

Draft Submission – Employment Zones Reform

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Introduction

Camden Council thanks the Department of Planning, Industry and Environment (DPIE) for the opportunity to provide comment on the Employment Zones Reform.

Council broadly supports the intent of the reform to maximise productivity and address barriers within the planning system that limit the ability of businesses to establish, expand or adapt.

Council requests that further consideration be given to the:

- Potential for unintended consequences and land use conflict;
- Potential impacts on increasing the permissibility of complying development;
- Future impacts and consistency with the South West Growth Area;
- Need to ensure certainty for the community and retain the retail hierarchy;
- Preservation of existing Employment Lands;
- Need to ensure legibility and consistency; and
- Need to ensure local business and landowners are fully consulted.

Council would welcome the opportunity to work with DPIE to develop and implement this framework to ensure positive outcomes are achieved.

Local Context

Council's policies for employment lands include the Local Strategic Planning Statement (LSPS) and draft Centre's and Employment Land Strategy (CELS). These policies seek to provide certainty to the community and set out a twenty-year planning vision that is encapsulated in the 2040 Camden Structure Plan (see Figure 1).

Camden's Local Strategic Planning Statement (LSPS)

The LSPS planning vision emphasises land use, transport and sustainability objectives for Camden. The productivity component of the LSPS sets out the vision for diverse employment lands and includes the following local priorities:

- Increase the quantity and diversity of local jobs, and improving access to jobs across the Western City District;
- Create a network of successful centres;
- Strengthen the Strategic Centres of Narellan and Leppington;
- Ensure a suitable supply of industrial and urban services land; and
- Leverage industry opportunities created by Camden's proximity to the Western Sydney Airport and Aerotropolis.

Draft Camden's Centres and Employment Land Strategy (CELS)

The draft CELS sets the vision for Camden's retail centres and industrial and urban services land. The draft CELS is consistent with the LSPS and provides more detailed direction regarding employment lands.

The directions relevant to Employment Lands are "*A network of successful and attractive retail centres*" and a "*A network of productive industrial and urban services land*". Relevant principles of the draft CELS include:

- A defined centres hierarchy that provides certainty around the role of each centre,
- A planning framework that supports centres,

- Industrial and urban services land is productive and functional; and
- A planning framework that supports industrial and urban services land.

