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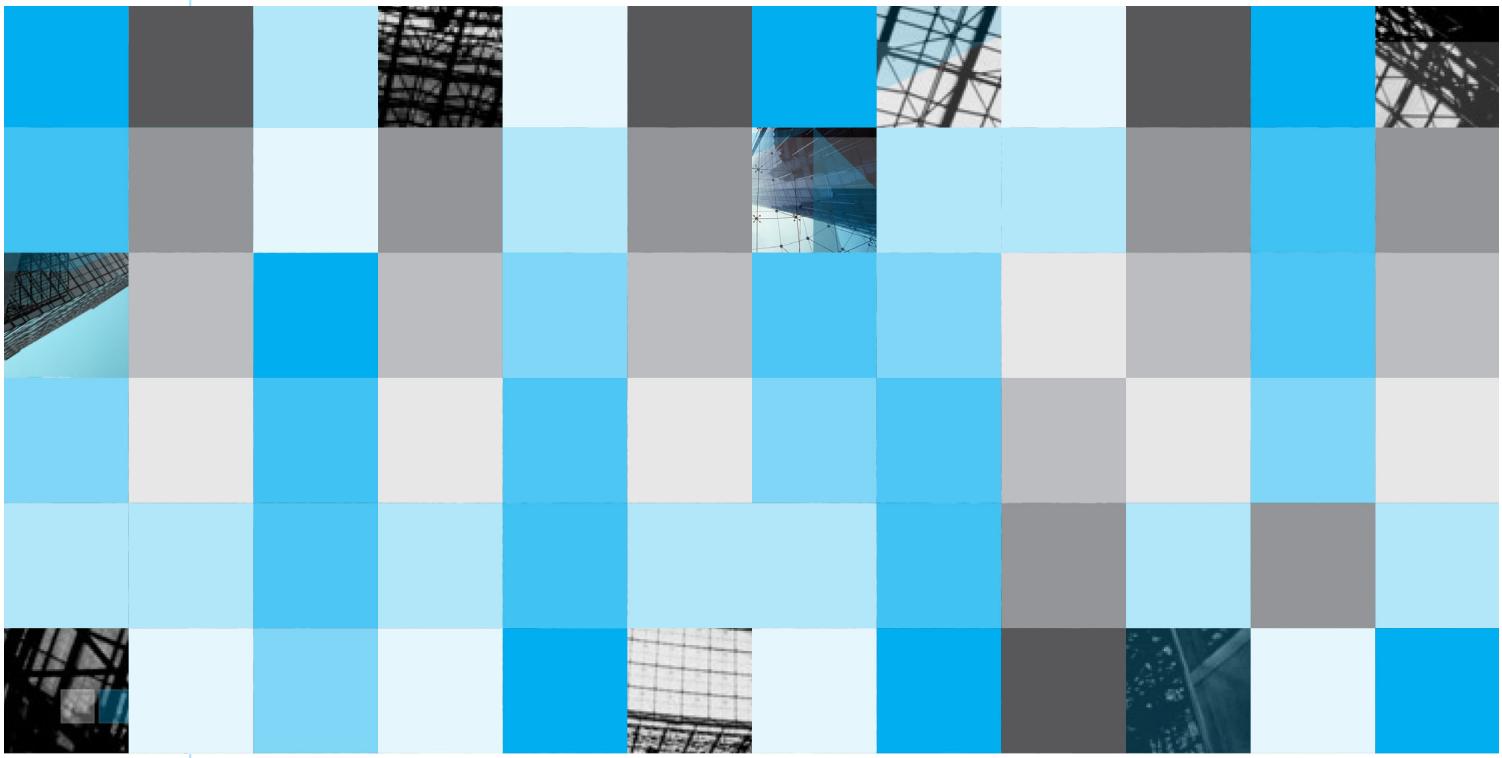

Lot 3 Bringelly Road Business Hub, Bringelly Road, Leppington

Response to Submissions (SSD 10366)

SUTHERLAND & ASSOCIATES PLANNING

ABN 14 118 321 793 ACN 144 979 564

Response to Submissions (SSD 10366)

LOT 3 BRINGELLY ROAD BUSINESS HUB, BRINGELLY ROAD, LEPPINGTON

Construction of a new Hardware and Building Supplies and Garden Centre including Car Parking and Signage

January 2020

Prepared under instructions from
Bunnings Properties Pty Ltd

by

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CONTENTS

1.0 INTRODUCTION

This report provides a response to the issues raised by the Department of Planning, Industry and Environment, other government agencies and the public in response to a State Significant Development Application for the purposes of a development which involves the construction of a new hardware and building supplies and garden centre including car parking and signage at Lot 3 Bringelly Road Business Hub, Bringelly Road, Leppington.

