

ATTACHMENT L

Employment Zones Translation Paper

CITY PLANNING

Comprehensive Planning Proposal Employment Zones Translation

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Introduction

This paper provides an overview of the State Government's employment zone reforms and outlines implications and recommendations for Randwick City's employment zones under the final Comprehensive LEP. The reforms entail an overhaul of the existing Standard LEP Instrument employment zoning framework, including substantially reducing the number of existing employment zones, expanding permissible uses, and updating a number of land use terms to reflect emerging industries

The employment zone reforms were recently exhibited as part of the draft Comprehensive Planning Proposal (draft CPP), including potential options for the translation of existing employment zones under the *Randwick Local Environmental Plan 2012* (RLEP 2012) into the new framework.

This paper provides a contextual analysis of land use zoning of Randwick City's employment zones and considers suitable zoning, land use permissibility and potential issues for consideration for the final comprehensive planning proposal, underpinned by community feedback received during the public exhibition.

Existing Context

Employment zones under the RLEP 2012 comprise land use zoning for business centres and industrial areas across Randwick City.

Business centres under the RLEP 2012 currently fall within one of two Standard LEP Instrument zones, namely the B1 Neighbourhood Centre zone and the B2 Local Centre zone.

The B1 Neighbourhood centre zone applies to smaller neighbourhood centres that are located within local residential neighbourhoods. These centres play an important role in servicing the day to day needs of residents in walkable catchments and generally comprise 2-3 storey shop top housing developments with shops, restaurants and cafes on the ground floor. There are currently 30 B1 Neighbourhood centres located across the Randwick City LGA. In addition to these, the draft CPP proposes to rezone 20 existing clusters of shops from residential to the neighbourhood centre zone to reflect existing land use and character.

The B2 Local Centre zone applies to larger town centres that provide a wider range of retail, business, entertainment and community uses that serve the needs of people who live, work and visit the local area. B2 Local centres serve a greater catchment than neighbourhood centres, have a larger mix of uses and employment options, and generally have access to frequent public transport services. Centres that are zoned B2 Local Centre under the RLEP 2012 include the town centres of Kensington, Kingsford, Coogee, Matraville, Randwick Junction and Maroubra Junction.

Industrial zoned land in Randwick City is confined to a small precinct adjacent to Port Botany which is zoned IN2 Light Industry under the RLEP 2012. This precinct supports a diverse range of operations from small local industries to larger scale international manufacturing and logistic and port related industries. The Port itself is unzoned under the RLEP 2012 as development is controlled and managed under the provisions of the SEPP (Transport and Infrastructure) 2021.

The following map shows the location of zoned employment land cross Randwick City.



Figure 1: Location of Randwick City's employment lands.

Employment Land Profile

The following section provides a brief overview of the profile of Randwick City's employment lands, followed by an analysis and recommendations of the employment zone that would best fit the existing and desired character.

LOCAL CENTRES

Randwick City currently has 6 centres which are zoned B2 Local Centre zone under the RLEP 2012. These centres generally serve a wider catchment, have a wide mix of uses and access to frequent public transport services. A brief summary of Randwick City's local centres is provided as follows. Approximate non-residential floor space data has been obtained from the SGS Economic Development Study 2021.

Randwick Junction

Randwick Junction town centre straddles Belmore Road, Avoca Street and Alison Road, and is the only town centre in Randwick City that wholly comprises a heritage conservation area. It contains a number of significant heritage items and contributory buildings which represent key development periods, particularly from the 1890s and the art deco period in the 1930s.

Building stock comprises mostly 2-4 storey shop top housing with a diverse mix of ground floor land uses including retail, commercial and medical uses which service the Randwick Hospitals Campus, University of NSW and surrounding residential area. The centre contains two shopping centres, multiple bank branches, a post office and one of Randwick City Council's libraries. In 2019 the centre possessed 67,487m² non-residential floorspace.

Randwick Junction is strategically located within the Randwick Strategic Centre which is defined in A Metropolis of Three Cities as a health and education precinct and also as a collaboration area. The Strategic Centre contains a cluster of institutions and centres including the University of NSW, Randwick Hospitals Campus and the surrounding town centres of Kensington to Kingsford. It is well served by public transport including the Sydney CBD to South-East Light Rail which terminates on High Street, as well as frequent bus services to the city. Randwick Junction is currently subject to a separate planning review process which will look at opportunities for ensuring adequate commercial floor space is available to meet the needs of the Strategic Centre.

Kensington and Kingsford Town Centres (K2K)

The Kensington and Kingsford town centres (referred to as K2K) are focused along Anzac Parade, and contain a mix of commercial, retail and hospitality businesses on the ground floor with residential above. The centres fall within the Randwick Education and Health strategic centre and have strong synergies with the University of NSW and Randwick Hospitals Campus.

Both centres were subject to a comprehensive planning review over 2016-2018 which resulted in changes to the maximum height and FSR for most sites together with substantial community infrastructure and public realm upgrades. The new planning provisions provide for buildings ranging from 9-16 storeys in height including landmark development in strategic locations which provide additional commercial floor space, and community infrastructure. Both K2K Centres are well serviced by Sydney CBD to East Light Rail with the alignment route running along Anzac Parade and terminating at the Kingsford terminus at Kingsford Junction.

In 2019 the K2K centres combined had 100,808m² of non-residential floor space. This is likely to increase with further redevelopment of strategic node sites which provide a 1:1 non-residential FSR to meet projected employment floor space needs.

Coogee Town Centre

Coogee town centre is a vibrant and active seaside village lying at the base of the Coogee basin. It is bounded by Alfred Street to the north and Waltham Street to the south with most of the commercial area focused along Coogee Bay Road and Arden Street.

The centre accommodates around 46,560m² of non-residential floor space, with a substantial component accommodating large scale hospitality premises, including the Coogee Bay Hotel, Beach Palace, and Crowne Plaza Hotels. Local retail services make up the majority of the remaining floor space including a supermarket, green grocers, delis, banks and post office. Coogee has a thriving day and night time economy with its commercial strength linked to the seasonal nature of the beach and coastal attractions, while it still remains relatively busy in cooler months.

Coogee Beach is the terminus of a number of bus routes to key employment nodes including the Sydney CBD, Bondi Beach and East Gardens. Given the age of much of the commercial and residential development in the area, most parking is street based rather than on private land.

Matraville Town Centre

Matraville town centre is located in the southern part of Randwick, and focused on Bunnerong Road between Beauchamp Road, Perry Street and Franklin Street. The centre adjoins Bayside Council and is in close proximity to Port Botany. The town centre services the southern residential areas of Randwick, as well as Port Botany and surrounding industrial land.

Matraville centre is located a short drive away from major retail centres, including Westfield Eastgardens, Southpoint Shopping Centre, Eastlakes and Pacific Square at Maroubra Junction, and as a result, struggles from this competition.

The centre has around 28,793m² of non-residential floor space, accommodating a range of specialty services, including medical centres, specialist health services, pharmacies, a bank, primary school and an animal hospital. In addition to these services, the centre also has numerous restaurants, cafés and entertainment options with the Matraville Hotel and the Matraville RSL Club being landmark uses. Transport and connectivity to public transport is reasonably available in with four bus routes linking the centre to Port Botany, Little Bay and the Sydney CBD.

Maroubra Junction

Maroubra Junction town centre is located at the intersection of Anzac Parade and Maroubra Road, towards the southern part of the LGA. It has a strong local population serving role offering retail, health and community services.

Maroubra Junction has the highest proportion of non-residential floor space (99,415m²) for a single centre in Randwick City, providing for a wide mix of commercial, retail and residential uses including major supermarkets, specialised retail, banks, post office and the largest of Council's three libraries. The centre's retail formats are focused on Pacific Square shopping centre as well as on-street strip shopping along Anzac Parade and Maroubra Road.

In addition to commercial uses, the centre is characterised by large scale residential development which provides a strong customer catchment supporting the centre's functions. The centre is characterised by its wide central reserve (approximately 60m) which is utilised as public open space and parking.

The centre forms part of the Maroubra Junction East Gardens strategic centre which falls within both Randwick City and Bayside LGAs. Investigation of the current and potential future economic and social roles of the combined centre, and implications for land use and transport planning will be undertaken in 2023 including identifying a cohesive economic role that unifies Eastgardens and Maroubra Junction as a stand-alone centre given these centres currently operate independently with contrasting place qualities, mix of uses and roles within the local community.

Maroubra Junction is well served with frequent bus services to employment nodes including the Randwick Strategic Centre and the Sydney CBD.

NEIGHBOURHOOD CENTRES

Randwick City has a substantial amount of neighbourhood centres which cater to a more locally orientated economy. These centres generally range from intimate dining precincts (eg The Spot, Frenchmann's Road), to beachside villages (e.g Maroubra Beach, Malabar and La Parouse) and smaller clusters of shops. In recent decades, many of these smaller centres have developed to incorporate a mix of housing, retail and commercial uses together with recreational opportunities.

Smaller centres make a significant contribution to enhancing local amenity by meeting the convenience needs of the local community. They provide important community hubs but face strong competition from nearby larger centres. One of the characteristics of traditional neighbourhood centres —as opposed to malls or 'big box' shopping facilities—is that smaller shopping strips often have a distinct identity and offer services on a more intimate level. This form of retailing promotes contact between shopkeepers and shoppers/local residents and creates a more personal shopping experience. A brief summary of Randwick City's neighbourhood centres is provided as follows:

Maroubra Beach

Maroubra Beach neighbourhood centre is centred on Marine Parade and McKeon Street and has a relaxed beachside village character. The commercial area is a small strip of shops along Marine Parade and McKeon Street, opposite the Maroubra Beach foreshore and promenade. The centre contains an ambulance station, hotel, club and a variety of restaurants, cafes and small retail and businesses premises accounting for around 26,765m² of non-residential floor space.

Maroubra Beach centre has had little urban renewal, apart from the pub and a few new mixed use buildings. The commercial viability of the centre is strongly influenced by the seasonal nature of the beach and coastal uses. The centre is relatively well serviced by public transport with bus services to employment centres via Randwick or Maroubra Junction to the Sydney CBD, Bondi Junction and Eastgardens.

The Spot

The Spot is a small scale neighbourhood centre in the North of the Randwick LGA a short walk east of the UNSW campus towards the southern end of Belmore Road. It falls within The

Spot Heritage Conservation Area which also includes the surrounding residential neighbourhoods.

The Spot functions as a hospitality destination, offering a lively eating and drinking experience as well as a range of other activities such as the Ritz Cinema, and health care support services. The centre has around 17,289m² of non-residential floor space.

Frenchman's Road

Frenchman's Road neighbourhood centre is situated at the junction of Frenchman Road and Clovelly Road in North Randwick. The centre is anchored by a Bunnings Warehouse located in the centre of the corridor and comprises a cluster of retail, commercial and hospitality businesses that generally serve the local neighbourhood. The centre has around 5,897m² of non-residential floor space.

Clovelly

The Clovelly neighbourhood centre comprises a small group of shops located on Clovelly Road leading towards Clovelly Beach. The centre has a role in providing hospitality and other store-based retail offerings to the surrounding neighbourhood. Clovelly neighbourhood centre currently has around 8,164m² of non-residential floor space.