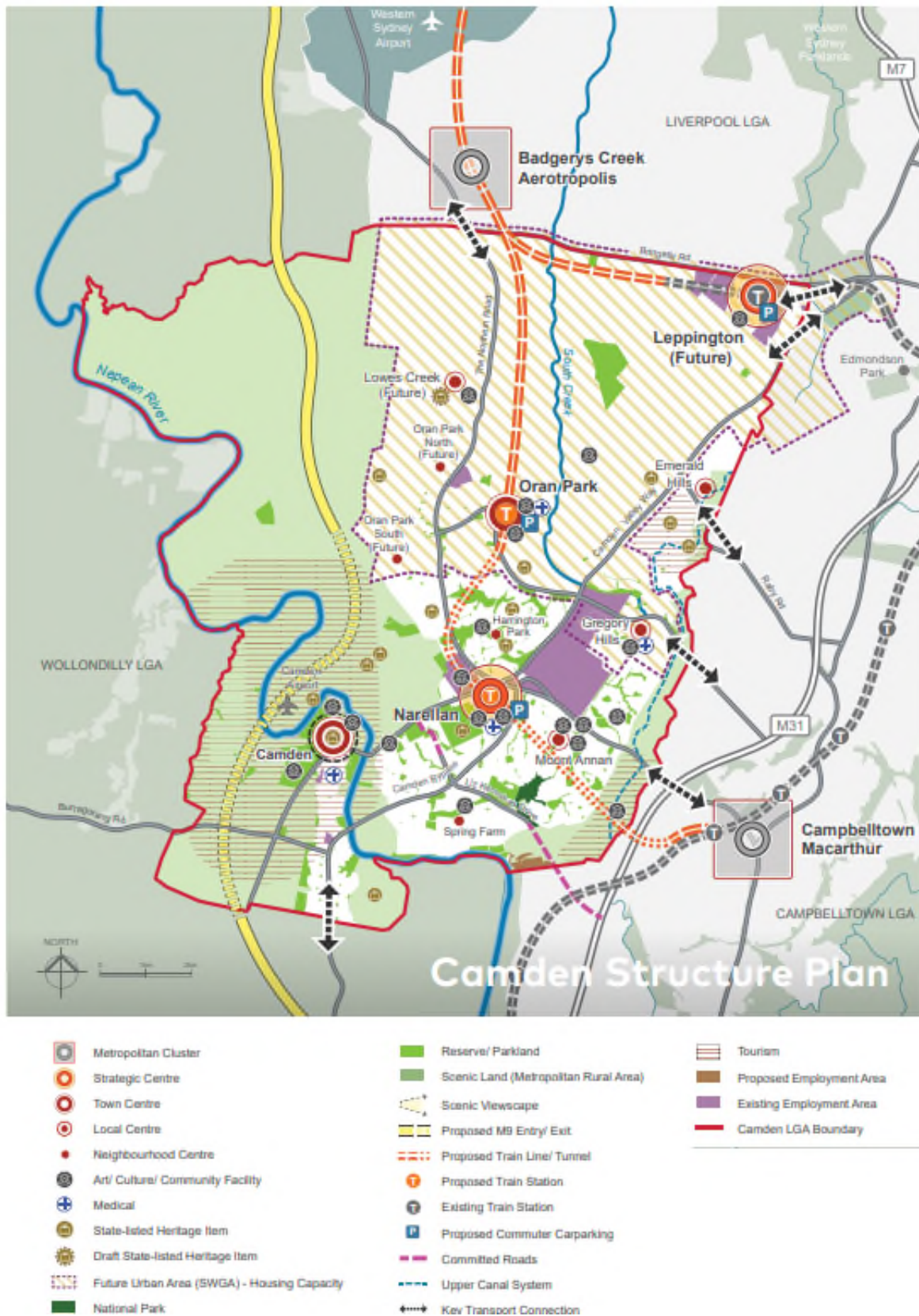


Figure 1 Camden Council Structure Plan

Key Considerations

Address potential for unintended consequences and land use conflict

The expansion of the mandated uses within certain zones may lead to amenity impacts and land use conflicts. DPIE must ensure that the proposed reforms do not cause environmental degradation or social and economic disruption as a result of the proposed changes.

Collaboration with Council prior to implementation of any proposed changes is essential to avoid unintended consequences.

Recommendation:

- DPIE to collaborate with Council to identify potential land use conflicts and to mitigate unintended consequences.
- DPIE to ensure timeframes have a greater degree of flexibility included to allow for detailed collaboration with Council.
- Collaborate with Council to translate the reforms into the Camden LEP.

Address potential impacts on complying development

Council seeks clarification about the interrelationship between the proposed zoning reforms and the '*Building Business Back Better*' (BBBB) project, which includes changes to State Environmental Planning Policy (Exempt and Complying Development Codes) 2008.

The proposed inclusion of additional mandated uses as complying development would remove the community's opportunity to have a say about large scale local development that may have visual, acoustic, privacy, parking, and solar impacts.

There may be a need to re-exhibit both reform packages to ensure the implications are fully understood.

Recommendation:

- DPIE to clarify the relationship of the reform with the '*Building Business Back Better*' project and re-exhibit both proposals concurrently.

Provide clarity about growth area land

Camden has significant areas of Growth Centre land which has been recently rezoned or is proposed to be rezoned and will facilitate additional employment lands. This includes Leppington Town Centre, Leppington Stages 1 to 5, Lowes Creek Maryland, South Creek West, Oran Park, Catherine Field and Turner Road. This land will remain under the Growth Centres SEPP and has not been included within the reform package.