The response is accompanied by an amended landscape plan as a response to the various issues which have been raised. The amendments include additional tree planting within the car parking area as well as a change to some of the plant species. No other amendments are proposed.

This report is accompanied by the following documentation:

- Amended Landscape Plan: John Lock & Associates
- Traffic and Parking Response: TTPA
- BDAR Waiver Report - Sclerophyll
- Jemena Pipeline Risk Mitigation letter - Systra

The amended application has resolved the issues of concern provided by the Department of Planning, Industry and Environment and has responded to the issues raised by Liverpool City Council as well as other government agencies and the public.

The amended application represents an improved outcome in response to the opportunities and constraints of the site and the amended proposal will contribute positively to the emerging character of the locality.

2.0 AMENDMENTS

The following amendments have been made to the proposed development:

- The provision of tree planting within the hard stand car park area has been increased, with 6 additional Blueberry Ash Trees within the car park which grow to a height of .6 metres.
- The replacement of the previously proposed Crepe Myrtle trees (x 14) within the car park with Blueberry Ash Trees (x 14).

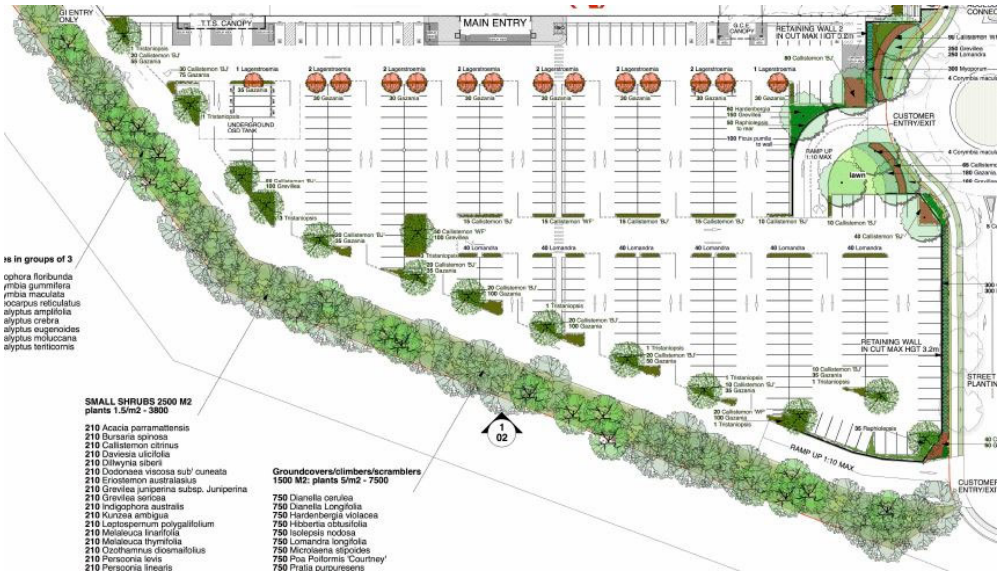

Figure 1:

Initially proposed landscape design for car park

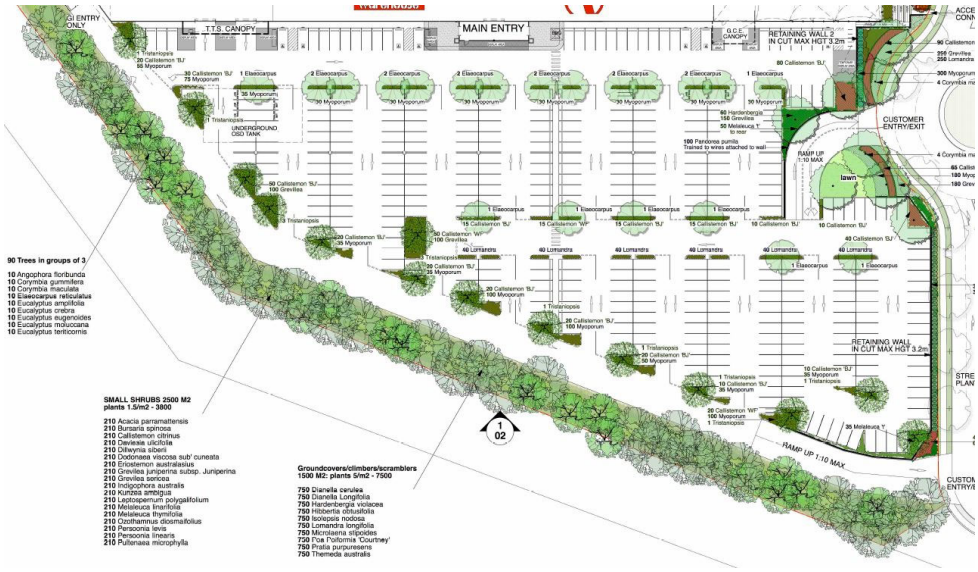

Figure 2:

