

From: [REDACTED]
To: [DPIE_PA_SS Employment Zones Mailbox](#)
Subject: [REDACTED]
Date: Friday, 16 July 2021 3:01:01 PM
Attachments: [image001.png](#)
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Hi [REDACTED]

Further to the emails below, I have now consulted with Councillors and can confirm that below is our finalised submission. [REDACTED]

City of Parramatta Council Submission – Employment Zones Reform

The objectives of the employment zones reform to encourage and enable economic recovery, growth and employment are supported. However there is a general concern regarding how the reforms would be implemented to ensure the transition to new zones does not take place without due consideration of the potential impacts on existing permissibility and built form controls. Furthermore, while the NSW zoning system has become standardised it still allows Councils to adopt a degree of tailoring of their local environmental plans to support their particular strategic objectives. Locally prepared provisions will need to be carried over into the introduction of the new employment zone framework, potentially making implementation complex, costly and time-consuming.

The NSW Government is also currently consulting with local government across a range of planning reforms, and in this context Council staff are concerned at how the new employment zones and land use definitions will integrate and coordinate with other planning reforms – including changes to the Complying Development provisions of State Environmental Planning Policy (Exempt and Complying Codes) 2008 (Codes SEPP) and industrial lands. In this respect the proposal to implement changes to the Codes SEPP ahead of the broader employment zones reform is considered premature. It is unclear what unintended risks may eventuate by making changes to the Codes SEPP relative to particular zones only to have those zones altered under the broader employment zone reforms.

Consequently further detailed analysis is needed to identify and assess the implications for existing land uses within the new employment zones, for example initial concern is raised in respect of potential increased permissibility in currently zoned areas such as the Local Centre zone and related potential impacts on residential amenity. Other issues arising relate to the definition of Neighbourhood Shop being expanded by reference to activities that meet “day to day needs”. This test would be vague and ambiguous, with potential impacts on residential amenity – typically noise, odour, traffic, parking.

For the proposed new employment zone framework to take effect an amendment to the Standard Instrument Principal LEP Order will be required and all LEPs will need to be updated. This has the potential to raise major resourcing challenges for Council as current planning staff are already fully engaged on a range of important strategic planning projects aimed at supporting the recovery of our local economy from the Co-vid 19 pandemic. The Department has indicated that it will support councils during this process, and that Councils will have sufficient time to review the proposed translation into the new framework and will be able to make changes to land use tables, mapping, local provisions and schedule additional permitted uses. The Department has also advised that implementation will not require councils to prepare individual planning proposals as self-repealing SEPPs will be prepared and exhibited, with the level of detail necessary to clearly outline and communicate individual LEP amendments and to then make the legislative change to individual LEPs.

The Department has also advised that the implementation approach will be informed by council consultation, and that resourcing capacity will be balanced against the need to complete the reforms quickly to support economic recovery and to minimise uncertainty for local land use planning as zones are a key gateway into the NSW planning system. In this context it will be very important to identify and agree a suitable implementation program for City of Parramatta with the Department that does not disrupt Council's other land-use planning projects. This will also need to take into account resourcing requirements and in this respect Council staff request that the Department provide associated assistance, that can be made available to Council by the Department, including dedicated staff resources to assist with the updating of our LEPs and associated mapping.

Council staff would be pleased to discuss the issues identified in this submission with Department staff with the aim of working towards a smooth and successful transition to the new system.

Please contact me if you require any further information concerning this submission.

Regards

[Redacted signature block]

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I acknowledge the Traditional Owners of the land I work on, the Darug Peoples, and pay my respects to their Elders past and present.

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*****[EXTERNAL EMAIL] Stop and think before opening attachments, clicking on links or responding. *****

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[REDACTED]

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