



29 June 2021

Department of Planning, Industry and Environment  
Via Planning Portal

Dear Sir/Madam

### **Submission - Employment Zones Reform**

Thank you for the opportunity to comment on the proposed Employment Zones Reforms and associated Employment Zones position paper and amended Standard Instrument Local Environmental Plan (SI LEP).

Council supports reforms that provide a more consistent approach to strategic planning and development assessment, reduce complexity and simplify the planning system. Council also supports reforms that promote the delivery of business development and employment opportunities. The consolidation of employment zones as proposed by the Employment Zones Reform provides the opportunity for this.

Council staff provide the following comments on the employment zones reform for your consideration. Please note the below is officer-level feedback from working with the framework on a day-to-day basis and does not form the formal opinion of Council:

- The consolidation of business and industrial zones into a smaller set of employment zones is supported. This simplifies a currently-over complicated zoning structure and will increase the understanding of the planning system generally;
- The proposed SP4 Local Enterprise, E3 Productivity Support and MU Mixed Use zones all seem very similar, promoting a mix of uses that support surrounding areas. The zoning structure could be further simplified by combining these into a single zone.
- The use of 'E' as the symbol letter for these zones is problematic, as 'E' is commonly known to represent environmental zones. Perhaps 'P' for productivity would be a better symbol, or a range of symbols such as 'C' for centres, 'I' for Industry or 'W' for work would be more appropriate. Changing the environmental zones to something else would be less preferred as 'E' is widely known for environment.
- As with any amendment to land use zones and land use permissibility, there is the potential for the creation of existing use rights. The reforms propose some amendment to some of the large format retail land uses, as well as redefining some industrial uses. The proposed amendment of these definitions could potentially remove the ability for the expansion of current land uses, given the restrictions associated with existing use rights.



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- Shop Top Housing is an important residential typology that promotes activation of centres and supports night time economies. It is agreed that the definition should be expanded to permit more than ground floor commercial development. This would reinforce the role of shop top housing as being predominantly for commercial uses with the residential component being subordinate to the commercial component. Limitations on the extent of residential should remain although it is acknowledged in some very busy high-density areas further flexibility may be appropriate.
- The proposed reforms make many more uses permissible with consent within centres, including large floorplate retail, timber yards and landscape supplies. Such land uses may not be compatible with other more discrete commercial premises. This is particularly problematic for some of the lower order centres, which generally provide goods and services for the needs of the local/adjoining residential community. Whilst the larger land uses are unlikely pop up overnight, there is the potential for the service function of a small centre to be eroded over time, with a mix of retail and services being replaced by a single use. There could be pressure to rezone areas around the current neighbourhood centres to accommodate these large floorplate uses. In many instances the small-scale neighbourhood centres / shops generally adjoin low density residential areas. The mandated land use permissibility should be reviewed to minimise these potential impacts.
- The updating of existing definitions within the SI LEP to modernise land use terms is supported.

Should you require further information regarding Council's submission, please contact [REDACTED]

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[REDACTED]

Yours sincerely

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