

9 January 2020
16258

Mr Jim Betts
Secretary
Department of Planning, Industry & Environment
320 Pitt Street
Sydney NSW 2000

Attn: Emily Dickson – Planner, Key Sites Assessments

Dear Emily,

RE: Response to Request for Information for SSD 8858 & SSD 5175 MOD 5

Ethos Urban has prepared this letter on behalf of Frasers Property Australia in response to your letter dated 28 November 2019 and the associated submissions received during the exhibition period of SSD 8858 and SSD 5175 MOD 5, relating to Stage 2 of the Eastern Creek Business Hub development.

The project team has considered all comments raised in the submissions and by the Department, and the following response has been formulated to assist with the assessment of SSD 8858 and SSD 5175 MOD 5.

This response to SSD 8858 and SSD 5175 MOD 5 is accompanied by the following supporting documents:

- Updated Concept Masterplan prepared by I2C (**Attachment A**);
- Updated Economic Impact Assessment prepared by HillPDA (**Attachment B**);
- Updated Operational Management Plan prepared by Frasers Property Australia (**Attachment C**);
- Updated Traffic Impact Assessment prepared by CBRK (**Attachment D**);
- Updated Signage Plans prepared by I2C (**Attachment E**);
- Updated Landscape Plans prepared by Arcadia (**Attachment F**);
- Updated Architectural Plans prepared by I2C (**Attachment G**);
- Updated Noise Impact Assessment prepared by Acoustic Logic (**Attachment H**); and
- Updated Civil Engineering Drawings and Report prepared by AT&L (**Attachment I**).

Since submission of the amended scheme, minor amendments to the design have been made to incorporate changes required by one of the major tenancy lessees and to respond to matters raised by Council and the Department. The changes include:

- Building's 1 and 2 have been reconfigured slightly to align with the tenant's operational requirements and to align with the Sydney water sewer design. This has resulted in an additional 40m² of GFA across the site with Building 1 increasing by 140m² of GFA and Building 2 decreasing by 100m²;
- The sewer alignment at the north eastern corner of the site has resulted in a reduction to Building 2;
- Civil levels have been updated to align with site conditions and to facilitate a single finished floor level to reduce overall cut/fill requirements;
- Loading bays have been introduced for Buildings 2 and 3, and three car spaces relocated from the front of Major 1 tenancy to the southern end of Building 2; and
- Minor changes to façade materiality.

The following table provides a response to the Department's request for information letter and all submissions made in relation to SSD 8858 and SSD 5175 MOD 5.

Table 1 RFI Response Table

Comment	Action
Department of Planning, Industry and Environment	
SSD 5175 MOD 5	
Concept Plans Update the 'Concept Masterplan' to clarify that the uses associated with legend item '9' apply to Lot 1 only. It is noted the legend currently indicates these uses (specialised retail, indoor recreation centre and vehicle repair station) are also proposed for Lot 3.	The Concept Masterplan has been amended, dividing the uses contained in legend item 9 to two separate legend items (item 9 and 10). Indoor recreation and vehicle repair station have been reallocated to legend item 10. These uses are confined to Lot 1 as illustrated in the Updated Concept Masterplan (see Attachment A).
Economic Impact Assessment Provide further detail of the potential for growth of nearby retail centres including: - what is envisaged for these centres under current planning controls - the existing development of Doonside and Rooty Hill and the potential for growth, noting Council comments that Doonside and Rooty Hill are underdeveloped - accurate existing retail floor space for nearby centres. Confirm the assessment of the redirection of turnover in the updated EIA is assessed for 2021, as Table 1 is titled 2020.	The Economic Impact Assessment has been updated by HillPDA and provided at Attachment B . The updated report includes an assessment of Doonside and Rooty Hill overtime and the retail floor space estimates used are based on industry standard practice. The assessment continues to conclude that the proposed increase to GFA for Lot 1 is insignificant in context of the development and that the trading impacts on existing centres would be inconsequential over time.
SSD 8858	
Development staging Provide further details about the staged construction and occupation of each building in Lot 1, as mentioned in the RtS report. Include: - an indicative outline of the proposed staging order for the three specialised retail buildings - which elements of the proposal will be delivered as part of stage 1 - how areas of the site to be constructed later will be managed.	The development may be constructed in stages, including: Stage A: Building 1 and Pad 1 services built first, with completion targeted for late 2020 or early 2021; and Stage B: Buildings 2 and 3 completed six to 18 months after Stage A, with completion targeted for mid to late 2021. If this staging occurs, the following measures will be implemented to manage the staged construction: - Hoardings or site fencing will be installed around buildings 2 and 3 to provide separation from public areas; - Traffic management will be employed to ensure safe interface with construction vehicles and the public; - A portion of the car park will be included in the fenced off area for construction vehicles; and - A detailed construction management plan will be prepared by the appointed principal contractor.
Access and Parking Clarify the arrangements for loading and unloading for buildings 2, 3 and the pad site. In particular: the inconsistencies in the RtS and the Operational Management Plan. The RtS notes smaller service vehicles will service buildings 2, 3 and the pad site outside operating hours. However, the proposed delivery hours are 7am to 10pm. In addition, the Operational Management Plan indicates deliveries will be completed by 5pm on Sundays.	The loading arrangements for Buildings 2, 3 and the pad site are clarified in the Updated Operational Management Plan provided at Attachment C . These buildings will be serviced outside of the main centre trading hours but within the overall delivery hours of the centre (e.g. between 7.00am and 8.30am or 5pm and 10pm).