The proposed Employment Lands Reform will create two distinct zoning frameworks within the Camden LGA. For future investment and development confidence, Council would like to know if and how DPIE propose to expand these reforms into the growth areas.



It is noted that greenfield areas require specific zonings to ensure that character, scale and function can be formed over time.

Recommendation:

- DPIE to provide Council with further information as to how these reforms may be expanded to apply to the Growth Centres SEPP, noting that greenfield areas require specific zonings to ensure that character, scale and function can be formed over time.

Provide clarity about changes to residential uses in employment zones

Robust measures are needed to contain excessive residential development from eroding employment lands. In this regard, clarification is needed regarding proposed changes to residential uses in employment zones.

Specifically, the FAQ provided mentions Build to Rent housing (BTR), however the reform package did not expand on the implications of BTR within the proposed employment lands framework.

Recommendation:

- Retain existing prohibited residential accommodation development types as part of the proposed zoning reforms.
- DPIE to provide clarity regarding how the BTR SEPP will be applied to the proposed employment lands.

Retain the retail hierarchy and provide for certainty

The Camden LGA includes a unique network of centres that range in size, scale and function. A retail hierarchy is contained within the LSPS and draft CELS which provides long term direction and certainty for the development industry and the community.

There is a risk that the reform may undermine Council's strategic planning framework and create uncertainty for the community and the development industry.

Recommendation:

- DPIE to apply the reforms consistently with the adopted retail hierarchy for the Camden LGA.
- DPIE to confirm if other existing controls, such as building heights, will remain unchanged as a result of these reforms.
- DPIE to ensure that the reform will not delay or defer planning proposals or development applications.



Ensure legibility and consistency

The naming of the new zoning framework must be consistent and legible. There could be confusion between the naming of the existing Environmental zones and proposed Employment zones, particularly as both SEPP and LEP Environmental zones are currently referenced as E1-4.

There is also potential resource implications for Council to ensure the new naming is reflected in other planning documents (e.g. the Development Control Plan) and systems.

Recommendation:

- DPIE to ensure the new zoning framework is consistent and legible.
- DPIE to ensure that councils have adequate resourcing to update other planning documents and systems.

Ensure local businesses and landowners are adequately consulted

The proposed reforms are significant and will require extensive community consultation. Council advocates for ongoing communication with Camden businesses and landowners during the public exhibition period.

Recommendation:

- DPIE to ensure ongoing communication with Council as part of the implementation process.
- DPIE to ensure local businesses and landowners are adequately consulted during the public exhibition period.



Conclusion

Council supports the broad intent of the proposed Employment Zones Reform to maximise productivity and address barriers within the planning system that limit the ability of businesses to establish, expand or adapt. We look forward to collaborating with DPIE to address the key issues outlined in this submission.

Summary of Recommendations

DPIE to:

1. Collaborate with Council to identify potential land use conflicts and to mitigate unintended consequences.
2. Ensure timeframes have a greater degree of flexibility included to allow for detailed collaboration with Council
3. Collaborate with Council to translate the reforms into the Camden LEP.
4. Clarify the relationship of the reform with the Building Business Back Better' project and re-exhibit both proposals concurrently.
5. Provide Council with further information as to how these reforms may be expanded to apply to the Sydney Region Growth Centres SEPP, noting that greenfield areas require specific zonings to ensure that character, scale and function can be formed over time.
6. Retain existing prohibited residential accommodation development types as part of the proposed zoning reforms.
7. Provide clarity regarding how the BTR SEPP will be applied to the proposed employment lands.
8. Apply the reforms consistently with the adopted retail hierarchy for the Camden LGA.
9. Confirm if other existing controls, such as building heights, will remain unchanged as a result of these reforms.
10. Ensure that the reform will not delay or defer planning proposals or development applications.
11. Ensure the new zoning framework is consistent and legible.
12. Ensure that councils have adequate resourcing to update other planning documents and systems.
13. Ensure ongoing communication with Council as part of the implementation process.
14. Ensure local businesses and landowners are adequately consulted during the public exhibition period.