OTHER NEIGHBOURHOOD CENTRES

In addition to the aforementioned neighbourhood centres, the following clusters of shops are currently zoned B1 Neighbourhood Centre under the RLEP 2012:

- Moverly/Malabar Rd, South Coogee
- Malabar Rd, Maroubra (Lurline)
- Maroubra South
- Botany St, Kingsford
- South Coogee
- West Randwick
- Lexington Place, Maroubra
- Malabar
- Shirley Cres, Matraville
- Duffys Corner
- Canara Ave, Phillip Bay
- Chifley
- Nix Ave, Malabar
- Little Bay
- Snape St, Kingsford
- La Perouse
- Maroubra Road West, Maroubra

In addition to these, the following clusters of shops/businesses that are currently zoned residential are proposed to be rezoned to neighbourhood centre under the exhibited Planning Proposal to reflect existing land use and character:

Cluster	Addresses
Gardeners Road Cluster: KINGSFORD	<ul style="list-style-type: none"> • 118 Gardeners Road • 120-122 Gardeners Road • 124 Gardeners Road
Todman Avenue Cluster: KENSINGTON	<ul style="list-style-type: none"> • 57 Todman Avenue • 59 Todman Avenue • 61 Todman Avenue
Anzac Parade Cluster: MAROUBRA	<ul style="list-style-type: none"> • 627 Anzac Parade • 629 Anzac Parade • 61 Todman avenue
Bunnerong Road Cluster: MAROUBRA	<ul style="list-style-type: none"> • 167 Bunnerong Road • 169 Bunnerong Road • 169A Bunnerong Road
Malabar Road Cluster: MAROUBRA	<ul style="list-style-type: none"> • 496-504 Malabar Road
Moverly Road Cluster: MAROUBRA	<ul style="list-style-type: none"> • 56 Moverly Road • 58 Moverly Road • 60 Moverly Road
Avoca Street Cluster: RANDWICK	<ul style="list-style-type: none"> • 341-347 Avoca Street
Barker Street Cluster: RANDWICK	<ul style="list-style-type: none"> • 140-142 Barker Street • 144-146 Barker Street • 148 Barker Street
Canberra Street Cluster: RANDWICK	<ul style="list-style-type: none"> • 1 Canberra Street • 3 Canberra Street • 5 Canberra Street • 7 Canberra Street
Canberra Street Cluster: RANDWICK	<ul style="list-style-type: none"> • 16-18 Canberra Street • 20 Canberra Street • 22 Canberra Street • 22A Canberra Street
Carrington Road Cluster: RANDWICK	<ul style="list-style-type: none"> • 33-37 Carrington Road • 48 Carrington Road • 50-54 Carrington Road
Clovelly Road Cluster 1: RANDWICK	<ul style="list-style-type: none"> • 23 Clovelly Road • 29 Clovelly Road
Clovelly Road Cluster 2: RANDWICK	<ul style="list-style-type: none"> • 49 Clovelly Road • 51 Clovelly Road • 53 Clovelly Road • 1 Gilderthorpe Avenue
King Street Cluster: RANDWICK	<ul style="list-style-type: none"> • 101 King Street • 103 Kings Street • 105 King Street

Arden Street Cluster: SOUTH COOGEE	<ul style="list-style-type: none"> • 371-373 Arden Street • 374-376 Arden Street • 378 Arden Street • 99-101 Malabar Street
Malabar Road Cluster: SOUTH COOGEE	<ul style="list-style-type: none"> • 2-4 Malabar Road • 6-8 Malabar Road
Malabar Road Cluster: SOUTH COOGEE	<ul style="list-style-type: none"> • 169-173 Malabar Road • 175-177 Malabar Road
Burnie Street Cluster: CLOVELLY	<ul style="list-style-type: none"> • 17 Burnie Street • 21 Burnie Street • 25 Burnie Street • 27 Burnie Street • 29 Burnie Street • 31 Burnie Street • 37 Burnie Street • 39 Burnie Street • 41-43 Burnie Street • 45-51 Burnie Street • 34 Burnie Street • 36 Burnie Street • 38 Burnie Street • 40 Burnie Street • 42 Burnie Street • 44 Burnie Street • 46 Burnie Street • 48 Burnie Street • 50 Burnie Street
Beach Street Cluster: COOGEE	<ul style="list-style-type: none"> • 98-104 Beach Street
Dudley Street Cluster: COOGEE	<ul style="list-style-type: none"> • 63A Dudley Street • 65-73 Dudley Street • 19-23 Havelock Avenue

Employment Zone Reforms

Background

In November 2020 the State Government announced a review of the Standard LEP Instrument employment zone framework. The reforms are intended on supporting productivity and jobs growth, by simplifying the number of employment zones within the Standard LEP Instrument, providing greater clarity about their application, as well as more flexibility around permissible land uses.

The review is timely given the Standard LEP Instrument has been in effect for 15 years, and the nature and operation of business in NSW has seen considerable changes, some of which has been exacerbated over the course of the Covid 19 pandemic. These include the growth of online retailers, increased reliance on freight and logistics services, flexible working from home arrangements, greater use of local shops and services, and multi-use businesses.

A Discussion Paper was released in May 2021 for public comment which proposed several changes, namely:

- Reducing the number of existing employment zones available under the Standard LEP template from 12 to 5 zones;
- Expanding land use permissibility within the proposed new employment zones; and
- Introducing new and updated land use definitions to reflect up to date and emerging business trends.

Key aspects of the proposals particularly relevant to Randwick City include:

- The consolidation of the B1 Neighbourhood Centre and B2 Local Centre zones into a new E1 Local Centre zone together with a number of new mandated uses including amusement centres and vehicle repair services. The hierarchy and intensity of the centres would be defined through tailored objectives and development standards;
- Consolidating the IN1 General Industrial and IN2 Light Industrial zones into a new blanket E4 General Industrial zone in addition to a number of new mandated uses that are currently not permitted under the IN2 Light Industrial zone under the RLEP 2012 (e.g. freight transport facilities and general industries).

- The introduction of new definitions for:
 - Circular economic facility: a facility that allows for the collection, repair, refurbishment, dismantling, sharing and redistribution of goods commonly found in households
 - Creative industry: a new catch all definition for creative industries and their activities and outputs, including occupations such as traditional and digital media, fine arts and crafts, design and creative products and
 - Data centre: a building used for the collection, storage, process and distribution of electronic data.

Final Standard Instrument Framework for Employment Zones

In May 2022, the Government released the final framework for the Standard Instrument employment zones. All local environmental plans across NSW which rely on the Standard LEP Instrument are now required to be updated with the new employment zone framework.

The new framework comprises the following five employment zones:

- E1 Local Centre
- E2 Commercial Centre
- E3 Productivity Support
- E4 General Industrial and
- E5 Heavy Industrial

The Local Centre and Commercial Centre zones represent zoning for centres; the General Industrial and Heavy Industrial are the key industrial zones; and Productivity Support provides a transition between the centres, industrial and other zones.

To accommodate land uses in existing B or IN zones that are not primarily productivity related, three further zones have also been proposed under the reforms:

- MU1 Mixed Use
- W4 Working Waterfront
- SP4 Enterprise

Each zone has mandatory objectives, and permitted and prohibited land uses prescribed by the Government. Council is able to supplement these with additional objectives to suit the local context, and can specify additional land uses which are permitted and prohibited within a certain zone.

It is important to note that although the employment zones are changing, the built form of development would continue to be determined by development standards such as height and FSR under the new LEP, as well as setbacks, building separation and landscaped area provisions under the Randwick Development Control Plan 2013 (DCP 2013). In other words, the change in zoning terminology would have no impact upon the height and scale of development within our centres.

The Government has undertaken a translation approach to existing centres across NSW and has pre-determined the employment zones for the majority of councils generally focusing on the best fit and placing recommendations on public exhibition over May/June 2022. However given the progress on the draft CPP, Council has been permitted to determine the employment zones for Randwick City, within the new framework.

The following table provides an overview of the characteristics of each new standard employment zone and a brief comment on the suitability of the zone being applied to the Randwick City context.

Zone	Summary Description/ Strategic Intent	Desired Characteristics	Replaces	Comment
Employment Zones				
E1 Local Centre	<p>To provide centres of all sizes and scales that offer:</p> <ul style="list-style-type: none"> • a diversity of retail, business, office, community, accommodation and entertainment uses to the community • a focus for active vibrant communities to come together • employment opportunities in accessible locations • where available, a focus for public transport 	<ul style="list-style-type: none"> • Commercial focus, either as offices, retail and business premises or mix of uses • A range of uses and services commensurate to the size of the centre • Entertainment and dining options, tourist and visitor accommodation, after hour uses, community and social infrastructure. 	B1 Neighbourhood Centre and B2 Local Centre zones	Proposed to be used – The B1 zone is the only available zone to replace the existing B1 Neighbourhood Centre zones and would be suitable to cover some B2 Local centres.
E2 Commercial Centre	<ul style="list-style-type: none"> • Provides for large-scale commercial, retail, business and compatible associated uses like community uses, recreational and health care services. • Emphasises a centre’s business and employment focus. • Supports council community facilities to create a central community hub (e.g. with 	<ul style="list-style-type: none"> • Commercial focus for a district and/or regional catchment, including full-line supermarket(s), entertainment and dining options • Tourist and visitor accommodation • Public transport, particularly in metropolitan areas • Out-of-business hour uses/night-time economy • Clusters community and social infrastructure, such as government services, 	Replaces the commercial core zone and some B2 Local Centres. Nb: There is no commercial core zoned business centre under the RLEP 2012.	Proposed to be used – The B2 Commercial Centre zone would be appropriate for some larger centres in Randwick City that provide a substantial amount of commercial floor space, a mix of businesses, community hubs, a thriving night time economy and which are well serviced with public transport nodes.

	<p>main libraries, community and cultural facilities and council offices).</p> <ul style="list-style-type: none"> • Supports an area's night-time economy. • Avoids mandating residential uses although higher density residential may be appropriate in some areas so long as the primary employment focus is preserved. 	<p>medical centres and childcare</p>		
E3 Productivity Support	<p>To provide land and floor space for:</p> <ul style="list-style-type: none"> • a range of urban or rural services that cater to and support the local population and businesses • businesses not suited to a centre location • industries and activities that are lower on the land value hierarchy than retail and commercial office uses 	<ul style="list-style-type: none"> • Land and floorspace responds to local business needs • Fine grain and/or large format employment • Mix of specialised, niche or trade focused retail, including business focused retail • Mix of light industrial, office, infrastructure and other urban services uses • Capability to service the needs of local workers with food and drink, convenience retail and child care • Low impact creative and emerging industries 	<p>Replaces B5 Business Development and B6 Enterprise Corridor B7 Business Park</p>	<p>Not applicable. This zone is generally reserved for business parks containing uses requiring larger floor plates and generally does not support residential uses.</p>
E4 General Industrial Zone	<p>To provide suitable land and floor space for a range of industrial activities</p>	<ul style="list-style-type: none"> • General and light industries, warehousing and supporting businesses • Complementary uses including office 	<p>Generally replaces IN1 General Industrial and IN2 Light Industrial zones.</p>	<p>Proposed to be used- the E4 General Industrial zone is the most suitable zone to replace the IN2 Light Industrial zone. It would accommodate a range of light, general industrial and warehousing uses and allow for ancillary uses to meet workers; daily needs.</p>

		<p>(associated with industrial), auto-related industry (excluding sales), large format indoor recreation, artisan food and drink</p> <ul style="list-style-type: none"> • Capability to service the needs of local workers • Access to arterial roads and freight routes • Diversity of lot sizes, with capability to support a mix of fine grain and large format industrial uses 		
E5 Heavy Industrial	<ul style="list-style-type: none"> • To provide suitable areas for industries that need to be separated from other land uses • To minimise the impact of heavy industry on other land uses • To protect land suited to heavy industries 	<ul style="list-style-type: none"> • Capability to support hazardous or offensive industry and storage with buffers to sensitive receivers • Capability to support depots, warehousing and storage premises that support heavy industry • Physically separate from other higher amenity land uses • Good access to arterial roads and freight routes • Large lot as required by safety and amenity 	Replaces IN3 Heavy Industrial zone and potentially some IN1 General Industrial zones	Not applicable. There are no IN3 Heavy Industrial or IN1 General Industrial zones in Randwick City. Development within Port Botany will continue to be managed under SEPP (Transport and Infrastructure) 2021.