Comment	Action
indicate where the smaller service vehicles will park and demonstrate there is sufficient space for these vehicles to manoeuvre within the carpark.	Two new loading bays for smaller service vehicles are proposed to the west of Building 2 and south of Building 3. The Architectural Plans and Traffic Impact Assessment have been updated to reflect this (Attachments G and D). The Traffic Impact Assessment includes swept path diagrams which demonstrate that there is sufficient space for these vehicles to manoeuvre within the carpark.
Traffic report Update the GFA figures associated with the proposal at paragraph 1.6. It is noted the GFA figures add up to 11,598 m², which is greater than the proposed GFA of 11,358 m² - Update the parking requirements at paragraph 2.13, which rely on the incorrect GFA figures - Provide further detail of expected frequency of loading/delivery and waste vehicle movements to service the site - Clarify how the indoor recreation centre traffic generation rate has been developed - Update the key findings of the Traffic Report at paragraph 2.47 to correctly refer to the proposed GFA and uses at Lot 1.	An updated Traffic Impact Assessment has been prepared to respond to these matters (Attachment D).
Signage Provide additional justification for the signage zones on the front and rear of the three specialised retail buildings having regard to the private domain signage controls within the Design Guidelines, including: - advertising signage for the business hub should be kept to a minimum - for single developments the total permissible signage and advertisements are not to exceed 1 sqm of advertising per 3m of street frontage.	The proposal seeks to strike a balance between minimising the overall quantum of advertising signage whilst providing for the requirements of the specialised retail tenancies and general wayfinding. It is noted that the change in layout of the centre from one large specialised retail centre building to three smaller buildings, results in additional building frontages (most of which are internal to the site). The proposal allows for each tenant to have one individual front and rear sign which is considered appropriate for a development of this nature and use, and is in line with other comparable large format retail centres. The proposed signage is integrated into the architectural form of the building and their scale, form and proportion is appropriate for the setting and will contribute to the visual interest and viability of the site. The signage will not obscure or compromise any important views. Notwithstanding, the proposed signage strategy has been amended (Attachment E) to reduce the size of signs across the site in response to this issue. The proposal reduces the amount of road facing signage from 350sqm to 227sqm which complies with this control based on a total road frontage of 750m. It is noted that this calculation is based on road facing signs and not inward facing signs which is considered consistent with the intent of the control in context of the modified built form.

Comment	Action
Landscaping - Provide detail of the proposed green walls on the detailed landscape plans, as shown on the architectural and concept landscape plans - Clarify if trees are proposed to be planted between the northern carpark and internal access road. It is noted the concept Tree Strategy Plan, page 12, shows Eucalyptus moluccana (red circle) to be planted in the landscaped area between the carpark area and internal access road. On the Landscape Masterplan, number 200, no planting is shown in this area.	Arcadia have prepared Updated Landscape Plans which are included at Attachment F. Further detail has been provided regarding the proposed green walls and the Eucalyptus moluccana trees located between the carpark area and internal access road have been removed.
Plans - Provide additional detail of the concrete feature wall proposed to match Stage 1 - Provide additional 3D street views as follows: - from within Lot 2, as it is noted the 3D Street view – new access road intersection provides a view of Lot 2, rather than Lot 1 - a view of Building 3, showing the proposed signage on the RHRS elevation.	Amended Architectural Plans and 3D street views are provided at Attachment G.
ESD Expand on the proposed rainwater collection methods, noting Council comments about the size of the proposed rainwater tanks.	Rainwater tanks will be supplied from the roof drainage system. The rainwater tank sizes will be dependent on the tenants' usage and the practicability of the tank/roof sizes. Both issues will be confirmed and documented in detailed design and will be generally in accordance with Council's DCP and stormwater requirements.
Footpaths Clarify if footpaths outside the site are to be provided as part of the application, as the landscape concept plan shows pedestrian footpaths, however the RTS report indicates the provision of footpaths within the road reserve as part of the WAD between Frasers and RMS.	Footpaths outside of the site will be provided as part of the WAD between Frasers and RMS. The footpaths are shown on the landscape plans for reference.
Noise Impact Assessment Update the assessment of car parking facilities (section 6.2), as the report references the 'proposed ALC Document project with 401 car parking spaces', which is not the subject site.	This has been corrected in the Updated Noise Impact Assessment (Attachment H).
Blacktown City Council	
Planning matters The HillPDA assessment still does not adequately address possible impact on nearby centres, relying on 'Approx Retail Floor Space' (page 3) of existing centres and fails to consider the potential growth of centres. As previously indicated, the majority of Blacktown's city centres have potential for growth, in particular both Doonside and Rooty Hill have significant potential due to the existing centres being underdeveloped. Whilst the impact on the current levels of trade of those centres might be considered to be 'low', there appears to be no acknowledgement of the possible impact on the potential growth of those centres.	Refer to Attachment B. The sizes of the retail centres assessed were sourced from Property Council of Australia Shopping Centre News and HillPDA surveys (both physical surveys on site and by measurement from aerial photography using Nearmap software). The areas are presented in round figures as information is generally not available to provide exact areas. This methodology is in line with standard industry practice.
It should also be noted that there is still a reference on pages 3 and 4 of the HillPDA letter which refers to Minchin Drive. That 'centre' was rezoned to R2 under BLEP 2015.	The Minchin Drive centre that is referenced is zoned B1 under the Blacktown LEP 2015.

