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17 December 2020

Jane Grose
Director Western
Department of Planning, Industry & Environment
Submitted via the NSW Planning Portal

Dear Madam,

Re: Submission to the Mamre Road Development Control Plan (DCP)

As the owner, director of Pazit Pty Ltd (Pazit), the owner of Lot 4132 DP 857093 the 120 ha. of land now zoned industrial and forming the eastern edge of the Mamre Road Precinct (MRP). We have Urbis Pty Ltd as our consultants preparing a more detailed and technical response to the exhibited DCP.

As owner of the land and having worked on the land for 38 years, I make this submission, **generally in support of the DCP**, however, submit five major points that we feel will need to be addressed, prior to finalising the DCP, thereby, providing a better outcome for the precinct.

Road Network

Our 120 ha. of land being isolated and currently land locked, for all industrial vehicular access which as highlighted in the DCP emanates from the west through other development sites. **We support the three road connectivity from the west as highlighted in the DCP**, however, an improvement could be made if the southern link road as indicated in the DCP, would be located southwards to align with the current Abbott Road.

We have prepared, a longitudinal, horizontal and vertical section for the current south road as indicated on the DCP. This road has a gradient of at least 7%, the consequence is therefore, the steepness for B-doubles manoeuvrability, the major excavations required to achieve this grade and the requirement for extensive retaining walls for the road, building platforms, and driveways thereto. Whilst of the location of the road overall seems to suit the DCP on plan. The construction and practicality of the road in this location is more difficult to address.

We have also prepared, a longitudinal, horizontal and vertical section, for the continuation of Abbott Road, up to our property, this connection has a 6% gradient and is much less onerous for heavy vehicles and furthermore, requires very little excavation and retaining walls, and a much more direct and shorter route to Mamre Road. Thus avoiding two intersections along Aldington Road, thereby minimising traffic at the Aldington Road intersections. We note the DCP seeks to discourage and minimise the depth of excavation and retaining walls and by moving this road further south, to align with Abbott Road this outcome will be achieved.

A final and critical point on the road network, that **MUST** be addressed in the DCP, is the interconnecting roads between properties and adjoining developments. The connecting roads need to be constructed to boundaries of adjoining developments, thus avoiding the ransom strip scenario, whereby development will depend on the whim of the adjoining property owner that controls the road access, and therefore, developments can be stifled for years. This situation will be repeated through the precinct time after time. Pazit is in this precarious position with no direct access and dependant on adjoining developers to grant access and therefore, have no timeframe or indication when we can commence any industrial developments, this situation is untenable.

Service Hub

The service hub location we submit, should have flexibility to be located further to the east where it would have more exposure and will service the industrial workers as well as the rural residential community, therefore, it would be better patronised and more commercially viable enterprise.

Interface Transition Zone

We have prepared visual analysis reports for the transition zone interface, between rural residential properties and the Pazit industrial lands. These reports by Urbain Architectural and P.T.I. Architects have prepared contextual and visual impact statements and were carried out from multiple viewpoints taken by drones from adjoining properties all along this transition zone and 3D models of buildings super imposed on these viewpoints. All these visual analysis confirm the DCP figure 11 showing the earth mound with extensive landscaping for screening and also providing an effective noise barrier, between the industrial and residential uses. The treatment as proposed in the DCP figure 11 is satisfactory to screen the potential impact of buildings from adjoining neighbours.

Pazit has an interface connectivity on its northern boundary, with the Goodman Developments and also has a landscape mound, similar to figure 11 in the DCP, this mound was constructed in 2018 by Goodman and serves the dual purpose to attenuate noise and camouflage the buildings behind. The Department, should review this mound and utilise as a reference for future interface transition zones.

Trunk Drainage Infrastructure

As noted on figure 6 of the DCP, the drainage line H03 on ground, is a superficial watercourse with predominately, no formed embankments other than the banks around the immediacy of inline dams, this watercourse as indicated H03 has no defined banks, water discharges over a wide area of low points on the land and travels the route to the north and thereafter northwest direction. The water flow needs to be incorporated into the road drainage system, to be captured and further treated in the stormwater basin system.

Floor Space Ratio (FSR) Building Area

We note that the DCP there is no identified FSR or building area nominated on blocks of land, Pazit is proposing a small lot subdivision of lots, upwards of 1,500sqm and potentially several hundreds of these lots in the development to be sold to businesses or individuals. Where they would build their own factory or have it built for them. This is a different market than the corporate client, which requires a large warehouse covering many thousands of square metres, thereby having more flexibility on these larger lots, than the small 1,500sqm lot.

Our small lot buyers will want to know categorically, the area of land of the lot that can be utilised for building and we need to be able to respond with some clarity and certainty of the usable area. Therefore, some mechanism needs to be inserted in the DCP to allow the building area to be determined easily. Every purchaser of every small block of land would require this information prior to purchase. We submit this as a critical item that needs to be addressed.

We have progressively developed the Capitol Hill Estate, for 1 ha. lots, over 30 years, and now it is a benchmark for rural residential living in the region, with all the landscaping and prominent homes that are in the estate. Our current 120 ha. of industrial land holdings is a significant portion of the Mamre Road Precinct and we envisage this industrial component of Capitol Hill Estate to raise the bar. Therefore, we submit our concerns for your assessment, which we strongly feel these issues are imperative and left unchecked will have very real consequences in the orderly development of the Pazit land and therefore, the Mamre Road Precinct as a whole.

We strongly suggest that DPIE, review the landscape mound on our northern boundary, as potential reference and model, that could be used in the interface transition zones, which will occur many times throughout the Mamre Precinct and the Aerotropolis as well.

We thank you for the opportunity to comment.

Should you wish to discuss or clarify any points raised herein, please contact myself on 0410 539 007.

Yours Sincerely,
Dino Seraglio
Director Pazit Pty Ltd