None- Productivity Related Zones				
MU1 Mixed Use	<ul style="list-style-type: none"> • Supports a mix of residential, retail, light industry and tourist accommodation. • Supports genuine mixed use development rather than one dominant use. • Promotes and encourages activities at ground floor and on street fronts. 	<ul style="list-style-type: none"> • Activities at ground floor and on street fronts • Differentiation between a centre and urban support areas in a mix of zones to manage the impacts of out of centre development • Well-designed mixed use developments are vibrant and support community needs 	Replaces B4 Mixed Use, some B2 Local Centres. Nb There are currently no mixed use zoned areas under the RLEP 2012	There is potential to apply the MU1 zone to centres or areas that transition between centres and residential neighbourhoods where a genuine mix of uses may be sought.
W4 Working Foreshore	<ul style="list-style-type: none"> • To provide suitable protections for working waterfront areas that are adjacent to waterways 	<ul style="list-style-type: none"> • Manage land use conflicts and environmental protections of waterways 	Replaces IN4 Working Waterfront Zone.	Not applicable. There is no equivalent working waterfront zone in Randwick City. The intention of this zone is to ensure a direct translation of the IN4 Working Waterfront Zone which is part of the zone grouping of waterways and generally does not apply to employment zones.
<ul style="list-style-type: none"> • SP4 Local Enterprise 	<ul style="list-style-type: none"> • To support unique areas that require tailored land use planning 	<ul style="list-style-type: none"> • Supports precinct planning where a specific enterprise outcome is sought beyond the strategic intent of another zone • Unique precincts with an enterprise focus 	Application for limited existing developed or partially developed areas where development does not meet the strategic intent and/or objectives of any of the new zones (e.g. parts of the B8 Metropolitan Centre in the City of Sydney LGA or large planned commercial office parks)	Not applicable. This zone is reserved for planned precincts/special activation precincts that cannot be accommodated in other zones. The zone only applies in unique and predetermined circumstances subject to meeting strict established criteria and Department endorsement and wide use not expected at the commencement of the new framework.

Proposed Employment Zones for Randwick City

Overview of Submissions

The proposed employment reform framework was publicly exhibited alongside the comprehensive planning proposal from 30 May until 12 July 2022. This provided the community and stakeholders with the opportunity to consider the draft CPP holistically, including potential new employment zones tailored to the Randwick City context.

Key issues raised in submissions include:

- General support for the application of the E1 Local Centre zone to Randwick Junction;
- Opposition to the merging of the B1 Neighbourhood Centre and B2 Local Centre zones into the E1 Local Centre zone on the basis of amenity concerns for local residents;
- Opposition to the translation of the IN2 Light Industrial zone to E4 General Industrial on the basis that it would attract freight companies, trucks, noise, and pollution; and
- Support for the retention of the Matraville Industrial Estate as industrial land and the proposed translation from IN2 Light Industrial to E4 General Industrial in line with the Employment Zone Reforms,

The submissions have been analysed with responses provided in Attachment 1 to the Council report.

The following section provides an analysis of implications of the proposed zone translation and recommendations for inclusion in the Final Comprehensive LEP.

Translation of the B1 Neighbourhood Centre Zone to E1 Local Centre Zone

As highlighted earlier in this paper, centres zoned B1 Neighbourhood Centre and some B2 Local Centres are to be merged into a new E1 Local Centre zone, including objectives and permissible/prohibited land uses. This means that all existing neighbourhood centres in Randwick City will be translated into the E1 Local Centre zone under the new LEP.

Aside from the E1 Local Centre zone, there are no other employment zones that would provide a suitable fit for our existing neighbourhood centres, which are generally small clusters of shops servicing a neighbourhood catchment. For instance, the E2 Commercial Centre zone is generally reserved for larger centres with substantial commercial floor space, greater mix of uses and which are well served by public transport nodes. The E3 Productivity Support zone is generally reserved for business parks/ sites with larger floor plates. Moreover, the MU1 Mixed Use Centre zone is provided for centres or transitional areas where a genuine mix of uses is sought (including light industry) (e.g., Waterloo in the City of Sydney).

The E1 Local Centre zone is considered to be the most suitable zone for the neighbourhood centres for the following reasons:

- The proposed mandated objectives for the E1 Local Centre zone generally align with the RLEP 2012 objectives for the B1 Neighbourhood Centre zone. These core objectives are proposed to be supplemented with more localised objectives

reflecting the character, mix of uses, local service catchment, as well as sensitive zone interface considerations;

- The majority of mandated permissible uses under the E1 Local Centre zone generally align with the RLEP 2012 B1 Neighbourhood Centre zone. It is important to note, however, that the zone translation process would result in a number of new permissible uses (with development consent) due to either the merging of the B1 and B2 zones (resulting in permissible uses under the B2 Local Centre zone being permissible in neighbourhood centres by default), or uses that are mandated in the E1 Local Centre zone under the Standard LEP instrument (see discussion under *E1 Local Centre Zone -Land Use Permissibility Issues*);
- The centre hierarchy between neighbourhood centres and local centres would continue to be reinforced via:
 - Development standards (e.g., maximum height and Floor Space Ratio) which set the appropriate scale of development to maintain existing and/or desired future character. The maximum height limit and FSR for existing neighbourhood centres are considered appropriate and thus recommended to be retained under the comprehensive LEP with no change; and
 - A new local provision for proposals requiring consideration of existing character and retention of the fine grain character of development located within neighbourhood centres.

Refer to **Appendix A** for the proposed E1 Local Centre zone objectives and land use table.

Translation of B2 Local Centre Zone to E1 Local Centre Zone

The existing B2 Local Centre zones in Randwick City comprise a variety of centres of different scales, intensities, mix of uses and service catchments. These include:

- Randwick Junction town centre
- Matraville town centre
- Coogee Beach town centre
- Maroubra Junction
- Kensington town centre; and
- Kingsford town centre.

The reforms provide the opportunity to consider alternative employment zones for certain B2 Local Centres that may be a better fit and reflect the desired future character and strategic intent for these centres. Potential options for our B2 Local Centres include:

- E1 Local Centre zone
- E2 Commercial Centre zone or
- MU1 Mixed Use Centre zone.

The following section outlines the preferred E1 Local Centre zoning option for a number of B2 Local Centre zoned centres.

Matraville Town Centre

The Matraville town centre is an evolving centre that services the local catchment and is currently in transition with high vacancy rates for commercial development. It is currently subject to a public domain study which will guide Council upgrades to the public domain to help the centre prosper and create better places for people to shop, and socialise. The plan will include public domain elements such as new or improved pedestrian and cycle connections, new public spaces, new tree plantings, improved street furniture and footpaths.

The planning controls for the town centre are also due for review, with the last comprehensive study of the centre undertaken in 2006. Pending a future study where the zoning of the centre would be examined holistically in conjunction with land use mix, densities, transport planning and public realm works, it is recommended that Matraville town centre translated to the E1 Local Centre zone including existing development standards with no change.

Coogee Town Centre

Coogee is a vibrant and active seaside village which has evolved to have a clear hospitality focus and thriving night-time economy. Given its hospitality and retail focus, Coogee town centre is not envisaged to accommodate an intensity of use of residential floor space. It is recommended that Coogee town centre be translated to the E1 Local Centre zone with current development standards for the following reasons:

- The E1 Local Centre is a direct translation of the existing B2 Local Centre zone and would have comparable objectives and permissible land uses;
- Coogee town centre has a clear fine grain village character and supports a centre that is smaller than the E2 Commercial Centre in the centres' hierarchy;
- The centre provides a range of retail, business, entertainment and community uses that serve the needs of people who live, work or visit the local area; and
- Although it is serviced by frequent bus services, Coogee does not have a significant public transport node that would support a larger catchment.

E1 Local Centre Zone - Land Use Permissibility Issues

As noted above, the new E1 Local Centre zone would result in a number of new additional land uses being permitted in neighbourhood centres, subject to development consent from Council. These new uses are either mandated uses under the new E1 Local Centre zone, or, are a result of the merging of the B1 Neighbourhood Centre and B2 Local Centre zones into the new E1 Local Centre zone, thus carrying across permissible uses under the B2 Local Centre zone across to neighbourhood centres. The most notable of these are discussed as follows:

Amusement centres (mandated use under the new E1 Local Centre zone)

Amusement centres are a source of entertainment and recreation and are principally used for the playing of mechanical or electronic amusement machines and/or pool tables. They are currently not permitted in the B1 Neighbourhood Centre zone, however, will be permitted under the new E1 Local Centre zone as a mandated use.

The RDCP 2013 (Section D9) contains a number of provisions to guide the location, design and activities of amusement centres, to minimise adverse amenity impacts on the site and immediate locality. These include acoustic provisions, requirements for Management Plans to address patron behaviour and noise, and trial periods on trading hours to monitor the ongoing management of a premises and its impact on amenity and public safety.

Permitting amusement centres (with development consent) in existing neighbourhood centres is unlikely to be a significant issue for Randwick City given their decline due to changing technology, reduced consumer demand and growth of home gaming. Moreover, any proposal for an amusement centre would be subject to the DA process where the aforementioned DCP provisions on amenity and sound management would apply.

Commercial premises (result of the merging of B1 Neighbourhood Centre and B2 Local Centre zones):

‘Commercial premises’ is an umbrella term covering retail premises, office premises and business premises, and is permitted with development consent in the B2 Local Centre zone. Although commercial premises as a group term is not permissible in the B1 Neighbourhood Centre zone, the subset land uses of office and business premises are permitted with development consent, whereas retail premises are prohibited.

The merging of the B1 Neighbourhood Centre zone and the B2 Local centre zone into the E1 Local Centre zone would result in ‘commercial premises’ being permissible in existing neighbourhood centres. Although this would align with existing permissibility with regards to office premises and business premises, it would also result in retail premises being permissible in existing neighbourhood centres (where it is currently prohibited).

Retail premises is a broad term encapsulating a range of uses including food and drink premises, cellar door premises, landscaping material supplies, plant nurseries, roadside stalls, rural supplies, specialised retail premises, and timber yards. Many of these additional uses are large format premises that would require greater floor plates. Notwithstanding this, it is unlikely that larger format retail would be achievable in the neighbourhood centres, which are generally finer grain with small lot sizes, fragmented ownership patterns and FSR constraints (i.e.: the majority of neighbourhood centres have an FSR of 1:1 which is unlikely to accommodate large format retail). Notably, the proposed local provision on retaining the fine grain character and development pattern of smaller centres would apply for any proposals in neighbourhood centres.

Local distribution premises (mandated use):

‘Local distribution centres’ generally covers premises such as parcel lockers and ‘click and collect’ facilities which have become prevalent since the pandemic and the rise of online shopping. Local distribution centres are currently not permitted in the B1 Neighbourhood Centre and B2 Local Centres as they fall under the definition of ‘warehouse and distribution centre’ which is a prohibited use in these zones.

Under the reforms, ‘local distribution centres’ have been uncoupled from the group term of ‘warehouse and distribution centre’ and are permissible as a mandatory use with development consent in the E1 Local Centre zone. This means that local distribution centres will be permissible in existing neighbourhood centres and local centres under the new Comprehensive LEP.

Local distribution centres are unlikely to be a significant issue for Randwick City’s business centres given the fine grain scale of existing neighbourhood centres and the general requirement for greater floor space to accommodate this type of use which would be limited by the LEP FSR provisions.

Restricted Premises (result of merging of B1 Neighbourhood and B2 Local centre zones)

Restricted premises refer to business premises or retail premises, which, due to their nature, restrict access to patrons over the age of 18 and includes sex shops but does not include sex services premises (i.e. brothels) and the like. Restricted premises are currently permissible within consent in the B2 Local Centre zone, however prohibited in the B1 Neighbourhood centre zone.

The merging of the B1 Neighbourhood Centre zone and the B2 Local Centre Zone into the E1 Local Centre zone would result in restricted premises being permissible (with development consent) in existing neighbourhood centres. Restricted premises are unlikely to be problematic due to the largely online nature of this use and would be subject to strict merit assessment under the DA process.

Section D14 of the DCP 2013 contains a raft of provisions to ensure that both sex services premises and restricted premises are well located, designed and managed to avoid adverse impacts on the surrounding area. These include requirements for separate entries, the location of such premises above the ground floor, privacy and noise provisions and restrictions on the display of material on windows, doors and public areas.

The RLEP 2012 includes a model provision on sex services premises which does not apply to restricted premises. The provisions cover proximity to sensitive land uses and anti-clustering. As Model LEP provisions generally cannot be amended, it is recommended that the DCP provisions be further strengthened for restricted premises to address proximity to sensitive land uses and anti-clustering and this be further investigated as part of the DCP comprehensive review.

Tourist and Visitor Accommodation (result of merging of B1 Neighbourhood Centre and B2 Local Centre zones)

Tourist accommodation is broad term encompassing backpackers' accommodation, bed and breakfast accommodation, farm stay, hotel or motel accommodation and serviced apartments. Tourist accommodation is permitted with consent in the B2 Local Centre zone. Although tourist accommodation is prohibited in the B1 Neighbourhood Centre zone, the subset land uses of 'hotel and motel accommodation' and 'bed and breakfast' are permissible with development consent.

