

30 June 2021

Attention: Director Employment Zones
NSW Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124
(by email)

Dear Sir/Madam

Employment Zones Reform

As the developer of existing employment and business zones at Oran Park, and as the developer of future employment and business zones under planning in the Camden local government area, we have a vital interest in the reform of the Standard Instrument relating to employment zones. We recognise that as employment land uses and areas change and adapt, there may need to be corresponding changes in the nature, description and scope of the planning framework which supports them.

The documentation released by the Department explaining the reasons for the changes to the Standard instrument, their expected scope and the pathway to implementation is clear. What is less clear is how these proposed changes will interact with planning proposals currently underway in existing business or industrial zones.

We have two planning proposals on foot for our existing and employment zones. These are:

- An expansion of the Oran Park Industrial Area, rezoning 11 hectares of vacant residential land adjoining The Northern Road to permit General Industrial land uses and adding a small number of additional permissible land uses to the Industrial Area and
- An expansion of Oran Park Town Centre (rezoning residential land to compensate for land lost to the reservation of the Metro rail corridor and proposed Metro station at Oran Park) and allowing additional building height at strategic locations in the Town Centre.

As soon as these planning proposals are concluded (and assuming the changes foreshadowed in the planning proposals are gazetted) we and/or future land users will be lodging development applications to take advantage of the changed planning framework. These applications are for “real” uses and new tenants/owners, reflecting the strong and growing demand for employment land at Oran Park.

We want to ensure that the nuanced approach we have carefully planned with Camden Council for new land uses in Oran Park’s employment areas via each of these planning proposals is not unintentionally undermined by the amendments to the Standard Instrument and the self-repealing SEPP being prepared by the Department to implement the employment zone reforms. In particular, the draft documentation that was exhibited makes no specific mention of the inclusion of Savings and Transition provisions in either the revised Standard Instrument or the self-repealing SEPP.

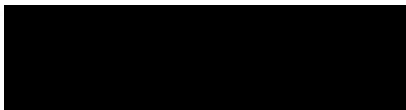
Whether the Department intends to include such provisions in the self-repealing SEPP should be clarified. We note some recent SEPPs have been gazetted without these provisions (eg. *SEPP (Major Infrastructure Corridors) 2020*), even though savings and transition provisions may have been helpful for dealing with applications which were under consideration at the time of gazettal.

Furthermore, the exhibited material requires clarity about the impact, if any, of the foreshadowed planning processes and statutory instrument amendments on the *SEPP (Sydney Region Growth Centres) 2006*. Over time, the multitude of instruments at State and local government level which apply in the Growth Centres have led to a multilayered planning framework. The foreshadowed amendments to simplify the employment zones should not exacerbate this situation.

We note that the explanatory documentation alludes to a “tailored” approach for each Council area and this gives us some confidence that our current planning proposals will not be de-railed by the employment zones reform being led by the Department. However, we have experienced a six-month (and counting) delay to exhibition of the Pondicherry rezoning brought about by the Department’s decision to hand planning responsibility for this area back to Council last year. The delay is due principally to additional process steps the Council must now follow, and not by any missteps on Council’s part, however, we are uncertain if the Department had identified this delay as a possible risk arising from that decision. We are very keen to avoid any similar delays or process uncertainty because of this current process, given the status of our current planning proposals.

Thank you for the opportunity to make this submission. We would be pleased to discuss any aspect in greater detail if required. Initially, this may be done by contacting me on [REDACTED].

Yours sincerely,

A large black rectangular redaction box covering the signature of Stephen Driscoll.

Stephen Driscoll
Senior Development Manager
Greenfields Development Company No. 2 Pty Ltd