

17th December 2020

Mr Jim Betts
Secretary
Department of Planning, Industry & Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Online submission

Draft Mamre Road Development Control Plan

Dear Jim

I write in relation to draft Mamre Road Development Control Plan (draft DCP) placed on public exhibition by the Department of Planning, Industry and Environment (DPIE) for comment until 17th December 2020.

The Urban Taskforce acknowledges the need for the Mamre Road precinct to be properly planned so as to deliver on the precinct vision of *"a world-class industrial area, primarily catering for warehousing and logistics and forming an extension of the Western Sydney Employment Area"*.

However, the extent of development controls proposed in the 110 page draft DCP document for industrial land is **not supported**.

Of particular concern are sections 3.2 – *Views and Visual Impacts* and Section 4.2.4 – *Building Design*. In the context of planning for warehouses and distribution centres these sections are outrageously prescriptive. While provisions relating to protecting view corridors and facilitating passive surveillance of the streetscape may be appropriate as guidelines in a residential setting, they are excessively contrived for an industrial area. This work goes directly against the proposals to create a fast track SSD approval process – a genuine effort to reduce red tape and regulation.

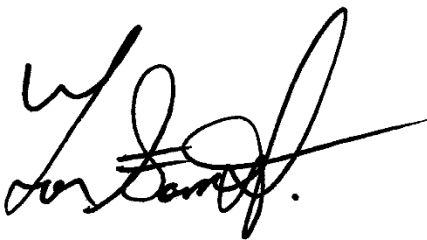
Urban Taskforce draw's DPIE's attention to the NSW Productivity Commission's *Green Paper- continuing the Productivity Conversation*. The Productivity Commission's paper identifies the NSW Planning System as being *"overly complex, prescriptive and slow"*. The report's recommendations include *"Cut NSW planning assessment gap - Continue to implement measures to reduce red tape and complexity in the planning system. Bring NSW approval assessment times into line with other jurisdictions' times by the end of 2023"*.

The draft DCP represents the kind of overly prescriptive and complex plan the Productivity Commission identifies as needing to change. The draft DCP is overly prescriptive by containing pages and pages that proponents need to address in designing buildings and preparing DAs. The same pages and pages are then required to be considered by planners in assessing the DAs. This extends assessment times and adds to the costs of delivery of both the actual development and the approval.

The Urban Taskforce **recommends** DPIE reviews the draft DCP in the context of the NSW Productivity Commission's Green Paper with a view to the final DCP being a fit for purpose, simple document to guide the preparation and assessment of applications for industrial buildings.

The Urban Taskforce is always willing to work closely with the Government to provide a development industry perspective on these issues.

Yours sincerely

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

Tom Forrest
Chief Executive Officer