The merging of the B1 Neighbourhood Centre and B2 Local Centre into the E1 Local Centre zone would result in a range of tourist accommodation types being permissible with development consent in neighbourhood centres including 'backpackers' accommodation', 'serviced apartments' and 'farm stay accommodation. The following matters are considered with respect to permissibility of tourist accommodation in the new E1 Local Centre zone:

Backpackers Accommodation

Backpackers' accommodation provides short term accommodation on temporary basis generally with shared facilities such as communal bathrooms, living areas, kitchen and/or laundry. They are often located in areas that are highly frequented by tourists such as coastal areas, night life precincts and/or where there are a high level of services, facilities and amenity. Randwick City currently has 3 approved backpackers accommodation premises located in Coogee, and Clovelly.

If designed and managed well, backpackers' accommodation can provide an important source of short-term accommodation to meet tourism needs. They add to the diversity of accommodation options for visitors and can contribute positively to the local economy.

Conversely, if not managed appropriately, backpackers accommodation can potentially have adverse amenity impacts such as anti-social behaviour and noise. As such, section D10 of the DCP contains a number of provisions to ensure that backpacker's accommodation is appropriately located, provides high quality accommodation for occupants and is suitably managed to minimise any adverse amenity impacts on the locality in which they are situated.

Provisions focus on design requirements for the premises, management plan requirements and minimum acoustic and privacy requirements. The inclusion of backpackers' accommodation as a permissible use with consent within existing neighbourhood centres is unlikely to be problematic for the following reasons:

- The market for backpackers' accommodation is in decline with the rise of Air bnb and other short term accommodation options. This is reflected by anecdotal evidence from Council's Compliance and Regulatory Department which notes a substantial reduction in complaints about existing backpacker accommodation premises;
- Backpackers' accommodation is a type of short term accommodation premises which is subject to a three-fold regulatory framework threshold including:
 - Requirements for hosts/operators to be subject to a formal Mandatory Code of Conduct administered by the NSW Fair Trading;
 - Mandatory registration of premises being used for short term accommodation; and
 - Mandatory minimum fire safety standards.
- Randwick City's planning framework contains a raft of provisions to ensure that applications for backpackers' accommodation are rigorously assessed under a merit-based process. Any proposal for a backpacker's premises would thus be subject to the LEP and DCP backpacker requirements including design, management and amenity.

Serviced Apartments

Serviced apartments refer to a building or part of a building providing self contained accommodation for tourists or visitors on a commercial basis that is regularly serviced by the owner or building manager. They are currently permitted with development consent in the B2 Local Centre zone and R3 Medium Density Residential zone, however prohibited in the B1 Neighbourhood Centre zone. The new E1 Local Centre zone would result in serviced apartments being permissible in neighbourhood centres with development consent.

Development applications for serviced apartments would be subject to relevant LEP and DCP provisions covering built form, amenity and management requirements and would be subject to the aforementioned State Government mandatory regulatory framework.

Farm stay Accommodation

Farm stay accommodation refers to a building or place that provides temporary or short-term accommodation to paying guests on a working farm as a secondary business to primary production. These types of uses occur in rural settings and as such are not relevant to the context of Randwick City.

Translation of B2 Local Centre Zone to E2 Commercial Centre Zone

As per the Government's directions, the new E2 Commercial Centre zone provides for larger scale centres with a mix of commercial, retail, business and other uses such as residential, community facilities and health services which are well serviced with public transport nodes. Residential densities are supported in such centres provided the employment focus is protected.

The E2 Commercial Centre zone is considered an appropriate fit for existing B2 Local Centres which are located in strategic centres as discussed as follows:

Randwick Education and Health Strategic Centre

The Randwick Strategic Centre is defined in A Metropolis of Three Cities as a health and education precinct and also as a collaboration area, where a place based and multi-stakeholder approach is undertaken to solve complex urban issues. The Randwick Collaboration Area contains the cluster of the University of NSW, Randwick Hospitals Campus and the Royal Randwick Racecourse. The B2 Local Centre zoned town centres of Kensington, Kingsford, and Randwick Junction are located within this strategic centre. The Randwick Strategic Centre/Randwick Collaboration Area will generate future demand for more floor space for retail/commercial/medical uses part of which would need to be accommodated in these centres.

Kensington and Kingsford Town Centres

The Kensington and Kingsford town centres (K2K Centres) have been subject to a comprehensive planning review which has identified these centres as employment generators with strong synergies with the University of NSW and Randwick Hospitals Campus.

An E2 Commercial Centre zoning is recommended for the centres for the following reasons:

- New planning controls have been recently implemented to protect the employment focus of these centres. These include provisions to increase the amount of commercial floor space through the introduction of active street frontages provisions on the ground floor of most sites, and the application of a non-residential FSR for strategic node sites;
- The K2K centres are well serviced with public transport including the Sydney to South East light rail and terminus which is a major public transport node for the City and provides direct links to key institutions and the Sydney CBD;
- The K2K centres have strong synergies with key institutions such as the University, TAFE and Hospitals Campus, and as such play a key role in supporting an emerging innovation district centred on these anchor institutions;
- The K2K centres have been earmarked to provide community hubs and innovation space at strategic node sites through gross floor area bonuses, to help stimulate economic activity and the creation of jobs through clustering of start-ups, business incubators and accelerators in a physically compact, accessible urban environment; and
- The centres have been identified as key precincts in which to sustain and enhance the night time economy, catering to the student and key worker population through later trading hours and planning controls which support the establishment of a diverse range of low impact businesses and cultural activities which occur at night.

Randwick Junction

The Randwick Junction Town Centre is located within the Randwick Strategic Centre, in walkable proximity to the cluster of University/Hospital services and facilities. It is largely serviced by the Sydney CBD to South Light Rail network which terminates on High Street as well as a number of bus services.

Randwick Junction is the only centre in Randwick City that wholly falls within a conservation area. As such future growth of the centre, particularly the increase in commercial floor space would need to be sensitively managed to ensure that the heritage significance of sites within the centre and the broader conservation area is respected and not be adversely affected.

Randwick Junction is currently subject to a comprehensive planning process, which includes a recently prepared planning strategy which identifies potential modest height increases on nominated sites, setbacks (for envelope controls), active street frontages, new heritage items, public domain improvements, car parking rates, affordable housing levy and infrastructure contributions. Pending the progression of this planning work and in recognition of the heritage constraints of this centre it is recommended that Randwick Junction be translated to the E2 Commercial Centre Zone together with existing development standards.

Maroubra Junction-East Gardens Strategic Centre

The Eastgardens-Maroubra Junction Strategic Centre is a newly identified strategic centre straddling both Randwick and Bayside LGAs. It comprises Maroubra Junction town centre and Eastgardens in the Bayside Local Government Area, including the British American Tobacco Factory site, Eastgardens Westfield and Maroubra Road as a key link between the centres. This strategic centre has been identified for future growth in employment, housing and services and as such is subject to a comprehensive strategic review in 2023 to determine appropriate residential densities and employment focus.

Maroubra Junction Town Centre

The Maroubra Junction town centre has a strong local population serving role offering retail, health and community services.

The proposed Maroubra Junction- East Gardens study would provide the opportunity to holistically consider an appropriate zoning for Maroubra Junction town centre, together with development standards, urban design and transport considerations. Until such time that the future economic role of this combined centre and implications for land use and transport planning are determined, it is recommended that Maroubra Junction town centre be translated to the E2 Local Centre zone together with current RLEP 2012 development standards to the new LEP. This would be consistent with the proposed zoning of Eastgardens shopping centre under the Bayside LEP.

E2 Commercial Centre Zone - Land Use Permissibility Issues

The translation of the B2 Local Centre zone to the E2 Commercial Centre zone would result in a number of land uses being permissible with development consent that are currently not addressed within the current planning framework. These are discussed as follows:

- **Local distribution centre:** as noted earlier, 'local distribution centres' are a new stand alone land use that is mandated in the E1 Local Centre and E2 Commercial Centre zone.
- **Artisan food and drink premises:** these premises refer to a building or a place where the principal purpose is the making or manufacture of boutique, artisan or craft food or drink products. The premises must also include retail, a restaurant or café or facilities for holding tastings, tours or workshops. Artisan food and drink premises is a mandatory use in the E2 Commercial Centre zone (with development consent) and is considered to suitably align with the desired future character of the strategic centres as vibrant, commercially focused precincts that support innovation and creativity with a diverse mix of uses and activity and a thriving night-time economy. Any applications for an artisan food and drink premises would be subject to a merit based assessment process where potential amenity impacts would be assessed.

- **Mortuaries:** The E2 Commercial Centre zone mandates ‘mortuary’ as a permissible use with development consent, however it is prohibited in the B2 Local Centre zone. A mortuary refers to premises that are used for the receiving, preparation, embalming and storage of bodies of deceased persons pending their interment or cremation. They are defined separately to a ‘funeral home’ which comprise premises which arrange, conduct and cater for funerals and memorial services, whether or not the premises include facilities for the short-term storage, dressing and viewing of bodies of deceased persons. Mortuaries are generally associated with hospitals or forensic units and therefore are unlikely to be constructed as a stand alone use in the town centres.

Refer to **Appendix A** for the proposed E2 Commercial Centre zone objectives and land use table

MU1 Mixed Use

The reforms have introduced a new MU1 Mixed Use zone which may be used to complement the existing hierarchy of centres in Randwick City. Rather than being productivity focused, the MU1 Mixed Use zone is intended for centres or areas where there is a genuine mix of land uses including light industry, rather a dominant use. Examples of areas that are proposed to be zoned MU1 Mixed Use zone include Green square/ Waterloo, Redfern and Woolloomooloo in the City of Sydney, and Crows Nest in North Sydney.

Although many of Randwick City’s centres have evolved from traditional retail centres to mixed use centres (with retail/commercial on the ground and residential above), it is not recommended to utilise the MUI Zone at this point in time for the following reasons:

- The outcomes of a mixed-use centre are readily achievable under the E1 Local Centre and E2 Commercial Centre zones through the objectives and proposed land use mix;
- The E1 Local Centre and E2 Commercial Centre zones give priority to business uses while allowing a range of other uses. Applying these employment zones would ensure the continued importance and priority of businesses and reflect the strategic intent of our centres as a focus of employment and productivity;
- The comprehensive planning proposal is not seeking to introduce major changes in respect to business zonings and permitted uses in our commercial centres – it seeks primarily to transfer existing planning provisions, where these are already operating suitably, into the new employment zone framework. Any significant changes to centres (including zoning which departs from the strategic intent of the centre) would be identified during detailed town centre planning/design reviews; and
- There is potential to investigate the suitability of the MU1 Mixed Use zone for residential areas surrounding town centres which provide an important economic role in supporting the economic function of town and strategic centres. This would align with the Randwick Housing Strategy (Priority 3) where a key action is to review the zoning and planning controls to ensure a suitable transition/buffer area around town and strategic centres. It is noted that this further study would require a comprehensive analysis of the suitability of the MU1 Mixed Use zone in the context of the range of uses that would be permitted with development consent, including light industry (covering creative industries, high tech and artisan food and drink premises), local distribution centres, seniors housing, and vehicle repair services.

Industrial Zones

Existing Light Industrial area

Randwick has 11.74 hectares of Light Industrial (IN2) zoned land which is strategically located in the southwest area of the local government area (LGA) adjacent to Port Botany. Land within the Port Botany industrial area comprises large lots accommodating logistics, freight, container storage and other port related activities. This land is zoned under the Three Ports SEPP (Chapter 5 State Environmental Planning Policy Transport and Infrastructure 2021).

Figure 1 shows the location of the Light Industrial zoned area which is bound by low density residential land (zoned R2) to the west and south and the border of the adjoining Bayside LGA which is zoned IN1 under the Infrastructure and Transport SEPP 2021.



Figure 2: IN2 light industrial zoned land (purple)

The industrial area is serviced by Beauchamp Road which is a State Road to the north which is a major east west arterial road linking Port Botany with other State Roads frequented by

heavy vehicles. Perry Street is a local road that services the Industrial IN2 area from the south and forms the interface with the adjacent residential areas to the east and southwest.



