



Draft Employment Zones Reform

Council Submission – 30 June 2021



Acknowledgement to Country

Byron Shire Council recognises the traditional owners of this land, the Bundjalung of Byron Bay, Arakwal people, the Widjabal people, the Minjungbul people and the wider Bundjalung Nation.

We recognise that the most enduring and relevant legacy Indigenous people offer is their understanding of the significance of land and their local, deep commitment to place.



Overview

Byron Shire Council welcomes the Department's commitment to supporting a productive economy by enabling business and jobs in the locations where they are needed and delivering on the communities' strategic vision for their state.

The suite of employment zone reforms seeks to deliver a framework that is fit for purpose, supports productivity and jobs growth while facilitating delivery of strategic plans and planning priorities. However, there are concerns about how the reforms will impact on regional councils if rolled out too hastily and without adequate implementation funding for local councils. To this end the following comments are provided.

BSC Comments

- **Proposed employment zone labels**

There seems to be a deliberate decision to use the exact same alpha-numeric environmental zone labels that already exist in most council LEPs, with no explanation as to why this was done and what councils' existing E zones will be replaced with. This only creates unnecessary confusion (and mistrust) for councils, businesses, and the wider community, all of which could be easily avoided by applying a new "T" Zone (Trade zone) or "EM" Zone (Employment zone) instead.

If applying a new "T" or "EM" Zone is not an option, then the NSW government should rename all existing E zones in the SI LEP to "Biodiversity" zones and relabel with a 'B' prefix.

- **Zone objectives**

All proposed zones

In thinking to the future, the following objectives should apply to all proposed employment zones:

- *To enable our employment areas to be smarter, greener and more productive.*
- *To support community wealth building (CWB) enterprises*

CWB is a people-centred approach to local economic development, which redirects wealth back into the local economy, and places control and benefits into the hands of local people. Byron Shire's currently work in developing Lot 12 in Bayshore Drive Byron Bay could be seen as an example in case.

FYI: <https://www.gov.scot/policies/cities-regions/community-wealth-building/>

E1 Local Centre

Suggest also including the following objectives:

- To maximise public transport patronage and encourage walking and cycling.
- To promote vibrant and active street frontages (ie. equally important to smaller centres)

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E2 Commercial Centre

- There is disconnect between the zone terminology and that contained in the North Coast Regional Plan (NCRP). Proposed E2 wording should have a connection to NCRP terms such as *regional centre* (ie. Lismore) or *strategic centre* (ie Ballina). This also recognises that primary trade area influences can extend beyond LGA boundaries.
- Also suggest E2 objectives should reinforce the overall centre identity and build on the language used in Regional Plans such as the NCRP, for example:
distinctive character, accessibility and vitality making them hives of economic opportunity.
..... play a significant role within the regional economy as a centrepiece for employment activities
- The absence of *shop-top housing* as a permissible land use is inconsistent with 4th objective of this zone and doesn't reflect for needs of most 'regional' commercial centres. Recommend including *shop-top housing* in E2 Commercial Centre Zone

E3 Productivity Support – zone objectives

- **3rd objective:** *To provide for land uses that are compatible with, but do not compete with, land uses in surrounding local and commercial centres*

Use of words “do not compete” is difficult to define and could be used by a third party to appeal and hinder a development in order to maintain an economic advantage/monopoly; suggest use of the term ‘undermine’ as a centre can still complete and complement another centre.

- **6th objective:** • *To enable limited retail uses to meet the day to day needs of workers or to sell goods of a large size, weight or quantity or goods manufactured on-site*

There are too many messages in this objective with conflicting intent. Suggest breaking up into two separate objectives for clarity.

E4 General Industrial – zone objectives

This is missing a key objective that should apply to any industrial zone, being:

- *To support and protect industrial land for industrial uses*

Without this objective, there remains a significant risk that over time this land will be lost to higher order uses that can occur elsewhere.

- **Other proposed SI LEP changes**

- **P7 – items [6] – [10]** : It's unclear why “*Local distribution premises*” would be inserted as a permissible land use in any of these environmental/waterway zones. This must be an oversight as Council can see no planning justification to support such a change.

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- **Practical support and financial assistance for implementation**

The Draft Employment Zones Framework Implementation Plan proposes delivery in 2 tranches. Although the Plan provides a visual overview of the key stages and timing for each tranche, together with a more detailed table of actions and responsible agencies, there's no indication of how the Department will support the additional engagement that local councils inevitably need to undertake with those affected by the proposed zones. Funding the resourcing impacts on local councils needs to be included as a key action in the Plan.

Also, the Implementation Toolkit to guide the translation of existing zones into the new employment zones framework really should have formed part of the reforms package currently on exhibition. Given the importance of the Toolkit to councils' implementation of these reforms, this information really should have been available now for public feedback, and not released at such a late stage of the process.

Thank you for the opportunity to provide input to the draft Employment Zones Reforms package.

If you require any further information, please do not hesitate to contact me by email

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