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## Q1

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## Q2

Submissions may be made public (including full name, organisation name and postcode only). You can choose to publish your submission anonymously (using your postcode only). Please select from the options below:

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## Q3

What has been your experience with the retain and manage industrial lands policy?

Our experience has been that council's have had no choice to rezone industrial lands to suit local circumstances. The way the policy has been written has not given councils and policy makers the ability to make recommendations and decisions appropriate to a precinct. It also does not support industrial and urban services precincts evolving and modernising into higher value precincts (e.g. advanced technology and knowledge centres). It has been adopted as a blanket policy approach without considering the nuances and changes occurring in these precincts.

We have seen examples of industrial precincts being underutilised for employment and their 'zoned' purpose. For instances businesses / jobs envisaged within industrial precincts under the current land use zoning are not wanting to necessarily locate within industrial precincts with no recent investment in these locations. Where are aware of one council s identifying in their LSPS that a possible solution to address this issue was to therefore add more permissible uses to the IN1 zone. The policy position to protect and retain industrial land without truly investigating and considering the current uses; the likely demand and takeup of industrial uses for the specific locality (i.e. considering locational features and constraints, heavy vehicle accessibility, etc); and whether the precinct should contribute towards a different employment story is therefore flawed and could compromise the protection of industrial lands that should be retained.

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**Q4**

What has been your experience with the review and manage industrial lands policy?

Similar to response 3 above, there has been a reluctance for councils to rezone industrial lands and consider whether industrial lands / precincts could be used for other employment uses and/or contribute towards a mixed use precinct. New economy jobs thrive on precincts that include a mix of uses, diversity and amenity.

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**Q5**

What suggestions would you make for industrial lands policy in the Greater Sydney Region Plan?

Refer to Macroplan's attached submission dated 13 August 2021. Retention and protection of industrial lands should be based on their strategic importance and locational context, and which would benefit from being separated from sensitive uses. This may require consideration of restricting the permissible uses that can be added to the industrial zones rather than providing councils with the minimum list permissible uses for industrial lands which then results in a raft of uses being permissible within these zones that do not support the primary purpose and use. Notwithstanding this, consideration must be given to providing amenity and services to workers of these industrial precincts. Further work with DPIE may be required as part of the Employment Zone Review work.

Retention of industrial lands should be based on data and evidence as well as an understanding that industry is evolving and changing rapidly. The policy position needs to be reviewed regularly to keep pace with these changes.

It is important that there is greater opportunity for employment uses to occur across all zones, allowing for co-locating and mixing of employment uses rather than separating uses based on a land use definition.

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**Q6**

Are there any barriers to industrial lands fulfilling their functions?

Restrictions on operating hours and truck accessibility.

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**Q7**

From your perspective, what would be the most productive way to manage industrial lands? What are the opportunities to make industrial areas more productive?

Firstly, determine what should be classified and retained as industrial lands considering the site/precinct's ability to operate and function without significant constraints (e.g. operating hours and truck accessibility) to optimise the use of assets and infrastructure.

Secondly, consider design and built form changes (e.g. vertical warehousing) and layering of uses to optimise the use of limited industrial and supply within certain locations.

Thirdly, allow for amenity and services to support the local workforce as it is important to continue to attract new business investment and employees to precincts that support innovative thinking and are great places to work.

Fourthly, minimise employment uses which could be located within other employment zones and mixed use precincts. There is an opportunity for greater co-location and mixing of residential and employment uses in other land use zones. Also some uses within industrial zones could be located within other employment zones therefore prioritising industrial lands for uses which would benefit from being within these specific locations.

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**Q8**

Are there particular locations in Greater Sydney that are most appropriate to transition to alternative uses for industrial lands? Why?

We recently worked with a client looking at a 7ha site in Clyde (15-19 Berry St Clyde). The site contains two large three storey disused warehouse buildings, formerly used by Toll Holdings as a distribution warehouse and Mitsubishi for the distribution of car parts. The part of the site currently used by bulky good / light industry type users (e.g. furniture and white goods) employees approximate 70 people. Previous users of the site have been suffocated and restricted from being able to undertake activities (e.g. B-double access for freight and logistics uses) for which the site is zoned for. These users have therefore moved further west. The businesses / jobs envisaged for the site under the current land use zoning are not wanting to locate on the site with no recent investment in this location.