Figure 3: Light industrial complex, 133-137 Beauchamp Road, Matraville

Ports SEPP Area

Port Botany is located immediately to the west and southwest of the Randwick IN2 zone and the adjacent IN1 General Industrial within the Bayside LGA. Port Botany and an area surrounding the Port is zoned under the Transport and Infrastructure SEPP 2021 (previously Three Ports SEPP).

Port Botany, Port Kembla and the Port of Newcastle are three of the state's largest ports, consequently the three ports are recognised as state significant precincts due to their importance to the NSW economy. The SEPP provides a consistent planning regime for the three ports and outlines the rules and controls for land-use and appropriate development. These controls aim to promote the efficient development and operation of the ports, further supporting their contribution to the State's economic activity.

Port Botany was leased to a private operator NSW Ports in 2013. The lease area is surrounded by lands maintained for port related an industrial use under the General Industrial IN1 zone. Local Environmental Plans do not apply to the land covered by the SEPP.

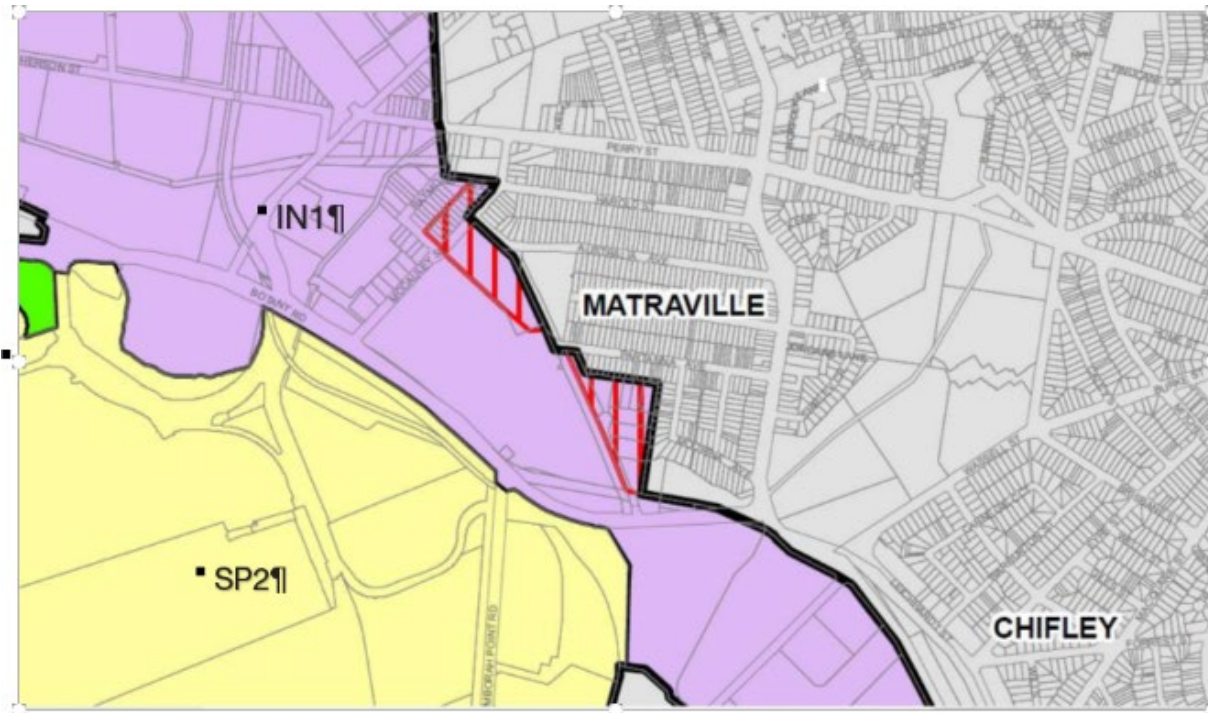


Figure 4: Transport and Infrastructure SEPP 2021 Port Botany Zoning

The objectives of this Ports SEPP IN1 General Industrial zoning include:

- To provide a wide range of industrial and warehouse land uses
- To facilitate and encourage port related industries that will contribute to the growth and diversification of trade through the port.
- To enable development for the purposes of business premises or office premises associated with, and ancillary to, port facilities or industries

This zoning permits:

- freight transport facilities,
- general industries,
- Light industries
- Office premises
- Vehicle repair stations.
- warehouse or distribution centres; and
- waste or resource management facilities.

Given that most of the Ports IN1 zoned areas are on large lots and are serviced by state and regional roads, these areas have been planned for, and are more suited to, the requirements large scale freight transport logistics facilities required in the vicinity of the Port Botany trade gateway.

Furthermore, these SEPP zoned IN1 are sites generally located at a greater distance from residential areas than the existing Randwick IN2 industrial area and trucks accessing these sites do not need to travel on local roads. In this context, the existing Randwick IN2 industrial area currently prohibits freight transport logistics facilities. This industrial area needs to maintain its role as a buffer between the Ports SEPP Area and the adjacent low density residential area. Council submitted a request to the Department of Planning that the mandated use of freight transport facilities be removed from the E4 General Industrial zone for the Randwick LGA. It was advised that the removal of mandated uses would not be

supported by Parliamentary Counsel. Consequently, to minimise the impacts of freight transport development on surrounding sensitive residential zoned areas Council is proposing to introduce a local provision that will prohibit any freight transport facilities from operating within 150m of any residential zoned land.

Land Use Context

Randwick City makes an important economic contribution to the Eastern City District and Greater Sydney. Port Botany, located across Randwick and Botany LGAs, is a trade gateway for the CBD and the nation, surrounded by industrial land and port facilities.

The industrial zoned land surrounding the port provides for both industrial, manufacturing, and warehousing uses, as well as for urban services, which include car repair, equipment hire and waste management.

Council is committed to protecting this small but significant industrial area from non-conforming uses (retailing, offices, and other business activities) by supporting a diverse range of industries and employment opportunities whilst ensuring the traffic and environmental impacts are minimized.



Figure 5: Beauchamp Road light industrial complex.

Eastern City District Plan

The Eastern District Plan identifies Port Botany as an International trade gateway and a freight hub for the State.

Retaining the current capacity and growth of these gateways will help maintain their competitive advantage over interstate ports. Preventing the encroachment of sensitive uses that can impact on their operations, such as residential and commercial, and ensuring good transport networks is of national significance.

Port Botany is the freight hub for the State and is a major focus of the NSW freight network. Internally within the District, freight moves between the gateways of Sydney Airport and Port Botany to Sydenham, the Cooks River Intermodal Terminal, and the Enfield Intermodal Logistics Centre.

The District Plan provides the following directions for trade gateways and industrial areas:

- Planning Priority E9. Growing international trade gateways
- Planning Priority E12. Retaining and managing industrial and urban services land

Greater Cities Commission Industrial Lands Policy Review

The Greater Cities Commission (GCC) has recently initiated a review of the Industrial and Urban Services Lands Retain and Manage policy (the Policy). The Review responds to Recommendation 7.5 of the NSW Productivity Commission's 2021 White Paper *Rebooting the Economy* r outlines a new productivity reform agenda for the State aimed at rebooting our productivity growth following the economic impacts of the COVID pandemic. This approach to the preservation of industrial land within the Sydney metro area is supported under the Greater Sydney Region Plan - A Metropolis of Three Cities.

This review identified that the Eastern City industrial lands perform a variety of functions of both local and regional significance. Proximity to key infrastructure, particularly Port Botany continues to make the Eastern City an important location for NSW supply chains, and freight and logistics with the highest rate of customers (and interactions) from other Districts.

As a result, wholesale trade, and logistics and warehousing continue to dominate, though residential growth pressures remain strong. Increasing population density has also been a driver of increased urban services, retail, and recreation uses on industrial lands. Given the proximity to customers, this District is likely to retain a warehouse and logistics focus, with the potential for the development of localised last mile delivery facilities.

The Commission will finalise and implement the draft Guiding Principles in the Six Cities Region Plan and City Plans expected at the end of 2023.

Council supports the retain and manage approach to Industrial Lands Policy given the industrial lands proximity to the Port Botany gateway. However, given the proximity of Randwick's IN2 area to residential areas, a further consideration should be taken into account, namely that, the nature of industrial activities in any future E4 zone replacement needs to be limited to light industrial in nature and not wholly general industrial as this is largely catered for in the adjacent Ports SEPP area.

Randwick's Local Strategic Planning Statement

In March 2020 Randwick City adopted a Local Strategic Planning Statement (LSPS) which provides the framework for land use planning and decision making over the next 20 years.

The LSPS provides clear planning priorities about where housing, jobs, infrastructure, and open space should be located, and actions for delivery of these priorities.

The Randwick LSPS includes a planning priority 13 to *Retain and manage industrial and urban services lands*. Under this planning priority several actions were identified to assist in delivering this priority:

- 13.1 Retain and manage the industrial and urban services zoned lands in Randwick City – ongoing
- 13.2 Advocate for additional noise attenuation requirements on peripheral lands in the Port Botany area to provide a buffer to neighbouring residential lands – short term
- 13.3 Review LEP 2012 to ensure it can accommodate new and emerging industries in the IN2 Light Industrial zone – short term
- 13.4 Support and manage the freight and logistics task within the City while also protecting the urban – ongoing

Randwick Economic Development Studies 2019 and 2021

The Randwick Economic Development Study, prepared in 2019 by SGS Economics, examines the role, function, and character of our local and neighbourhood centres, including current land use and vacancies. The Study examined the LGA's diverse range of centres, including the town centres, a range of neighbourhood centres, and the industrial areas in Matraville.

This study identified that retaining industrial lands for the provision of urban services will be critical due to the limited land currently available. In 2021 Randwick Council commissioned SGS to complete a Randwick Economic Development Study Update to analyse the impact of the COVID pandemic on the local economy and to have a renewed look at economic development approaches and actions to support local businesses and the local economy.

The Randwick Economic Development Strategy 2022

The Randwick Economic Development Strategy identifies key actions to develop and support local businesses and tourism and promote economic activity across our town, retail and commercial centres and industrial sectors.

The Randwick Economic development strategy identifies Port Botany and adjacent industrial land also provide the gateway for goods to be delivered to and from the Sydney community, and beyond. With its proximity to Sydney city centre and Sydney Airport, Randwick City is an integral part of a globally connected city.

The strategy includes Action 3.5 Undertake a strategic review of industrial land by 2026 to ensure current levels are effectively managed and retained.

Port Botany Interface

The interface of the Port Botany precinct with residential land uses presents ongoing challenges associated with the operations of the Port and its impact on the amenity of neighbouring residential areas. Given its location, the IN2 Zone acts as a buffer between the Port and the residential area.

Residential amenity impacts

The residential area adjoining the IN2 zoned area is impacted by operational noise, noise from truck movements, safety and other amenity impacts from the adjacent Port Botany operations. Noise investigations carried out in the residential area adjacent to the IN2 zoned land have identified night-time noise from the Port as a significant impact on residential areas to the northeast of the Port and these noise levels are accentuated by topographic elevation and prevailing winter south westerly wind direction.

Council has been investigating measures to manage the impacts of noise on surrounding residential areas. This has included requiring additional noise attenuation measures on peripheral industrial activities in the Port Botany area to minimise impacts of on neighbouring residential lands. In this context, the IN2 industrial area of Randwick acts as an important buffer zone between the Ports SEPP area and the adjacent sensitive residential areas (R2 zoned land).



Figure 6: Heavy vehicles accessing Port Botany from Botany Road.

The IN2 zoned land should continue to serve as a buffer and transition zone between the Port Botany and associated land use areas with the adjacent residential areas.

Road access

Beauchamp Road is a state road and heavy vehicles are permitted to use this road. Perry Street and Kelly Street are local roads. In 2017, RMS under Section 122 of the Road Transport Act 2013 imposed a maximum load limit of three and a half tonnes on Perry Street in Matraville.

Figure 1: road tonnage limit sign Perry Street



Figure 7: Road tonnage limit sign Perry Street.

The maximum heavy vehicle load limits are intended to minimise intrusions within local roads and encourage heavy vehicles to use state and regional roads. However, enforcement of the tonnage limits creates practical challenges for Council as it requires detailed investigations of non-compliance. As an alternative measure, Council has carried out intersection management measures including configuration to restrict large vehicle access into and out of McCauley Street to prevent trucks awaiting time slots at Port Botany.