Amended proposed landscape design for car park

3.0 DEPARTMENT OF PLANNING, INDUSTRY & ENVIRONMENT

The Department of Planning, Industry and Environment raised issues in relation to the subject application in correspondence dated 20 December 2019. These issues are addressed below.

3.1 Site Development Guidelines

> The EIS does not address all of the Site Design Guidelines approved for the Bringelly Road Business Hub (BRBH). As such, please provide an assessment against the entire document, and if required, make changes to any of the supporting documentation for the Development Application (architectural plans, landscape plans etc) to reflect the objectives and controls.

An updated assessment of the proposal against the Updated Site Design Guidelines, prepared by JBA Urban Planning Consultants, dated June 2015, is provided below:

Element	Numerical Requirement	Compliance
2.1 SETBACKS		
Objectives: 1. To encourage buildings that respond to the relative position of the site. 2. To provide an open streetscape with substantial areas for landscaping. 3. To ensure the provision of appropriate buffers to Bringelly Road, Stuart Road and internal roads that softens the visual impact of the development whilst allowing visibility to appropriate development.		
Controls		
1	a) Buildings are to be setback by: · 20m from Bringelly Road; · 15m from Stuart Road; and · 10m from the internal road (former Bringelly Road).	Yes (other than a very minor point encroachment from the internal road of approximately 3m due to the radius of the road).

	(b) At least a third of the above building setbacks are to be landscaped. The non-landscaping component of the setback may be used for access driveways and off-street parking areas within the front setback if it can be demonstrated that the location of the car parking area:
	• promotes the function and operation of the development;
	• enhances the overall design of the development by implementing design elements including landscaping, that:
	  • will screen the parking area;
	  • is complementary to the development; and
	  • does not detract from the streetscape values of the locality
		Yes

Element	Numerical Requirement	Compliance
2	Storage of any kind is not permitted within the building setback area.	No storage is proposed in the setback areas.
3	Zero side and rear setbacks are permitted between allotments subject to meeting fire rating requirements.	The proposal exceeds a zero side and rear setback.
4	Pedestrian access should be provided to all landscaped setback areas for maintenance and security purposes.	Pedestrian access is possible to all landscaped setback areas.
5	A setback of 15m from the northern boundary (where it adjoins the riparian corridor associated with Bedwell Park wetland area), and 10m from the eastern boundary.	N/A
2.2 SITE COVERAGE		
Objectives: 1. To ensure that adequate area is available to accommodate landscaping, open space for employees and screening of loading and storage areas. 2. To ensure that adequate area is available for driveways and access, onsite parking and manoeuvring of vehicles. 3. To achieve appropriate building setbacks that are landscaped to ensure integration with streetscape and street tree planting.		
Controls		
1	Site coverage is not to exceed 50% for Large Format Retail development. Site coverage includes the footprint of all buildings and canopy areas (excluding hard stand areas).	Yes. Site coverage is 42.9%.
2.3 BUILT FORM AND DESIGN		
Objectives 1. To encourage buildings that are of architectural merit, diversity, scale and high quality built form. 2. To encourage a built form that contributes to the visual amenity of the site.		
Controls		
1	Applicants are to give consideration to optimising building orientation and siting to natural elements such as topography, wind and sunlight, energy efficiency and to maximise weather conditions for loading and unloading.	The warehouse is aligned to the eastern boundary of the site so that it is grouped with the other buildings further to the east which is the optimal building location for the topography of the site.
2	Where practical, buildings are to sit parallel to side boundaries and retaining walls.	The building is parallel to the eastern side boundary.
3	Applicants are to consider a range of fascia treatments, façade treatments, rooflines and	A detailed Visual Impact Assessment prepared by UrbanAC accompanies this

