

30 October 2018

The Acting Director Industry and Infrastructure Policy
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

By email: Threeports.SEPP@planning.nsw.gov.au

Dear Sir/Madam

Response to Proposal for Possible Amendments to State Environmental Planning Policy, Three Ports 2013

We write to you in relation to the proposed changes under consideration for the Three Ports SEPP at Port Botany.

[REDACTED] is the owner of land at [REDACTED] Banksmeadow, which is within the IN1 zoned area covered by the Three Ports SEPP.

We have been involved in this land for some time and more recently developing the site as a smaller lot subdivision that was supported by Botany Bay City Council and the now Bayside Council.

We therefore read with interest the proposals contained within the recently exhibited "Amendments to State Environmental Planning Policy (SEPP) Three Ports 2013" and in particular the section entitled "Part 2 – Other Regulatory Changes Being Considered".

As owners and developers of land in the area we have had deep involvement with the local market and have dealt with a range of buyers and tenants who have shown interest in our land.

The common factor being the high demand for industrial land to service Southern Sydney, the eastern suburbs and the Port.

The recent spate of residential land rezoning in the area and in South Sydney has contributed to the loss of industrial land in the area, and as a result we have seen increasing demand for a smaller industrial land supply.

The proposal to now potentially change the minimum lot size for subdivision and to alter the permitted uses will not assist and will most likely serve to further stifle use and limit land supply.

We therefore make the following observations that the Department should be aware of:

Lack of Land Supply to worsen if a minimum land size is imposed. If a minimum lot size is imposed this will exacerbate the supply of land for industrial uses. Whilst we understand that the Port may see a need for large scale land holdings, the Department should also be mindful of the role the area plays in meeting general industrial and service industry to the local area and southern Sydney.

Further we note that there are numerous examples of freight and container operations operating on considerably smaller parcels of land. Our current land holding of some 4,500 m2 is being actively pursued as a container facility, therefore we see no need to change the minimum lot size. Similarly, there are numerous examples of freight forwarders or business that rely on container access operating out of smaller industrial units;

The current permitted uses should not be reduced but rather the Department should think about additional uses and activities that benefit from the Port location. There a range of business who have been interested in our land who rely on goods coming in from the Port or Airport that don't fit neatly into the definitions, yet they rely on container delivery. Similarly, there are service businesses that service the local area that require an industrial based close to local populations. Why would the Department then deliberately force these smaller uses out into Western Sydney and create more road traffic and congestion?

Accordingly, and based on our experience as a land owner and developer in the area we would not support the proposal to amend the SEPP and believe that the current statutory provisions in relation to subdivision and land use should be left unchanged. **Therefore, we support Option 4 – Do Nothing.**

Should you have any queries please do not hesitate to contact the undersigned.

Yours faithfully

