



*Planning Direction Pty. Ltd.*  
*Town Planning & Development Services*

13th March 2019

The General Manager  
Penrith Council  
PO Box 60,  
PENRITH NSW 2751

**Att: Wendy Connell,**

**Re: Request for Further Information - DA18/0577  
No 1-23 Lenore Drive Erskine Park**

I refer to the email dated the 8th January 2019 outlining a request for additional information in respect of the development application for the proposed industrial complex development comprising of 29 Units & 1 Cafe tenancy at the abovementioned property.

In particular Council has raised the following:

*As per Council's Pre-lodgement advice dated 9 November 2017, no justification, or evidence, has been provided to support the unit size proposed, or how they meet the zone objectives. An economic analysis of potential land uses permitted under the IN1 zone, anticipated employment figures and the gross floor areas demands to undertake these uses may determine that larger unit sizes for more employment generating development is required. The statements outlined in the Statement of Environmental Effects are not adequate.*

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The stated zone objectives are as follows:

- *To facilitate a wide range of employment-generating development including industrial, manufacturing, warehousing, storage and research uses and ancillary office space.*
- *To encourage employment opportunities along motorway corridors, including the M7 and M4.*
- *To minimise any adverse effect of industry on other land uses.*
- *To facilitate road network links to the M7 and M4 Motorways.*
- *To encourage a high standard of development that does not prejudice the sustainability of other enterprises or the environment.*
- *To provide for small-scale local services such as commercial, retail and community facilities (including child care facilities) that service or support the needs of employment-generating uses in the zone*

The first zone objective is to seek appropriate forms of development on land which lead to employment generating development offered by a variety of uses including manufacturing, warehousing, storage and research. The provision of a variety of building sizes promotes the attractiveness of the development to a range of end users unlike the limitations placed by one large static building.

The provision of 30 unrelated tenancies automatically employs 60 plus staff directly and engages existing businesses in the broader catchment indirectly resulting in the employment of more people. A high percentage of small businesses will source employees from the local work force and trade with local businesses.

Had the site being developed as a large warehouse complex and given the high levels of automation, the number of people employed directly and indirectly would be far less.

Given the next three objectives relate to transport corridor links and impacts, the subject site is only capable of accommodating small industrial units which deal with small trucks and vans as service vehicles. A large semi trailer cannot practically access the site and is therefore discouraged given the triangular shape of the site and inadequate turning paths from the main roads. Such has been determined only recently after much negotiation with RMS in respect of the project.

Minimal works are required to the respective main roads to facilitate the development of the site as proposed. RMS welcomes this outcome.

Smaller industrial units will also compliment the large scale industrial complexes in the vicinity by utilising potentially product and services. There will be no direct competition and as such will not prejudice the sustainability of other enterprises.

The smaller industrial units are suited to this 'edge' development site constrained by access, configuration and topography. A better resolution of levels and external finishes is derived in this instance, particularly with the articulated elevations facing the main roads. Such would not be appropriate for a large warehouse complex.

The provision of smaller industrial units activates the edge of the precinct and is likely to attract users from the nearby growing residential communities in search of smaller modern industrial units. Such is not offered in the larger industrial complexes existing in the precinct.

The applicant's marketing arm has established a high demand for the scale of smaller units as proposed. Flexibility still remains to consolidate units should the demand be there upon completion and marketing of the development.

Finally, the smaller industrial units enables the negotiation with Council to proceed with the inclusion of Council's land in the development site. A clean swap for Council's redundant laneway is readily achievable. Council's property department has expressed a preference to access a finished unit as fair payment for Council's land. The proposed design facilitates this transaction and appropriately ensures that no land parcels remain fragmented because of the proposal. A major principle of the SEPP.

The SEPP does not call for economic analysis of hypothetical uses and neither does the EPA Act 1979. The proposal does however meet the primary objects of the Act being:

### **1.3 Objects of Act**

*(cf previous s 5)*

*The objects of this Act are as follows:*

*(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,*

*(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,*


- (c) to promote the orderly and economic use and development of land,*
- (d) to promote the delivery and maintenance of affordable housing,*
- (e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,*
- (f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),*
- (g) to promote good design and amenity of the built environment,*
- (h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,*
- (i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,*
- (j) to provide increased opportunity for community participation in environmental planning and assessment.*

The urban design panel of Council also endorsed the design as being a good fit in its environment.

The proposal is highly appropriate in terms of the zone, zone objectives and site considerations.

Should you require any further information please contact the undersigned.

Yours Faithfully

A handwritten signature in black ink that reads "Nigel White". The signature is written in a cursive style with a large, stylized initial 'N'.

Nigel White