

3rd August 2020

The General Manager
Penrith Council
C/O
City Strategy Department - Penrith Council
PO Box 60
Penrith NSW 2751

Via email: citystrategy@penrith.city

Draft Penrith Employment Land Strategy

Dear Mr Winn

I write in relation to the *Draft Penrith Employment Land Strategy (draft Strategy)* prepared by Penrith Council (Council), for comment until 3rd August 2021.

The Urban Taskforce has been vocal in our calls for much-needed improvements to planning systems and policies to support economic growth and productivity. This remains particularly important in this fast-changing COVID-19 world.

Urban Taskforce supports the “strategic directions” of the draft Strategy and Council’s commitment to ensuring there is enough employment land available, and located in the right locations, in the Penrith local government area. We note the work undertaken on behalf of the Council to explore market trends and the changing needs of employers. We support a number of proposed actions that seek to improve the flexibility of relevant planning provisions. The Urban Taskforce commends Council for this approach and supports Council in these proposals.

The NSW Productivity Commission’s White Paper is clear in stating that “*to boost productivity we need a more responsive and flexible planning system*”. When specifically referring to unlocking the potential of employment and industrial lands the paper states “*If the planning system is going to enable higher productivity, it must give business centres the greatest possible capacity and flexibility to do this.*”

As such, **Urban Taskforce recommends** that the draft Strategy be finalised with a view to delivering even greater flexibility across employment areas and the greatest possible development capacity.

Urban Taskforce is concerned that one of the proposed actions runs counter to the strategic directions of the draft Strategy by being overly prescriptive and anti-competition. Specifically, Urban Taskforce **objects to:**

Draft Action 12 - encouraging industries that offer higher employment densities in new industrial precincts

Encouraging certain industries at the expense of others is anti-competition and outside the remit of the Environmental Planning and Assessment Act 1979. Any exclusion of competition will fail to generate much valued new employment opportunities and activation of emerging and planned employment areas. Further, this narrow approach will not drive the investment needed to deliver improvements to underperforming existing employment areas and centres.

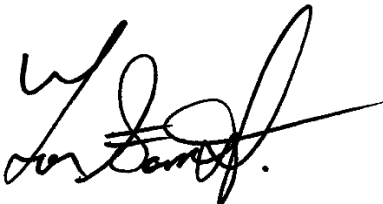
In the delivery of long-term productivity benefits and local employment opportunities it is important that all employment lands cater to the widest range of land uses and the emerging needs of investors and employers.

Accordingly, **Urban Taskforce recommends** that action No. 12 is removed from the final strategy.

Urban Taskforce urges Council to consider our recommendations in finalising the draft Strategy.

Table 1 includes a summary of Urban Taskforce recommendations.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending to the right.

Tom Forrest
Chief Executive Officer

Table 1:
Summary of Urban Taskforce recommendations

	Urban Taskforce recommendation
1.	<p>Consistent with the findings of the NSW Productivity Commission's White Paper the Urban Taskforce recommends that the draft Strategy be finalised with a view to delivering even greater flexibility across employment areas and the greatest possible development capacity.</p>
2.	<p><i>Draft Action 12 - encouraging industries that offer higher employment densities in new industrial precincts</i></p> <p>runs counter to the strategic directions of the draft Strategy by being overly prescriptive and anti-competition.</p> <p>Urban Taskforce recommends that action No. 12 is removed from the final strategy.</p>