The site is located adjacent to Clyde train station and adjoins Parramatta Road. Granville Precinct to the west of the site is transforming into a mix of housing and employment uses and land to the south-east and south-west is also identified for transformation (i.e. for services and innovation and as a creative learning precinct).

The site is wedged between the Granville Precinct and Auburn Precinct of the Parramatta Road Corridor Urban Transformation Strategy, bookended by precincts on either side of the site being identified for residential and employment uses. Therefore, the retention of our client's site for IN1 Industrial zoning does not make sense in the context of the transformation proposed along this corridor, specifically on the southern side of Parramatta Road.

For this specific site there is opportunity to deliver a mixed use precinct outcome which is dominated by employment uses and additional jobs aligned with the locational and site specific context and the transformation occurring within this locality.

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**Q9**

Are you aware of any new types of industrial or urban services uses occurring in industrial areas?

The knowledge intensive economy and other trends such 'localisation', reshoring of manufacturing, and sustainable sourcing and product production are transforming our industrial lands and this story must be told. In addition, it is important to note that the majority of leases signed (with sites over 5,000m<sup>2</sup> in site) within industrial precincts in the past year has been dominated by freight and logistics uses. The rise of e-commerce will continue to influence the use of industrial and employment lands.

Almost every industrial area in NSW, and this applies to Sydney as well, have a high percentage of uses which are clearly not industrial uses however, the industrial areas are for the most part the only locations where a whole raft of uses can locate. There is also a clear misperception that industrial zoned lands are the premium supply of employment lands and jobs. This misconception and inappropriate protection of these areas using dated terminology such as "industrial" is standing in the way of many localities being able to restructure to a raft of uses which if allowed to occur would generate significant opportunities for additional employment and innovation.

## Q10

Please provide any further comments below

There is an urgent need for the planning system to move away from the notion that 'industrial' is the premium means of addressing and ensuring a supply of employment uses. The true definitions of industrial will talk about this being a zone which specialises in the manufacturing of industrial products and the provision of support services for industrial manufacturing. The mindset and designation of areas needs to move to a different paradigm where there is an appreciation of the commercial and employment status of localities zoned accordingly and where a multiplicity of uses can be established because they coexist, compliment, and allow value-add and interaction.

There is also a need for greater rigour to be applied in the development of local strategic planning statements (LSPSs) whereby the nuances and threads that pertain to localities where employment uses are gathering and developing are therefore assisted and enabled. The notion of a special facility zone where a conversation or narrative is created within of a LSPS could be a valuable bottom-up contribution to the overarching review of district plans and the current debate around the inappropriateness of a blanket approach to the designation of industrial as part of the precautionary approach.

It is noted that in the context of it being claimed that NSW is moving into a more strategic led planning model that the bottom up contribution and relationship of the LSPS created in the review of legislation in 2018 is not mentioned in the GSC's review, there is only reference to LEPs. There's an opportunity for the LSPSs – if prepared with enough strategic and evidence based considerations - to feed into the employment and industrial lands debate which is currently being considered. However, if the policy position created by the GSC imposes a similar blanket approach as opposed to nuances to come out as part of LSPSs, then will we continue to see council's produce LSPSs which do not demonstrate their specific needs.

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## Q11

Would you like to attach a document?

**MP Submission - Review Industrial Lands Policy - 13082021.pdf (82.9KB)**

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13 August 2021

Ms Elizabeth Mildwater  
Chief Executive Officer  
Greater Sydney Commission

Dear Ms Mildwater,

## **RE Review of Industrial Lands Policy (additional feedback for survey)**

We understand that the Greater Sydney Commission (GSC) is required to evaluate the retain and manage approach to managing industrial and urban services land in Greater Sydney against alternative approaches in order to identify what would maximise net benefits to the State. It is important to note as part of this review that the nature of activities occurring within the industrial sector have changed and continue to change, mainly driven by innovation and technology advancements. The reason for specifically creating an industrial land use zone and separating these uses from residential and other employment uses, as occurred during the rise of the Industrial Revolution, now should be further interrogated as part of this policy review process.

