



30 June 2021

Minister of Planning and Public Spaces  
NSW Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2150

Dear Mr. Stokes

### **Proposed Employment Zones Framework**

The purpose of this letter is to provide Griffith City Council's (Council's) comments on the Employment Zones Reforms presently underway. Council has been involved in key stakeholder working groups regarding the reforms and has provided several place-based comments, ideas and insights, which we hope have been considered.

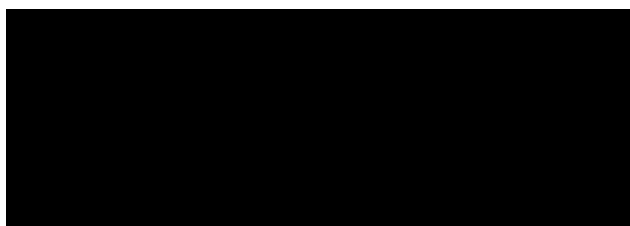
As a medium sized regional Council with a strong and diverse economy, low unemployment and a growing population, Griffith supports new and innovative approaches to zoning and developing employment lands. However, we believe that it is extremely difficult to standardise employment zones across the State when the economies and employment lands in Sydney Metropolitan areas are much different than those in regional areas.

In 2014, Council had issues with transitioning our former LEP zones into the Standard Instrument zones including finding suitable employment zones for our former Rural Industry and Employment zone, Rural Mixed Use Zone and the General Expansion Zone. These zones were well suited to the industry types which were located in certain localities of Griffith. Council is concerned that we will have similar issues now with transferring our eight employment zones into six zones without a clear vision or legislation to support a local activation precinct (Local Enterprise Zone) which could provide place based zoning controls.

Council believes Griffith would be well suited to a local activation or regional jobs precinct and seek the Department's assistance with creating such a precinct moving forward. With relatively unconstrained lands along key transportation routes including our new Southern Industrial Link Road, there are several potential locations for such a precinct, which were identified in Griffith's LSPS. We are actively seeking ways to reduce red-tape and increase the efficiency of the planning process to provide developers more surety in investing in Griffith and the use of complying development and precinct certificates appear to provide a streamlined planning pathway for employment uses that would be welcomed here.

We have provided additional comments regarding the Employment Reform Process in an Appendix to this letter.

Please don't hesitate to contact me to discuss this submission further on [REDACTED]



## APPENDIX 1 – Additional Comments Regarding Employment Zones Reform.

### 1. The Importance of Open Zones

It appears that the majority of the proposed zone typologies are 'closed zones' which restricts the diversity of land uses in general. Council would request that all employment zones be 'open zones'. We believe the open zone approach allows greater flexibility and would cut down on spot re-zonings. The open approach also would permit innominate uses which have not been captured by dictionary definitions but are still appropriate for employment areas.

### 2. The use of the B6-Enterprise Corridor Zone in Griffith

Regional centres generally have two major commercial areas.

#### **Commercial Centre**

The commercial centre forms your traditional 'high street' or main street, which you would refer to as the Central Business District. Retaining these areas as the primary location for social and economic interactions is crucial to the liveability and sustainability of regional centres. Council supports the use of the Commercial Centre zone to protect our Banna Avenue CBD precinct.

#### **Enterprise Corridor**

The other primary commercial area in regional centres provides a commercial entrance to the town supporting a mix of uses which rely on frontage to classified roads, large lot sizes and which support the travelling public. In Griffith, these areas are zoned B6 – Enterprise Corridor. Council does not support the removal of the B6 zone or the following assertion in the Positions Paper:

*The purpose of B6 is unclear, lacking in strategic clarity. Land use activities commonly found in areas zoned B6 are generally classified as urban support or mixed use.*

This statement may be true for Metropolitan Council's, but it is not true for regional centres. There is definite strategic clarity for the B6 zone in Griffith. We seek the retention of this zone as the proposed "Productivity Support Zone" does not achieve the same objectives or mix of uses as the B6 Zone.

### 3. Employment Lands Strategy

Council is presently carrying out an Employment Lands Study to open up additional employment lands in Griffith as envisioned in our Local Strategic Planning Statement and mixed use areas in accordance with our Housing Strategy. As part of the zone translation process, is there also the ability to rezone additional lands? This is not made clear in the Employment Zones Framework Implementation Plan. Council would seek to utilise this process to realise the recommendations of our Local Strategic Planning Statement and Employment Lands Strategy.

### 4. Mixed Use Zones

In regional centres with relatively large sites in mixed use areas there is potential for well sited and designed single storey mixed use areas with commercial premises and services fronting the arterial roads and residential uses at the rear. Council would like to ensure that residential uses in mixed use zones are not restricted to only shop-top housing.