Comment	Action
Drainage matters The drainage plans submitted with SSD 5175 need to be amended and modelling is required. Information required includes: - A gross pollutant trap nominated by Henry and Hymas as a Rocla CDS sized for a minimum 6 month flow has not been provided. Provide details and calculations. - On at&I drawing DAC011 (B) it shows 3 x 5000 L rainwater tanks (RWT) (15,000L total). For a development this size the RWT would be expected to be ten times that or more. - Design the RWT to receive the flow off every roof area. In this design 95% of the roof bypasses the RWT. - For industrial/commercial development a minimum of 80% of the non-potable water uses on site is to be met through rainwater. This is to be assessed using the node water balance in MUSIC. Allow for a 20% loss in rainwater tank size volume in MUSIC to that shown on the design plans below the overflow invert to allow for anaerobic zones, mains water top up levels and overflow levels. Where this is difficult to achieve the 80% reuse consider waterless urinals. Provide the MUSIC model electronically. - For industrial/commercial development allow for internal rainwater reuse of 0.1 KL/day per toilet/urinal. Detail all toilets from architectural plan. - For watering landscaped areas only (excluding turf areas) e.g. common areas, allow 0.4 kL/year/m² as PET-Rain. This is to include the bioretention filter area that this site drains to detailed on the Henry and Hymas plans. - There should be schematic showing how the rainwater tank will work with meters to calculate non-potable usage, control panels, alarms, etc. and detail how the automatic solenoid mains water bypass will operate.	Updated Civil Engineering Drawings and Stormwater Report are provided at Attachment I. The gross pollutant trap nominated by Henry and Hymas' report will be replaced by Enviro-pods (for all surface inlet pit and kerb inlet pits) or approved equivalent. To comply with Green Star, a total of 30,000L storage will be provided. This comprises 20,000L tanks for building 1 and 5,000L tanks for each of building 1 and 2. The roof catchment to the RWT will be confirmed at detailed design stage in consultation with Council. The design will generally be in accordance with BCC DCP and Stormwater requirements. The bioretention filter area will not be irrigated and will not form part of the landscaped area calculation. A schematic plan for the rainwater and metering will be provided as part of the detailed design.
RMS	
1. All buildings, structures (other than pedestrian footpath) and signage, together with any improvements integral to the future use of the site are wholly within the current freehold property (unlimited in height or depth), along the Rooty Hill Road South boundary.	Noted.
2. Detailed design plans and hydraulic calculations of any changes to the stormwater drainage system are to be submitted to Roads and Maritime for approval, prior to the commencement of any works. Documents should be submitted to Development.Sydney@rms.nsw.gov.au	Noted.
A plan checking fee will be payable and a performance bond may be required before Roads and Maritime approval is issued.	
3. A Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council for approval prior to the issue of a Construction Certificate.	Noted.

Comment	Action
4. A Road Occupancy Licence (ROL) should be obtained from Transport Management Centre for any works that may impact on traffic flows on Rooty Hill Road South during construction activities. A ROL can be obtained through https://myrta.com/oplinc2/pages/security/oplincLogin.jsf	Noted.
5. All construction vehicles are to be contained wholly within the site and vehicles must enter the site before stopping. A construction zone will not be permitted on Rooty Hill Road South boundary.	Noted.
6. The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements in relation to landscaping and/or fencing, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1- 2004, AS2890.6-2009 and AS 2890.2 – 2002 for heavy vehicle usage. Parking Restrictions may be required to maintain the required sight distances at the driveway.	Noted.
7. The swept path of the longest vehicle (including garbage trucks, building maintenance vehicles and removalists) entering and exiting the subject site, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS.	Noted.
8. The proposed development will generate additional pedestrian movements in the area. Pedestrian safety is to be considered in the vicinity.	The Updated Traffic Impact Assessment prepared by CBRK considers pedestrian safety in the vicinity of the site (see Attachment D).
Office of Environment and Heritage	No action.
Transport for NSW	No action.
NSW Rural Fire Service	No action.

We trust that the information provided satisfies the requirements of the additional information request. We look forward to the Department progressing the assessment of the application and to receiving a set of draft conditions for consideration in due course.

Should you have any further queries about this matter, please do not hesitate to contact the undersigned.

Yours sincerely,



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