Many land uses located within industrial zones would not be defined as an 'industrial' use (e.g. indoor play centres for children and places of worship) and could be located within other urban and employment zones such as the proposed E3 Productivity Support and MU1 Mixed Use Zones. In addition, uses that are defined as 'industrial' such as manufacturing products with a 3D printer (e.g. mobile phone covers) could also be located within other urban and employment zones such as the E2 Commercial Centre, E3 Productivity Support and MU1 Mixed Use Zones. Macroplan is of the opinion that there should be greater opportunity to integrate and mix industrial type uses within general employment and mixed use precincts where design, technology and innovative solutions demonstrate that coexisting can occur. Uses that were once deemed as only being appropriate to be located within industrial areas no longer need to be separated from other land uses.

Notwithstanding the above, Macroplan is also of the opinion that certain uses do require separation and protection from sensitive uses / users. Industrial precincts that are to be retained and protected need to be able to demonstrate why these precincts require separation and protection from being converted to other employment, residential and mixed use zones. It is inappropriate to continue to take a precautionary approach to retaining industrial lands where there is evidence to demonstrate that such lands are no longer functioning, and are unlikely to function, for activities which require separation and protection for sensitive land uses. This can result in the underutilisation of this land and/or uses which meet the criteria of 'permissibility' but do not support the policy position of retaining land for uses which are appropriate to be located within an industrial land use zone.

The policy position of retain, manage and plan for industrial lands in Greater Sydney has been a blanket approach to managing industrial zoned land without understanding the nuances of each industrial precinct in Sydney (i.e. its

primary role, function and use) and the precinct's spatial, locational and physical attributes. What the review of the 20 industrial precincts in Greater Sydney should show is that these precincts all function differently and that there are uses and activities occurring in these precincts that could be located within other employment zones/areas (i.e. the proposed E2 Commercial Centre, E3 Productivity Support and MU1 Mixed Use Zones).

It is our opinion that the GSC's review should adopt the below planning principles as part of its review process in order to: maximise infrastructure and asset utilisation; achieve improved environmental and social outcomes (e.g. reduce vehicle kilometres travelled for freight vehicles; provide employment opportunities closer to home including areas better serviced by public transport; etc); and increase productivity, job opportunities and land utilisation.

**Principles that should be adopted for the Policy Review:**

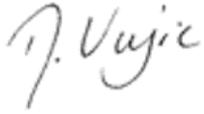
1. **Identify, protect and plan for strategically important lands** – Strategic freight and logistical hubs need to be identified and protected (e.g. ports, airports, intermodals and major warehouse and distribution lands). These areas should be able to operate 24/7.
2. **Separate industrial lands uses which have impacts** – Those zones providing for high impact industrial uses and which require large-format distribution sites need to be separated from other more sensitive users / uses (e.g. activities that may generate noise, odour, etc and that have numerous heavy vehicle movements).
3. **Encourage and facilitate coexisting and mixing of low impact industrial (employment) uses** – A flexible approach needs to be applied to employment zones more generally. Increased land use efficiency can be achieved through vertical integration and co-location of land uses. Adopt a more flexible approach of considering 'industrial' uses on their merits, locational basis, design, and level of impact rather than definition of use in all instances.
4. **Discourage inappropriate use of term industrial land** – The new world needs to have correct packaging of terms like commercial and employment as well as a multiplicity of use grouped under new zones

While we appreciate that this review process will not be able to address NSW's land use zoning system, we believe it is important for the GSC to acknowledge that there is not a one-size fits all solution and that the new employment economy is moving away from separating land uses to opportunities to collaborate and coexist more freely within our urban framework. A strategic led planning system allows for a place-based/locality approach and the development of a narrative that is reflective of that place to be formed and implemented rather than a regulatory system of rules and placing uses within land use boxes.

The outcomes of this policy review must be available before Greater Sydney councils prepare their Employment Development Strategies and apply the new employment zones to their Local Environmental Plan amendments.

Should you wish to discuss our comments and feedback further, please do not hesitate to me via email on [Daniela.vujic@macroplan.com.au](mailto:Daniela.vujic@macroplan.com.au) or by phone on 0427 664 128.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Vujic', written in a cursive style.

**Daniela Vujic**  
**General Manager Planning**