Perry Street is the boundary between the existing IN2 area and Low Density Residential R2 to the south. To address this transition between the two land uses and protect amenity, the medium strip on Perry Street is landscaped with trees and other vegetation given its existing generous width to create a visual and noise buffer between the residential areas to the south and the light industrial land uses to the north. This wider vegetated median strip acts to provide both a buffer area as well as a means of limiting the size of vehicles that can enter and exit industrial premises along Perry Street.



Figure 8: Perry Street vegetated medium strip

In addition heavy vehicle movements on Perry Street have been managed via development consent conditions which set limits on the number of articulated vehicles from accessing a new warehouse developments. These conditions have been upheld by Land and Environment Court decisions.

The majority of industrial premises located off Beauchamp Rd are within business parks which allow for more generous vehicular access and movements catering to large trucks and delivery vehicles with dedicated rear loading docks and shared front entrances with dedicated customer/staff parking areas. In contrast, the majority of lots on Perry Street are narrow and lack sufficient lot depth to adequately cater for articulated vehicle access.

Precedence for a light Industrial area as a buffer around the Ports SEPP area

In July 2022, Chapter 5 of the Transport and Infrastructure SEPP introduced IN2 Light Industrial zone in Hale Street Botany to act as a buffer adjacent to the western boundary with the Three Ports SEPP area. This area is shown outlined red in Figure 3 below. The new zoning is in addition to the original Container Depot Prohibition Area measure which were applied to IN1 General Industrial areas that are located immediately adjacent to residential areas.

This IN2 zone objectives include:

- To provide a range of business and light industrial land uses.
- To minimise any adverse effect of industry on other land uses
- To support and protect industrial land for industrial land uses; and
- To minimise conflict between port related uses and land users within adjoining zones

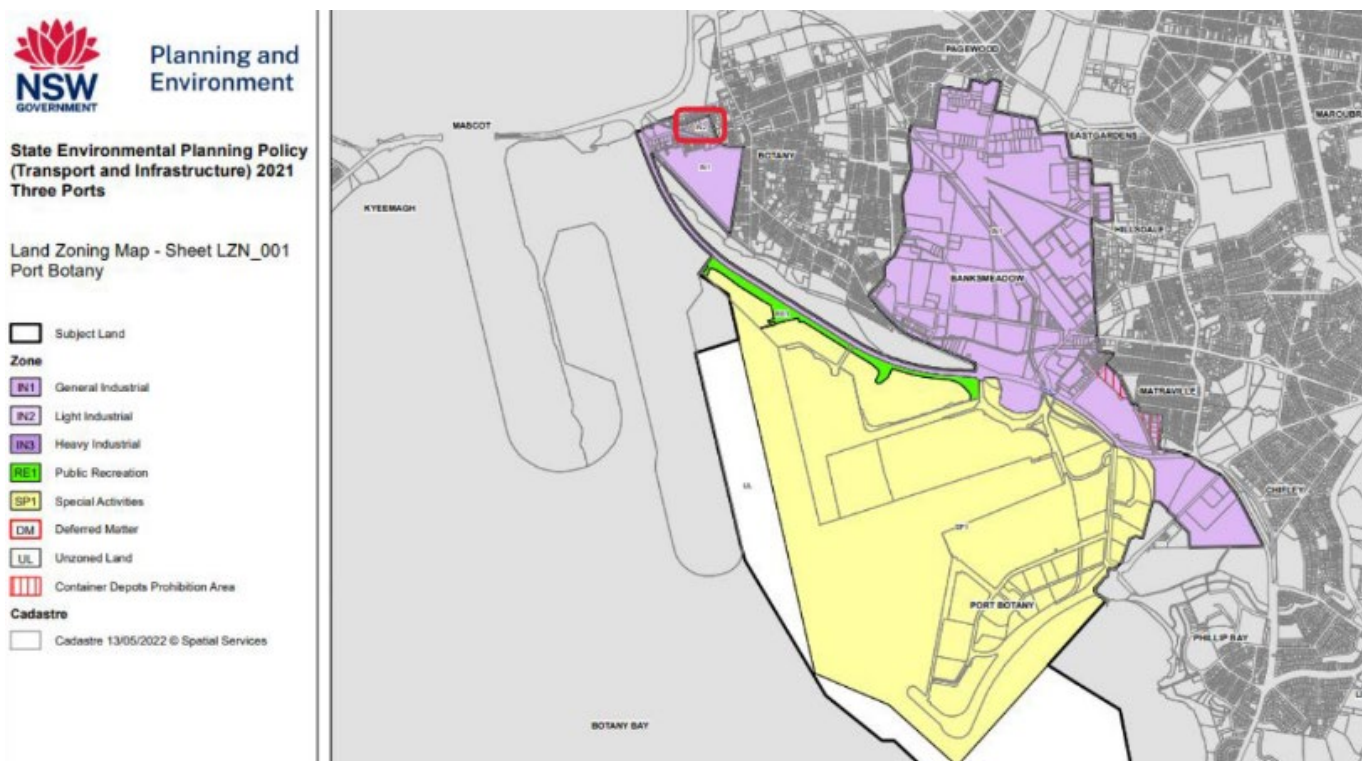
The zone prohibits:

- container depots,
- freight transport facilities and
- warehouse or distribution centres

This Light Industrial zone was introduced in response to Road safety issues relating to freight related articulated trucks traversing this area to and from Port Botany. Additionally, heavy vehicles associated with port related industries have difficulty manoeuvring within the areas due to the narrowness of Hale Street in Botany. A traffic report (prepared by Bayside Council) confirmed this, concluding that the use of heavy vehicles within these identified areas resulted in heavy vehicles turning into oncoming traffic due to inadequate turning paths and resulted in damaging curbs and parked cars.

As such, the introduction of an IN2 Light Industrial zone in the Hale Street area acts as a buffer area between the heavy vehicle reliant Port uses and the adjoining residential areas.

Figure 9: SEPP Land Zoning Map Port Botany



Randwick Light Industrial Area Land use audit

A land use audit was undertaken in 2022 to identify the types of industry that are currently occupying the IN2 zoned land within the Randwick LGA.

The audit identified a number of existing business parks along Beauchamp Road accommodating a combination of manufacturing, wholesale trade, and takeaway food premises. Several click and collect warehouse facilities and a number of repair and maintenance services are also located in this area.

The industrial zoned section of Perry Street includes a number of metal and electronic fabrication services, hardware wholesalers and food catering services.

The audit identified clusters of similar industry types that are operating in the Randwick IN2 area. These are outlined in the table below:

Table 1: Randwick Light Industrial Business Classifications

Business Classifications (ANZSIC)	Percentage	Main business types
Wholesale Trade	41%	<ul style="list-style-type: none">• Grocery Wholesaling- specialised foods• Electrical and Electronic Goods Wholesaling• Hardware Goods Wholesaling
Repair and Maintenance Services	11%	<ul style="list-style-type: none">• Automotive Repairs• Lift repairs and service• Refrigeration equipment repairs and service
Manufacturing	8%	<ul style="list-style-type: none">• Metal fabrication• Structural Steel Fabricating,• Electronic Equipment Manufacturing
Construction Services	7%	<ul style="list-style-type: none">• House construction/renovation services• Building & Design• Plumbing Services

Randwick Light Industrial (IN2) Business Audit - April 2022
 ANZSIC Business Classifications

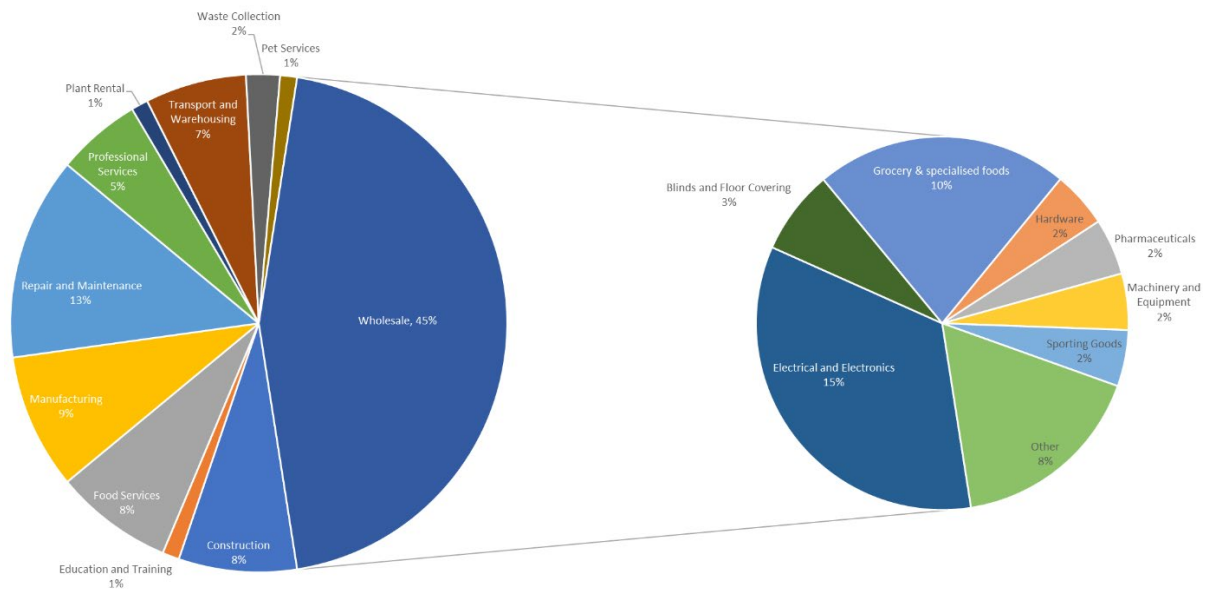


Figure 2: Business Classifications occupying Randwick's Industrial area

EMPLOYMENT ZONE OPTIONS

This sub-section discusses three Zone options under the NSW Government's Employment Zones framework that have been investigated for Randwick's IN2 zone -

- Zone 5 Heavy Industrial
- Zone 4 General Industrial; and
- Zone 3 Productivity Support

Zone 5 Heavy Industrial

The objective of zone E5 heavy industrial is to provide areas for industries that need to be separated from other land uses and to minimise any adverse effects of industry on any other land uses. This includes hazardous storage establishments and heavy industry. Heavy industry includes hazardous industry or offensive industry often involving the use of hazardous storage establishments. This zone due to its impacts on noise and air quality requires separation from other development areas. Given Randwick is an established built up urban area with close proximity to sensitive residential land use it is not suitable for inclusion in the existing IN2 zone in Randwick.

Zone E3 Productivity Support

The E3 Productivity Support zone is intended to provide for land uses that meet the needs of the community, businesses and industries that are not suited to locations in commercial areas like town centres. This zone provides opportunities for new and emerging light industries and covers business parks. The zone also permits childcare facilities, office premises, recreational facilities, respite day-care centres and vehicle sales or hirer premises with development consent.

As identified in the Greater Cities Commission Industrial Lands Review, increasing population density has also been a driver of increased urban services, retail, and recreation uses on industrial lands, which in turn has placed significant pressure on the retention and continuation of light industrial land holdings. On this basis, the E3 Productivity Support zone is not recommended for Randwick City as the greater range of permissible uses may erode the integrity and strategic intent of the light industrial zoned area.

Zone E4 General Industrial

Under the reforms, IN1 General Industrial and IN2 Light Industrial are intended to be merged into a E4 General Industrial zone. This zone includes the addition of a number of new mandated uses that are currently not permitted under the IN2 Light Industrial zone under the RLEP 2012 including 'freight transport facilities' and 'general industries'. These development types produce more noise and require heavy vehicles for their operations and subsequently have a greater impact on surrounding sensitive residential areas.

Proposed Transition from IN2 Light Industrial to E4 General Industrial Employment zone

Randwick-Council's preferred approach to the employment zone options is to maintain the restrictions and permissibility of the IN2 light industrial zone. This would result in a change in the zone name (to E4) but not all of the associated restrictions and permissibility of the zone. This is because, as described above, there is a need to maintain a transition buffer that seeks to minimise land use conflict between industrial and residential use.

Council submitted a request to the Department of Planning that the mandated use of 'freight transport facilities' be removed from the E4 General Industrial zone for the Randwick LGA. It was advised that the removal of mandated uses would not be supported by Parliamentary Counsel.

