

Noel Hemmings QC

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15 December 2015

Department of Planning and Environment
23-33 Bridge Street
Sydney NSW 2000
Attention: Kate MacDonald

Dear Ms MacDonald

**Exhibition of Environmental Impact Statement for Oakdale South Industrial Estate –
Submission on behalf of Jacfin Pty Ltd**

I act for Jacfin Pty Ltd (**Jacfin**), the owner of Lot A in Deposited Plan 392643, Burley Road, Horsley Park (**Lot A**).

This submission is made on behalf of Jacfin in relation to the Environmental Impact Statement (**EIS**) for the Oakdale South Industrial Estate (**OSE**), State Significant Development No. 6917, which is currently on exhibition.

Jacfin objects to the OSE development as currently proposed.

Jacfin has commissioned expert analysis of the Oakdale South EIS by JBA Urban Planning Consultants. JBA has assessed the deficiencies of the proposed development, which are set out in detail in sections 3 to 6 of the **enclosed** submission. It is clear that those deficiencies are so fundamental that the development cannot be properly assessed or reasonably approved as submitted.

In the circumstances, there is no alternative to the refusal of the application, or the deferral of the application if the applicant wishes to take the opportunity to submit revised plans and the essential information and assessments that are required. Of course, any such revised plans or further information would need to be formally exhibited for public comment.

Yours sincerely



Noel Hemmings QC

Encl.