

29<sup>th</sup> June 2021

Attn: Director Employment Zones

NSW Department of Planning, Industry and Environment

Email: [employment.zones@planning.nsw.gov.au](mailto:employment.zones@planning.nsw.gov.au)

**RE: Submission to Employment Zones Reform – Primewest Ltd.**

We write on behalf of Prime West Limited in the lodgement of a submission to the Employment Zones Reforms which is currently on exhibition. Primewest are a publicly listed property business with a substantial portfolio of Industrial, Retail and Commercial Property Assets across Australia.

We commend the employment zone reforms currently being undertaken by the Department. These reforms are critical to ensure the zones remain current and flexible to adapt to the changing employment and business practices. We understand the Greater Sydney Commission current review of the “retain and manage” industrial lands policy is directly related to the employment zones reform. To this end we believe it is critically important to have a simple pallet of flexible zones which can be easily applied to ensure employment and industry activities can change and prosper over time.

Many of Sydney’s older Industrial areas are in a state of flux and need a flexible approach to employment land uses if they are to change, grow and prosper. The proposed E3 Productivity Support zone offers a flexible range of uses whilst the proposed E4 General Industry zones less so. The only defined used which are not permissible E3 vs E4 is General Industry and Freight transports Facilities.

The Proposed Employment Zones Framework Position Paper states the E3 zone “Essentially replaces B5 Business Development, B6 Enterprise Corridor, some B7 Business Parks and in exceptional circumstances limited areas of IN2 Light Industrial zones that no longer function as traditional industrial precincts.” And the E4 zone “generally replaces IN1 General Industrial and IN2 Light Industrial zones”. Given several locations in metropolitan Sydney have IN1 industrial zoned areas which are adjacent to centres and no are longer suitable for the larger General Industry uses (which should be located on major arterials or multi



modal locations), consideration should be given to allowing the **E3 zone to replace IN 1 General Industrial zone in exceptional circumstances also.**

A good example of an area suitable for E3 in part is the Brookvale industrial estate. This area is primarily IN1 zoned land with a wide range lot sizes and uses. It is scattered with Business Premises which were approved when Business Premises were a permissible use under the Warringah LEP. It also has antiquated, sometimes derelict and underutilized industrial buildings which are in need of renewal. It is adjacent to the Brookvale town centre, partly surrounded by residential, and has poor heavy vehicle access. The Draft Brookvale Structure Plan prepared by Northern Beaches Council, identifies the need for such flexibility of land use in the location.

Brookvale is just one example of where a flexible approach should be considered and request the State give flexibility to Councils to replace IN1 zone with E3 zones in exceptional and worthy situations.

We trust the above is satisfactory for your consideration however should you require any clarification on the matters raised do not hesitate to contact the writer via email on [REDACTED]

Yours sincerely,

[REDACTED]  
J W Evans Projects P/L

CC : [REDACTED]