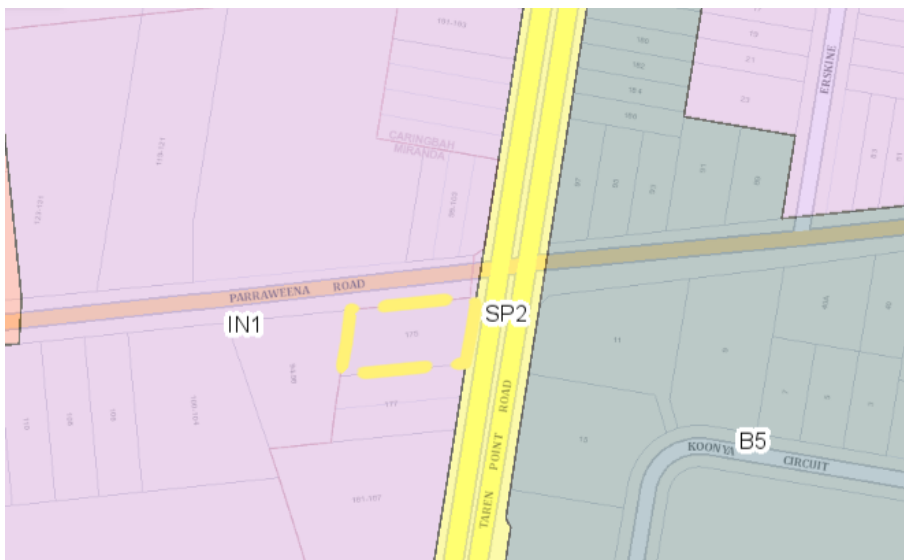
177 Taren Point Road



94 - 98 Parraweena Road



**Figure 1** Site Location Map Source: SIX Maps



**Figure 2** Site & surrounds zoning map – Taren Point Road, Caringbah

The site at 175 Taren Point Road is currently a construction site after an original refusal (14 November 2017) was appealed and a deferred commencement approval was granted 14 May 2018 for: *Construction of an industrial building with carparking for use as a warehouse and distribution centre for floor finishes with ancillary office space.*

While the building can accommodate a warehouse and distribution of floor finishes, the quality of the build with its high end finishes, the floorplates and the position are better suited to higher employment generating uses such as specialised retail and office premises.

### Submission

The Department of Planning's Proposed Employment Zones framework envisions the following translations of existing zones to the new proposed employment zones:

<p><b>General Industrial zone</b></p> <ul style="list-style-type: none"> <li>• Primarily accommodates light and general industrial uses and warehousing uses.</li> <li>• Allows for infrastructure and utilities.</li> <li>• Generally replaces IN1 General Industrial and IN2 Light Industrial zones.</li> <li>• Limits general retailing to meet workers' daily needs or to sell products manufactured on site.</li> <li>• Does not support residential uses.</li> </ul> <p><b>Heavy Industrial zone</b></p> <ul style="list-style-type: none"> <li>• Primarily accommodates heavy industry (i.e. hazardous and offensive industry) and associated storage and depot.</li> <li>• Allows for infrastructure and utilities.</li> <li>• Replaces IN3 Heavy Industrial zone and potentially some IN1 General Industrial zones.</li> <li>• Does not support residential or retail uses.</li> <li>• Excludes incompatible development to ensure the efficient and productive use of the land and its long-term viability as heavy industrial land.</li> </ul>
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**Figure 1 – Strategic intent of new Employment Zones E4 & E5.**

It is understood that the zone transition to the new employment zones is to be mapped out by the DoP, with Council's then validating the general translations, refining application of the new zones to their LGA and listing any additional permitted uses.

