

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPIE PA SS Employment Zones Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Employment Zones Reform
Date: Wednesday, 30 June 2021 5:14:05 PM

Submitted on Wed, 30/06/2021 - 17:13

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

████

Last name

████

I would like my submission to remain confidential

No

Info

Email

████████████████████

Suburb/Town & Postcode

██████████

Submission

Thank you for the opportunity to review the proposed Employment Zone Reform. We support the intent of simplifying zoning and providing a more flexible and streamlined planning framework.

However, we note the following aspects we believe need further consideration prior to finalisation and implementation of the reform.

1. Retain option for Light Industrial zone

- The proposed employment zones framework does not include a Light Industrial zone (generally merging IN1 and IN2 Zones into the E4 General Industrial Zone).
- This is considered problematic where seeking a transition or buffer between industrial land uses and nearby residential land uses. AlburyCity has relied on the IN2 Zone in strategic locations to achieve these outcomes across the Albury LGA. Existing transition and buffers will be diminished by the proposed reforms.
- We note the option to adopt a different zone (e.g. Urban Support or Mixed Use) where IN2 currently exists. However, from a preliminary review, this is not straight forward and neither of these alternate zones appears to be appropriate and could create unintended consequences (e.g. greater use of Urban Support or Mixed Use zones may result in more business/retail land uses in the former 'Light Industrial' areas creating potential land use conflicts and potentially undermining existing CBD areas).
- The considerable change from a Light Industrial zone to General Industrial zone is also anticipated to create concern from nearby residents. In particular, this is foreseen for areas in our LGA recently rezoned to IN2 on the basis of 'Light Industrial' zoning and land uses (not 'General Industrial'). Also refer below noting need for assistance in consultation processes.
- Consequently, it is recommended that that an exclusive Light Industrial Zone be retained.

2. Tangible planning assistance – Employment Lands Strategy

- The proposed reforms appears to assume all Councils have an existing Employment Lands Strategy. For example, page 16 of the Position Paper states:
"In the review of which is the appropriate zone for industrial precincts, councils should be guided by their employment lands strategy and how that aligns to the strategic intent of the proposed zone."
 - Many regional Council's, including Albury, do not have such a strategy.
 - Tangible planning assistance (e.g. funding and resources) should be provided to assist Councils with limited internal resources to prepare such a strategy to appropriately inform implementation of this reform.
 - We note the following from page 21 of the Position Paper:
"We are investigating options to provide tangible planning support; however, there is limited capacity to give funding directly to councils. Utilising a flying squad of policy planners engaged by the State and deployed to councils to undertake the detailed review work is being considered"
- Noting the tight implementation timeframe proposed, these options need to be promptly explored and agreed with Councils.
- These reforms could require significant local investigation and analysis (especially in the absence of an existing employment lands strategy)
- A lack of local resources is considered a significant risk and may lead to poor translation of zones. Without appropriate consideration and analysis these translation may result in negative planning outcomes or unintended consequences that do not achieve the intent of the reform.

3. Tangible planning assistance – Consultation

- Likewise, tangible planning assistance (e.g. funding and resources) should be provided to assist regional Councils in local Consultation processes.
- Again, we note the following from page 21 of the Position Paper:

"We are also considering options to provide communications and engagement assistance to support public exhibition and consultation with communities and recently elected local government officials. "

- Noting the tight implementation timeframe proposed, these options need to be promptly explored and agreed with Councils.
- These reforms can mean significant changes that requires corresponding and suitably robust engagement processes. Regional Council's with limited resources will require practical assistance in preparing consultation materials and engaging with affected communities.

4. Minor clarifications

- The proposed employment zones naming (E1-E5) creates confusion with the existing environmental zones (E1-E4) – consider alternate naming/reference.
- The proposed E3 zone appears to be referred as both "Urban Support" and "Productivity Support" in different parts and documents.

I agree to the above statement

Yes