Element	Numerical Requirement	Compliance
	building materials to reduce the impact of walls facing the street	submission and provides a comprehensive urban design analysis and demonstrates that the proposal represents an appropriate response to the emerging character and context of the site as well as the framework provided by the Concept Plan.
4	The maximum building height is 14m. Taller buildings will be permitted where it can be demonstrated that: • the proposed height is in keeping with the character of the locality; • the building, or any part thereof, is not visually obtrusive; and • the overall design of the development, including landscaping and • building materials, reduces the impact of height and bulk of the building	The building does not exceed 14 metres in height.
5	Goods, plant, equipment and other material resulting from the development are to be stored within a building or will be suitably screened from view from residential areas	Goods, plant, equipment and other material are either stored within a building or are at the rear of the building and not generally visible from residential areas.
6	Development which can be viewed from residential properties will require special attention regarding the scale, form and external finishes of buildings, to reduce their visual impact.	The building is not readily visible from the populated residential areas which are further to the east of the Business Hub.
7	Development should incorporate the Crime Prevention Through Environmental Design (CPTED) principles where appropriate.	Crime Prevention Through Environmental Design (CPTED) principles have influenced the design of the proposal as addressed in Section 9.6 of the EIS.
8	Prominent elevations, such as those with a frontage to the street or public reserves, must present a building form of significant architectural and design merit	A Visual Impact Assessment prepared by UrbanAC accompanies this application, including photomontages, which addresses the visual impacts of the proposal having regard to the Design Guidelines which apply to the site.
9	Large elevations should be articulated by structural variations and/or a blend of external finishes. Additionally, the landscape design should consider the scale of the building and where appropriate, the location of and careful selection of plants may aid in reducing the bulk and scale of the building form.	The large elevations of the proposed building are a function of the nature of the proposal for a Bunnings warehouse. Nonetheless, the facades are articulated by signage and the centrally located building entry. The landscape design includes extensive plantings around the perimeter of the site and within the car park which will

Element	Numerical Requirement	Compliance
		serve to mitigate the scale of the proposed building form.
10	Particular care should also be taken in: • designing roof elements; and • locating plant and mechanical equipment including exhausts, so as to screen them from a public place	Plant and mechanical equipment are located to the rear and side of the building such that they will not be readily visible from the front street.
2.4 EXTERNAL MATERIALS AND COLOURS		
Objectives 1. To encourage a high standard of contemporary architectural design, utilising quality materials and finishes appropriate to the locality. 2. To ensure that new development contributes to the creation of a visually cohesive urban environment. 3. To encourage the innovative use of materials		
Controls		
1	Highly reflective materials, including white or off-white metal colours should be minimised. In this regard, the roof material(s) to be used shall not be reflective	The colours and materials adhere to the Bunnings corporate colours and materials. There are no highly reflective materials and minimal use of white colours.
2	Courtyard and screen walls should generally be in the same material as the building facades.	Noted.
3	The development is to incorporate a variety of external finishes in terms of both colour and type of material used. The external finishes of the development are to be: • made from durable high quality, low maintenance materials; • compatible with the overall design and form of the development; • selected for all built forms to ensure the entire development presents a homogeneous form; • considered for their ability to provide visual relief in large wall surfaces and elevations; and • selected to ensure the development complements the surrounding environment while reducing the temptation to vandalism and graffiti	The development incorporates the Bunnings corporate external finishes which comprise highly durable and low maintenance materials which achieve a coherent and recognisable outcome suitable for the proposed use.
2.5 ENTRANCE TREATMENT		
Objectives		

Element	Numerical Requirement	Compliance
1. To provide an active frontage and level of surveillance to the street. 2. To ensure an identifiable entrance point to the property and building.		
Controls		
1	Entries to buildings should be clearly visible to pedestrians and motorists and be integrated into the form of the building.	The entrance to the building is a highly prominent feature which is clearly visible.
2	Architectural features are to be provided at ground level and are to address the primary street frontage	The proposal provides an appropriate response to the street having regard to its nature and character of a bulky goods and hardware retail facility.
3	All entrance treatments, such as directory boards, must be located on private property, with appropriate management arrangements to ensure that the ongoing maintenance of such treatments.	Noted.
4	Entries should be articulated through the use of colour, signage, lighting, material change and texture, and strengthened through landscape design	The primary building entry is articulated by the well recognised Bunnings portico entry feature.
2.6 STAFF AMENITIES		
Objectives 1. To provide facilities for workers.		
Controls		
1	Outdoor spaces should be provided for staff. The spaces should be easily accessible from the buildings and should maximise site opportunities such as views and solar access.	The generous landscaped areas within the site provide sufficient outdoor space for staff.
2	Opportunities for shade should be provided in outdoor staff amenity areas.	There is substantial planting within the landscaped areas.
3	Within each development shower and change facilities shall be provided for staff. This is designed especially to encourage employees to access the site by bicycle or on foot.	The proposal incorporates shower and change facilities for staff within the mezzanine level.
2.7 FENCING AND WALLS		
Objectives 1. To provide an appropriate level of security for property owners and contribute to the amenity of the Precinct. 2. To encourage pedestrian access to businesses from the street. 3. To ensure that fences and walls respond to the topography, streetscape and landscape.		