As an alternative, it is recommended that the CPP include a new Local Provision that prohibits development consent from being granted for freight transport facilities on land within the E4 General Industrial zone. An example of a local provision is as follows:

6.XX Prohibition on development for the purposes of freight transport facilities in the E4 General Industrial zone

(1) The objective of this clause is to minimise land use conflicts and adverse amenity impacts by providing a reasonable level of separation between freight transport facilities and residential land uses.

(2) Despite any other clause in this plan, development consent must not be granted for development for the purpose of a freight transport facility on land within the E4 General Industrial zone.

The above approach mirrors that within the State Environmental Planning Policy (Transport and Infrastructure) 2021. The SEPP, (previously the Three Port SEPP), includes a clause that prohibits development for the purpose of container depots in certain land within the General Industrial zone that are adjacent to residential areas of Matraville.

Recommendations

The following provides a summary of recommendations contained in earlier sections of this Paper. Note, no changes are proposed to development standards (height and FSR). The existing heights and FSR are considered appropriate and are proposed to be carried over to the new LEP with no change.

Neighbourhood Centres

Recommendations:

- Translate all B1 Neighbourhood Centre zoned centres to the E1 Local Centre zone; and
- Translate all clusters of shops zoned residential (identified in the Neighbourhood Centre Study) to the E1 Local Centre zone.

Local Centres

Recommendations:

- Translate Matraville town centre and Coogee town centre from B2 Local Centre to the E1 Local Centre zone; and
- Translate Kensington, Kingsford, Randwick Junction and Maroubra Junction town centres from B2 Local Centre to the E2 Commercial Centre.

Industrial zone

Recommendations:

- Translate the IN2 light industrial zone into Employment Zone E4 General Industrial.

Local Provisions

Recommendations:

- Introduce a local provision requiring proposals to consider the impact upon the fine grain character and scale of smaller centres; and
- Introduce a local provision prohibiting the granting of development consent for the purpose of freight transport facilities on land within the E4 General Industrial zone.

Comprehensive DCP

- Strengthen Part D14 to include locational and anti-clustering controls for restricted premises.

Attachment A: Employment Zone Proposed Zone Objectives and Land Uses

NOTE: the below objectives and land uses are draft only. Final drafting is subject to Parliamentary Council review.

Blue = zone objectives and uses as per the Standard Instrument Local Environmental Plan

Green = zone objectives and uses as per the RLEP 2012 as part of translation (not already included by DPE)

Yellow = mandated land uses proposed by DPE not currently permissible under RLEP 2012

Blue = new land uses due to merging of B1 and B2 zones (currently prohibited in B1 but permissible in B2)

Purple = needs to be a mandated uses in either permissible or prohibited as per DPE instruction

Orange = needs to be included as either permitted without consent or permitted with consent as per DPE instruction

Red = needs to be included to allow existing business to stay in the area without utilising existing use rights

Table 1: B1 Neighbourhood Centre and B2 Local Centre merged and translated to E1 Local Centre

B1 Neighbourhood Centre & B2 Local Centre (as per RLEP 2012)		E1 Local Centre
<p>Objectives of B1 Neighbourhood Centre</p> <ul style="list-style-type: none"> To provide a range of small-scale retail, business and community uses that serve the needs of people who live or work in the surrounding neighbourhood. To enable residential development that is well-integrated with, and supports the primary business function of, the zone. To minimise the impact of development and protect the amenity of residents in the zone and in the adjoining and nearby residential zones. 	<p>Objectives of B2 Local Centre</p> <ul style="list-style-type: none"> To provide a range of retail, business, entertainment and community uses that serve the needs of people who live in, work in and visit the local area. To encourage employment opportunities in accessible locations. To maximise public transport patronage and encourage walking and cycling. To enable residential development that is well-integrated with, and supports the primary business function of, the zone. To facilitate a high standard of urban design and pedestrian amenity that contributes to achieving a sense of place for the local community. To minimise the impact of development and protect the amenity of residents in 	<p>Objectives of zone E1 Local Centre</p> <ul style="list-style-type: none"> To provide a range of retail, business and community uses that serve the needs of people who live, work or visit the area. To encourage investment in local commercial development that generates employment opportunities and economic growth. To enable residential development that contributes to a vibrant and active local centre and is consistent with the Council's strategic planning for residential development in the area. To encourage business, retail, community and other non-residential land uses on the ground floor of buildings. To enable residential development that is well integrated with, and supports the primary business function of, the zone. [Not included as covered by objective three] To facilitate a high standard of urban design and pedestrian amenity that contributes to achieving a sense of place for the local community. To minimise the impact of development and protect the amenity of residents in the zone and in the adjoining and nearby residential zones. To facilitate a safe public domain. To maximise public transport patronage and encourage walking and cycling.

B1 Neighbourhood Centre & B2 Local Centre (as per RLEP 2012)		E1 Local Centre
	<p>the zone and in the adjoining and nearby residential zones.</p> <ul style="list-style-type: none"> To facilitate a safe public domain. 	<ul style="list-style-type: none"> To support a diverse, safe and inclusive day and night time economy. <i>[New objective proposed for B1 and B2 zoned under CPP]</i>
<p>Permitted without consent B1 Neighbourhood Centre Home occupations Recreation areas</p>	<p>Permitted without consent B2 Local Centre Home occupations Recreation areas</p>	<p>Permitted without consent E1 Local Centre Building identification signs Business identification signs Home businesses Home industries Home occupations Recreation areas Roads</p>
<p>Permitted with consent B1 Neighbourhood Centre Bed and breakfast accommodation Boarding houses Business premises Centre-based child care facilities Community facilities Dwelling houses Food and drink premises Garden centres Group homes Hardware and building supplies Home industries Hotel or motel accommodation Kiosks Markets Medical centres Neighbourhood shops Neighbourhood supermarkets Oyster aquaculture Residential flat buildings Respite day care centres Roads Shops Shop top housing Tank-based aquaculture Any other development not specified in item 2 or 4</p>	<p>Permitted with consent B2 Local Centre Boarding houses Centre-based child care facilities Commercial premises Community facilities Dwelling houses Educational establishments Entertainment facilities Function centres Group homes Hostels Information and education facilities Medical centres Oyster aquaculture Passenger transport facilities Recreation facilities (indoor) Registered clubs Residential care facilities Residential flat buildings Respite day care centres Restricted premises Roads Service stations Shop top housing Tank-based aquaculture Tourist and visitor accommodation Any other development not specified in item 2 or 4</p>	<p>Permitted with consent E1 Local Centre Amusement centres Bed and breakfast accommodation Boarding houses Building identification signs Business identification signs Business premises Centre-based child care facilities Commercial premises <i>[Includes Retail premises, which are currently prohibited in the B1 zone. Will allow cellar door premises, landscaping material supplies, plant nurseries, roadside stalls, rural supplies, specialised retail premises, timber yards and vehicle sales or hire premises, which are all currently prohibited in B1]</i> Community facilities Dwelling houses Educational establishments Entertainment facilities Food and drink premises Function centres Garden Centres Group homes Hardware and building supplies Home businesses Home industries Home occupations Hostels Hotel or motel accommodation Kiosks Information and education facilities <i>[Already included in B1 under Planning Proposal]</i></p>

B1 Neighbourhood Centre & B2 Local Centre (as per RLEP 2012)		E1 Local Centre
		<p>Local distribution premises [Previously prohibited under Warehouse and distribution centre in B2 zone]</p> <p>Markets</p> <p>Medical centres</p> <p>Neighbourhood shops</p> <p>Neighbourhood supermarkets</p> <p>Oyster aquaculture</p> <p>Passenger transport facilities</p> <p>Places of public worship</p> <p>Public administration buildings</p> <p>Recreation areas</p> <p>Recreation facilities (indoor)</p> <p>Registered clubs</p> <p>Residential care facilities</p> <p>Residential flat buildings</p> <p>Respite day care centres</p> <p>Restricted premises [Prohibited in B1 but permissible in B2]</p> <p>Roads</p> <p>Service stations</p> <p>Shops</p> <p>Shop top housing</p> <p>Tank-based aquaculture</p> <p>Tourist and visitor accommodation [Tourist and visitor prohibited under B1 but permissible under B2]</p> <p>Veterinary hospitals</p> <p>Any other development not specified in item 2 or 4</p>
<p>Prohibited B1 Neighbourhood Centre</p> <p>Agriculture</p> <p>Air transport facilities</p> <p>Airstrips</p> <p>Amusement centres</p> <p>Animal boarding or training establishments</p> <p>Biosolids treatment facilities</p> <p>Boat building and repair facilities</p> <p>Boat launching ramps</p> <p>Boat sheds</p> <p>Camping grounds</p> <p>Caravan parks</p> <p>Cemeteries</p>	<p>Prohibited B2 Local Centre</p> <p>Agriculture</p> <p>Air transport facilities</p> <p>Airstrips</p> <p>Animal boarding or training establishments</p> <p>Biosolids treatment facilities</p> <p>Boat building and repair facilities</p> <p>Boat launching ramps</p> <p>Boat sheds</p> <p>Camping grounds</p> <p>Caravan parks</p> <p>Cemeteries</p> <p>Charter and tourism boating facilities</p> <p>Correctional centres</p> <p>Crematoria</p>	<p>Prohibited</p> <p>Agriculture</p> <p>Air transport facilities</p> <p>Airstrips</p> <p>Animal boarding or training establishments</p> <p>Biosolids treatment facilities</p> <p>Boat building and repair facilities</p> <p>Boat launching ramps</p> <p>Boat sheds</p> <p>Camping grounds</p> <p>Caravan parks</p> <p>Cemeteries</p> <p>Charter and tourism boating facilities</p> <p>Correctional centres</p> <p>Crematoria</p>

B1 Neighbourhood Centre & B2 Local Centre (as per RLEP 2012)		E1 Local Centre
Charter and tourism boating facilities Correctional centres Crematoria Depots Eco-tourist facilities Electricity generating works Environmental facilities Exhibition homes Exhibition villages Extractive industries Farm buildings Forestry Freight transport facilities Heavy industrial storage establishments Helipads Highway service centres Home occupations (sex services) Industrial retail outlets Industrial training facilities Industries Jetties Marinas Mooring pens Moorings Mortuaries Open cut mining Pond-based aquaculture Port facilities Recreation facilities (major) Residential accommodation Resource recovery facilities Rural industries Sewage treatment plants Sex services premises Storage premises Transport depots Truck depots Vehicle body repair workshops Vehicle repair stations Warehouse or distribution centres Waste disposal facilities Water recreation structures Water recycling facilities Water supply systems Wharf or boating facilities Wholesale supplies	Depots Eco-tourist facilities Environmental facilities Extractive industries Farm buildings Forestry Freight transport facilities Heavy industrial storage establishments Helipads Highway service centres Home occupations (sex services) Industrial retail outlets Industrial training facilities Industries Jetties Marinas Mooring pens Moorings Mortuaries Open cut mining Pond-based aquaculture Port facilities Recreation facilities (major) Residential accommodation Resource recovery facilities Rural industries Sewage treatment plants Sex services premises Storage premises Transport depots Truck depots Vehicle body repair workshops Vehicle repair stations Warehouse or distribution centres Waste disposal facilities Water recreation structures Water recycling facilities Water supply systems Wharf or boating facilities Wholesale supplies	Depots Eco-tourist facilities Electricity generating works <i>[Currently permissible in the B2 zone]</i> Environmental facilities Exhibition homes Exhibition villages Extractive industries Farm buildings Forestry Freight transport facilities Heavy industrial storage establishments Helipads Highway service centres Home occupations (sex services) Industrial retail outlets Industrial training facilities Industries Jetties Marinas Mooring pens Moorings Mortuaries Open cut mining Pond-based aquaculture Port facilities; Recreation facilities (major) Recreation facilities (outdoor) <i>[Currently permissible in the B2 zone, has translated to prohibited in E1. Includes golf course, golf driving range, mini-golf centre, tennis court, paint-ball centre, lawn bowling green, outdoor swimming pool, equestrian centre, skate board ramp, go-kart track, rifle range, water-ski centre etc]</i> Residential accommodation Resource recovery facilities Rural industries Sewage treatment plants Sex services premises Storage premises Tourist and visitor accommodation <i>[Prohibited in B1 but permissible in B2, has translated to permissible in E1]</i> Transport depots Truck depots Vehicle body repair workshops Vehicle repair stations

