

(Doc Id: 767426)

30 June 2021

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Subject: *Employment Zones Reform*

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Dear Aoife

Thank you for referring Council to the preliminary framework for the Employment Zones Reform. Council has reviewed the relevant documentation and made the below points for your consideration.

Ability to choose options outside of recommended zone translations

Council notes that the Department of Planning, Infrastructure and Environment have to put limitations around the zone translations, with limited ability to choose zones outside of the recommendations. Council would like to highlight how important it is to trust Councils, especially Regional Councils, to work closely with our DPIE Regional Teams to identify the best zone translations for our LGA's. Regional Councils have a deep understanding of their communities, and have a close working relationship with our DPIE Regional Team Members meaning that together would be able to make use of these reforms to create excellent planning outcomes for our regional towns. It is for this reason we are proposing that a pathway for transition could be created that allows Councils to identify zones outside of the recommended translations should it work for particular areas. We envision that this could be a similar document to a Planning Proposal, with the main test being whether the proposed zone reflects current use – as opposed to future use or strategic planning. This should be assessed by our Regional Team in a similar way that Planning Proposals are, with the same level of consultation that will be required for "Direct Translation" moves, but without the formal Gateway Determination process needed for Planning Proposals.

Union Street, Forbes, which is currently zoned General Industrial, is a key example of where this pathway would create better outcomes for our Communities. Attached is a recent audit of the businesses on Union Street. The General Industrial area of Union Street hosts some light industries, retail, dwelling houses and commercial offices as shown below. This area appears to be best suited to MU1 Mixed Use zone or possibly the Productivity Support Zone as opposed to General Industrial or Heavy Industrial as it borders R1 General Residential and hosts a number of dwellings within the zone.

A strong justification, similar to that provided with a Planning Proposal, could easily be provided to demonstrate that this land should transition to MU1

Mixed Use Zone as part of these reforms. This would be a good example of how the reforms have allowed Council to achieve a better planning outcome for communities in regional towns, without a high level of financial and staff resourcing dedicated to the project from Council.

Light Industrial to Transfer to more zones

It is currently proposed that Light Industrial can move to General Industrial Zone, and this should be expanded to include the Mixed Use Zone and the Productivity Support Zone. A direct transition for Light Industrial to General Industrial will not work for Forbes, and many other regional towns, as many of our Light Industrial Areas host retail, dwellings and are often used as a buffer between residential development and railway lines or heavier industries. Council notes that the discussion paper does allow for “a very small number of IN2 Zones” to transition to a Productivity Support Zone only if Council has undertaken an employment lands needs analysis. Regional Councils do not have the capacity to do this work and many of our zones already obviously operate more as a Mixed Use or Urban Support Zone as detailed above. There should be an alternative pathway provided that requires a lower level of staff capacity, especially at smaller Councils that may only have one Town Planner, if any at all.

Residential Accommodation in Mixed Use Zone

The Mixed Use Zone should allow for an environment for dwelling houses with a business operating on the same block of land, that exceeds the thresholds for Home Occupation or Business. Council often receives enquiries from members of the public looking for a location where they could live and operate their own business, for example a mechanic or other small business. A Mixed Use Zone is the appropriate zone where this type of development can take place.

The proposed land use table has the majority of residential accommodation prohibited in the zone. Council proposes that residential accommodation be optional, acknowledging that Councils play a successful role in managing land use conflict between residential accommodation and commercial development.

Suggestions for Councils Support

To support Councils in undertaking this transition, Council suggests the following:

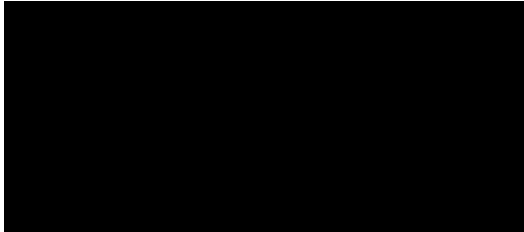
- Guidelines and examples of the use of each zone so Council can clearly compare their locations to these examples and make clear choices. These should be given in a city and regional context. For example, a Commercial Core Zone in a regional town is likely to look very different to a Commercial Core Zone in Parramatta;
- Guidelines for managing land use conflict, and suggestions for appropriate neighbouring zones;
- DPIE to provide amended GIS layers once the changes come into effect for Councils to upload onto internal systems;
- Phone support and guidance in interpreting the changes and identifying the ideal zones for each area;
- Flexibility for Council to identify alternative zones outside of the recommended translations.

Thank you again for taking the time to consult with Forbes on these reforms. As discussed, these reforms create a wonderful opportunity for Councils to

be able to review our Employment Zones and match them up to the best “new” zone to be created as part of these reforms. Trusting Councils to make this decision in consultation with the Regional Team would go great lengths to creating good planning outcomes for our Communities.

I trust this information is of assistance. Should you have any enquiries please do not hesitate to contact [REDACTED]
(Option 1).

Yours sincerely



Mathew Teale
Acting Director
Planning and Growth

Industrial Zone Audit

[Union Street, Blackett St, Little Union St & Stephen St]

1 Office	11 Residential	21 Gas Supplier
2 Manufacturing	12 Residential	22 Residential
3 Men's Shed	13 Residential	23 Industrial
4 Bus Depot	14 Residential	24 Industrial
5 Storage	15 Residential	25 Residential
6 Residential	16 Manufacturing	26 Residential
7 Residential	17 Office	27 Residential
8 Residential	18 Commercial	28 Residential
9 Residential	19 Service Station	29 Vacant
10 Residential	20 Gas Works	

Industrial
Business/Commercial
Residential
Vacant

