

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.

[REDACTED] Ltd is the owner of an 8,650m² parcel of land at the corner of [REDACTED] and [REDACTED] Banksmeadow [REDACTED] directly opposite the Port. We therefore have a strong understanding of user demand and activities in the area. Our site is currently used as a container storage facility servicing the Port.

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"

Over the past 15 years we have had numerous parties interested in leasing our site for a range of uses with a common purpose, being directly related to the Port. Whether large or small they are attracted by the proximity to the Port. We therefore make the following observations that the Department should be aware of:

A minimum lot size plan for sites larger than 2ha that restricts land subdivision to no less than 2 Ha would be detrimental as it would remove any opportunity for flexibility in meeting demand and only services large institutional groups to the detriment of smaller operators. Even casual review of the nearby industrial sites and unit estates highlights that freight forwarders and distributors happily operate out of smaller land parcels or industrial units. They don't require just large sites as suggested in the proposal paper. The proposition that large 2 Ha sites or that land subdivision should be limited is therefore inappropriate. There needs to be smaller parcels of land and smaller industrial units to efficiently service the Port. Any reduction in lot sizing would therefore stifle small operators who use smaller sites for their port related business operations. The

2ha minimum lot size should not be pursued and the current controls should be maintained.

Land values are already on the increase due to recent residential land rezoning in Botany and South Sydney. To suddenly limit subdivision and/or development type will further constrain land supply and drive up lands values and rents for all Port related operators;

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 contacted us over the years 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 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 in the area for the past 15 years 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 on [REDACTED]

Yours faithfully

[REDACTED]