B1 Neighbourhood Centre & B2 Local Centre (as per RLEP 2012)		E1 Local Centre
Vehicle repair stations Warehouse or distribution centres Waste or resource management facilities Water recreation structures Water recycling facilities Water supply systems Wharf or boating facilities Wholesale supplies		Warehouse or distribution centres Waste disposal facilities Waste or resource management facilities Water recreation structures Water recycling facilities Water supply systems Wharf or boating facilities Wholesale supplies

Table 3: B2 Local Centre translated into E2 Commercial Centre

B2 Local (as per RLEP 2012)	E2 Commercial Centre
<p>Objectives of zone</p> <ul style="list-style-type: none"> To provide a range of retail, business, entertainment and community uses that serve the needs of people who live in, work in and visit the local area. To encourage employment opportunities in accessible locations. To maximise public transport patronage and encourage walking and cycling. To enable residential development that is well-integrated with, and supports the primary business function of, the zone. To facilitate a high standard of urban design and pedestrian amenity that contributes to achieving a sense of place for the local community. To minimise the impact of development and protect the amenity of residents in the zone and in the adjoining and nearby residential zones. To facilitate a safe public domain. 	<p>Objectives of zone</p> <ul style="list-style-type: none"> To strengthen the role of the commercial centre as the focus of business, retail, community and cultural activity. To encourage investment in commercial development that generates employment opportunities and economic growth. To encourage development that has a high level of accessibility and amenity, particularly for pedestrians. To enable residential development that is consistent with the Council's strategic planning for residential development in the area. To ensure that new development provides diverse and activate street frontages to attract pedestrian traffic and contribute to vibrant, diverse and functional streets and public spaces. To minimise the impact of development and protect the amenity of residents in the zone and in the adjoining and nearby residential zones. To facilitate a safe public domain. To support a diverse, safe and inclusive day and night time economy. <i>[New objective proposed for B1 and B2 zoned under Planning Proposal]</i> To facilitate a high standard of urban design and pedestrian amenity that contributes to achieving a sense of place for the community.

B2 Local (as per RLEP 2012)	E2 Commercial Centre
<p>Permitted without consent Home occupations Recreation areas</p>	<p>Permitted without consent Building identification signs Business identification signs Home businesses Home industries Home occupations Recreation areas Roads</p>
<p>Permitted with consent Boarding houses Centre-based child care facilities Commercial premises Community facilities Dwelling houses Educational establishments Entertainment facilities Function centres Group homes Hostels Information and education facilities Medical centres Oyster aquaculture Passenger transport facilities Recreation facilities (indoor) Registered clubs Residential care facilities Residential flat buildings Respite day care centres Restricted premises Roads Service stations Shop top housing Tank-based aquaculture Tourist and visitor accommodation Any other development not specified in item 2 or 4</p>	<p>Permitted with consent Amusement centres Artisan food and drink industries Backpackers' accommodation <i>[Could be removed in drafting as covered by Tourist and visitor accommodation which is already permissible in the B2 zone under RLEP]</i> Boarding houses Building identification signs Business identification signs Centre-based child care facilities Commercial premises Community facilities Creative industry <i>[New definition. Not mandated by DPIE but potential for Council to include within the E2 zone]</i> Dwelling houses Educational establishments Entertainment facilities Function centres Group homes High technology industry <i>[Not mandated by DPIE but potential for Council to include within the E2 zone]</i> Home businesses Home industries Home occupations Hostels Hotel or motel accommodation <i>[Could be removed in drafting as covered by Tourist and visitor accommodation which is already permissible in the B2 zone]</i> Information and education facilities Local distribution premises <i>[Previously prohibited under Warehouse and distribution centre in B2 zone]</i> Medical centres Mortuaries Oyster aquaculture Passenger transport facilities Places of public worship Recreation areas Recreation facilities (indoor)</p>

B2 Local (as per RLEP 2012)	E2 Commercial Centre
	<p>Recreation facilities (outdoor) Registered clubs Residential care facilities Residential flat buildings Respite day care centres Restricted premises Roads Service stations Shop top housing Tank-based aquaculture Tourist and visitor accommodation Vehicle repair stations Veterinary hospitals</p>
<p>Prohibited Agriculture Air transport facilities Airstrips Animal boarding or training establishments Biosolids treatment facilities Boat building and repair facilities Boat launching ramps Boat sheds Camping grounds Caravan parks Cemeteries Charter and tourism boating facilities Correctional centres Crematoria Depots Eco-tourist facilities Environmental facilities Extractive industries Farm buildings Forestry Freight transport facilities Heavy industrial storage establishments Helipads Highway service centres Home occupations (sex services) Industrial retail outlets Industrial training facilities</p>	<p>Prohibited Agriculture Air transport facilities Airstrips Animal boarding or training establishments Biosolids treatment facilities Boat building and repair facilities Boat launching ramps Boat sheds Camping grounds Caravan parks Cemeteries Charter and tourism boating facilities Correctional centres Crematoria Depots Eco-tourist facilities Environmental facilities Extractive industries Farm buildings Forestry Freight transport facilities Heavy industrial storage establishments Helipads Highway service centres Home occupations (sex services) Industrial retail outlets Industrial training facilities</p>

B2 Local (as per RLEP 2012)	E2 Commercial Centre
<p>Industries Jetties Marinas Mooring pens Moorings Mortuaries Open cut mining Pond-based aquaculture Port facilities Recreation facilities (major) Residential accommodation Resource recovery facilities Rural industries Sewage treatment plants Sex services premises Storage premises Transport depots Truck depots Vehicle body repair workshops Vehicle repair stations Warehouse or distribution centres Waste disposal facilities Water recreation structures Water recycling facilities Water supply systems Wharf or boating facilities Wholesale supplies</p>	<p>Industries Jetties Marinas Mooring pens Moorings Mortuaries <i>[Prohibited in B2 under RLEP, has translated as permissible in E2]</i> Open cut mining Pond-based aquaculture Port facilities Recreation facilities (major) Residential accommodation Resource recovery facilities Rural industries Sewage treatment plants Sex services premises Storage premises Transport depots Truck depots Vehicle body repair workshops Vehicle repair stations <i>[Prohibited in B2 under RLEP, has translated as permissible in E2]</i> Warehouse or distribution centres Waste disposal facilities Water recreation structures Water recycling facilities Water supply systems Wharf or boating facilities Wholesale supplies</p>

Table 3: IN2 Light Industrial translated into E4 General Industrial

IN2 Light Industrial (as per RLEP 2012)	E4 General Industrial
<p>Objectives of zone</p> <ul style="list-style-type: none"> To provide a wide range of light industrial, warehouse and related land uses. To encourage employment opportunities and to support the viability of centres. To minimise any adverse effect of industry on other land uses. To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area. 	<p>Objectives of zone</p> <ul style="list-style-type: none"> To provide a range of industrial, warehousing, logistics and related land uses. To ensure the efficient and viable use of land for industrial uses. To minimise any adverse effect of industry on other land uses. To encourage employment opportunities.

IN2 Light Industrial (as per RLEP 2012)	E4 General Industrial
<ul style="list-style-type: none"> To support and protect industrial land for industrial uses. 	<ul style="list-style-type: none"> To enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers. To support and protect industrial land for industrial uses.
<p>Permitted without consent Home occupations Recreation areas</p>	<p>Permitted without consent Building identification signs Business identification signs Home occupations Recreation areas Roads</p>
<p>Permitted with consent Depots Garden centres Hardware and building supplies Horticulture Industrial training facilities Light industries Neighbourhood shops Oyster aquaculture Places of public worship Roads Tank-based aquaculture Warehouse or distribution centres Any other development not specified in item 2 or 4</p>	<p>Permitted with consent Building identification signs Business identification signs Depots Freight transport facilities [Facility for the bulk handling of goods, loading and unloading of goods as well as the parking, servicing, repair of the transport vehicles themselves] Garden centres General industries [A building or place used to carry out an industrial activity. Excludes heavy industry (hazardous or offensive uses). An example of General industry is manufacturing]. Goods repair and reuse premises [New definition] Hardware and building supplies Horticulture Industrial retail outlets Industrial training facilities Light industries Local distribution premises Neighbourhood shops Oyster aquaculture Places of public worship Roads Take away food and drink premises [Previously prohibited under Food and drink premises. RLEP 2012 only allowed for Neighbourhood shops to service the businesses and workers. Restaurants and cafes are still prohibited] Tank-based aquaculture Vehicle body repair workshops; (permissible under the RCC LEP 1998 under the Zone No 4A (Industrial Zone) Vehicle repair station (permissible under the RCC LEP 1998 under the Zone No 4A (Industrial Zone) Warehouse or distribution centres</p>

IN2 Light Industrial (as per RLEP 2012)	E4 General Industrial
<p>Prohibited</p> <p>Agriculture</p> <p>Air transport facilities</p> <p>Airstrips</p> <p>Amusement centres</p> <p>Boat launching ramps</p> <p>Boat sheds</p> <p>Business premises</p> <p>Camping grounds</p> <p>Caravan parks</p> <p>Cemeteries</p> <p>Charter and tourism boating facilities</p> <p>Centre-based childcare facilities</p> <p>Community facilities</p> <p>Correctional centres</p> <p>Crematoria</p> <p>Eco-tourist facilities</p> <p>Educational establishments</p> <p>Electricity generating works</p> <p>Entertainment facilities</p> <p>Environmental facilities</p> <p>Exhibition homes</p> <p>Exhibition villages</p> <p>Extractive industries</p> <p>Farm buildings</p> <p>Food and drink premises</p> <p>Forestry</p> <p>Freight transport facilities</p> <p>Function centres</p> <p>General industries</p> <p>Health services facilities</p> <p>Heavy industrial storage establishments</p> <p>Heavy industries</p> <p>Helipads</p> <p>Highway service centres</p> <p>Information and education facilities</p> <p>Jetties</p> <p>Marinas</p> <p>Markets</p> <p>Mooring pens</p>	<p>Any other development not specified in item 2 or 4</p> <p>Prohibited</p> <p>Agriculture</p> <p>Air transport facilities</p> <p>Airstrips</p> <p>Amusement centres</p> <p>Boat launching ramps</p> <p>Boat sheds</p> <p>Business premises</p> <p>Camping grounds</p> <p>Caravan parks</p> <p>Cemeteries</p> <p>Centre-based childcare facilities</p> <p>Charter and tourism boating facilities</p> <p>Community facilities</p> <p>Correctional centres</p> <p>Crematoria</p> <p>Eco-tourist facilities</p> <p>Educational establishments</p> <p>Electricity generating works</p> <p>Entertainment facilities</p> <p>Environmental facilities</p> <p>Exhibition homes</p> <p>Exhibition villages</p> <p>Extractive industries</p> <p>Farm buildings</p> <p>Food and drink premises</p> <p>Forestry</p> <p>Function centres</p> <p>Health services facilities</p> <p>Heavy industrial storage establishments</p> <p>Heavy industries</p> <p>Helipads</p> <p>Highway service centres</p> <p>Information and education facilities</p> <p>Jetties</p> <p>Marinas</p> <p>Markets</p> <p>Mooring pens</p> <p>Moorings</p> <p>Mortuaries</p>

IN2 Light Industrial (as per RLEP 2012)	E4 General Industrial
<ul style="list-style-type: none"> Moorings Mortuaries Office premises Open cut mining Pond-based aquaculture Port facilities Public administration buildings Recreation facilities (indoor) Recreation facilities (major) Recreation facilities (outdoor) Registered clubs Residential accommodation Respite day care centres Restricted premises Roadside stalls Rural industries Shops Specialised retail premises Tourist and visitor accommodation Transport depots Vehicle sales or hire premises Water recreation structures Wharf or boating facilities 	<ul style="list-style-type: none"> Office premises Open cut mining Port facilities Public administration buildings Recreation facilities (indoor) Recreation facilities (major) Recreation facilities (outdoor) Registered clubs Residential accommodation Respite day care centres Restricted premises Roadside stalls Rural industries Shops Specialised retail premises Tourist and visitor accommodation Transport depots Vehicle sales or hire premises Water recreation structures Wharf or boating facilities