In this regard, this submission proposes that the above strategic intent for the E4 & E5 zones does not apply to the subject site, or the precinct, rather, this section of Taren Point Road and Parraweena Road Caringbah is more suitable site for the newly envisioned Productivity Support zone, as described below:

<p><b>Productivity Support zone</b></p> <ul style="list-style-type: none"> <li>• Allows for a mix of services, low impact industry, creative industry, manufacturing, warehousing, office and limited supporting retail.</li> <li>• Essentially replaces B5 Business Development, B6 Enterprise Corridor, some B7 Business Parks and in exceptional circumstances limited areas of IN2 Light Industrial zones that no longer function as traditional industrial precincts.</li> <li>• Suits locations near catalyst development (such as health and education) to support those uses through development such as a larger campus style business park.</li> <li>• Suits emerging and new industries that need larger floorplates.</li> <li>• Limits retail to uses requiring larger lots/floorplates (e.g. specialised retail premises), or that meets workers' or businesses' daily needs, or that sells products manufactured on site.</li> <li>• Generally does not support residential uses.</li> </ul>
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**Figure 2 –**

Strategic intent of new Employment Zone E3.

The strategic intent for the E3 Productivity Support zone does not envision the translation of existing IN1 General Industrial zoned land to E3 zoning. We submit that the DoP should consider that existing IN1 zoned land in certain locations within close proximity to B5 Business Development and other business zones are equally as suitable for translation into E3 Productivity Support zoning, and associated modern and dynamic land uses including specialised retail premises, artisan manufacturing premises, and low impact industrial/warehouse uses.

The subject site is located opposite B5 Business Development zoned land, with the locality primarily characterised by 'big-box' store specialised retail with warehouse uses surrounding. The envisioned development of 175 Taren Point Road, Caringbah under previous Development Applications is depicted in the following photomontages:



Figure 3: Photo Montage of approved building at 175 Taren Point Road.

### **Employment Generation**

Given the above information and site context, it is considered that the IN1 General Industrial zone along Taren Point Road, Caringbah meets the criteria for future translation into E3 Productivity Support zoned land. With respect to employment, it is considered that the current zoning of the land on these lots restricts the maximum achievable intensity of land uses – (3-4 employees) given the scale of any permissible uses in this zone is limited to the context of the site along a major road.

This submission confirms that the subject site and surrounding zone is suitable for future E3 zoning, with potential for far greater employment generation by allowing for a diverse range of dynamic land uses including specialized retail premises and industrial uses. The location of the zone along Taren Point Road is conducive to the E3 zone and would encourage far greater employment within the locality context.

In summary, we submit:

- The DoP's current strategic intent for the new Employment zones is for a 'translation' approach for up to 70% of existing zones, with support for Council's following from this to finalise and review the broad approach.
- The strategic intent for the E3 Productivity Support zone is that it will generally encompass B5, B6, B7 and some IN2 zoned land.
- The strategic intent for the E4 General Industrial zone is to replace existing IN1 & IN2 zoned land.
- We submit that the strategic intent for the E3 zone should include potential for current IN1 zoned land to be included in E3 zoning under the same criteria that would allow for current IN2 zoned land – **'zones that no longer function as traditional industrial precincts'**
- This would allow for IN1 zoned, where multiple non industrial uses exist on land at the periphery of Business zoned land like– 175 Taren Point Road, 177 Taren Point Road, Caringbah & 94 – 98 Parraweena Road Miranda o be translated to a more appropriate zoning given the site context.
- This would allow for specialized retail premises and other quasi-retail/industrial land uses within these zones that are appropriate for current IN1 zoned land in proximity to Business zoned land and located in highly visible and accessible locations.

While it is acknowledged that General Industrial land uses and space for those land uses should be preserved, where the current and historical mix of land uses leans towards another proposed zone (E3 Productivity) this zone should be applied under the circumstances.

## Conclusion

The above submission seeks consideration by the DoP to amend the strategic intent for the new E3 Productivity Support zone to include potential translation of existing IN1 zoned land where appropriate. It seeks the same criteria to be applied to both IN1 and IN2 zoned land in potentially converting to E3 Productivity Support zones where appropriate.

We trust the above information allows the DoP to consider the above recommendation and provides a site-specific example of potential application of this submission. Please contact the undersigned if you require any further information.