Element	Numerical Requirement	Compliance
4. To enhance the visual outlook of adjoining rural residential properties.		
Controls		
1	Fencing may be positioned along the front property boundary only if: • it is decorative fencing that has an open style appearance (metal, pool type fencing); and • the fencing is complementary to the landscaping	There is no fencing proposed along the front boundary.
2	Front fences higher than 1.2m shall be consistent with the following: • maximum height of 2m; • transparent; and • dark colour.	N/A
3	Fences should not prevent surveillance by the building's occupants of the main open or communal areas within the property or street frontage.	N/A. Fencing is only located along a part of the rear and also along the side boundary of the site.
4	Chain wire, metal sheeting, brushwood or electric fences are not permitted.	A mesh style metal fence is proposed along part of the rear boundary and the side boundary which is suitable for the location and purpose of the fence.
5	Cyclone fencing may be used on side and rear boundaries which do not front roads	See above.
6	Eastern facing retaining walls, are to be suitably landscaped as 'green walls' or screened by landscaping where possible to reduce visual impact.	All retaining walls are located within a landscaped setting to minimise their visual impact.
7	Retaining walls are to be integrated with fencing and buildings, with no fences located along walls	See above.
2.8 SIGNAGE AND LIGHTING		
Objectives 1. To promote an integrated design approach to all signage in character with the locality, and it's architectural and landscape features. 2. To prevent the proliferation of advertising signs. 3. To prevent distraction to motorists and minimise the potential for traffic conflicts.		
Controls		

Element	Numerical Requirement	Compliance
1	1. All advertising is to be: • constructed of high quality, durable materials; • considered in conjunction with the design and construction of buildings; and • contained wholly within the site	The proposed signage is an integrated and fundamental component of the branding for the Bunnings warehouse which is provided on the walls of the building.

2	In the case of strata titled factory units:
	• each factory unit development should have a directory board within or near the landscape area listing each firm and their unit number within the complex;
	• subject to compliance with the exempt development requirements; and
	• each firm is entitled to have:
	  • a sign located on or over the door of the unit so occupied; and
	  • another sign placed on the face of the building(s).
		N/A

3	Lighting must be provided to external entry path, common lobby, driveway and car park to a building using vandal resistant, high mounted light fixtures	Noted. Compliance will be achieved.
4	The lighting in car park areas must conform to AS 1158.1, 1680 and 2890.1.	Noted. Compliance will be achieved.
5	External lighting must give consideration to the impact of glare on adjoining residents.	Noted. There are no adjoining residents.
6	Solar, LED lighting , and voltaic cells are to be used where feasible for powering lighting and signage.	Noted.
2.9 LANDSCAPING		
Objectives 1. To encourage a well-designed, legible and cohesive landscape framework for development/project application. 2. To ensure landscape plans submitted to Council are of a high standard, and that all landscaping is carried out and maintained to an appropriate level on completion of the development. 3. To screen undesirable views and minimise the visual impact of hard surface areas. 4. To encourage and build upon the landscape of the adjoining Bedwell Park Westland area and existing vegetation. 5. To encourage the use of both hard and soft landscape to assist in creating comfortable micro climate conditions, and enhancing the environmental amenity of the development and the Precinct.		

Element	Numerical Requirement	Compliance
Controls		
1	A detailed Landscape Plan shall accompany a development application for future development for buildings on the site. The Landscape Plan shall be prepared by a suitably qualified Landscape architect.	A Landscape package prepared by John Locke & Associates accompanies this application and addresses these requirements.
2	The Landscape Plan shall be consistent with the site landscape plans prepared for the site by Arcadia Landscape Architecture dated December 2014	
3	Native species should be used due to their low maintenance, relative fast growth, aesthetic appeal and suitability to the natural habitat	
4	The landscape must conform to the bushfire requirements, specifically when planting within Defendable Spaces.	
5	Presentation of a building facade to the street should be complemented with appropriate vegetation. The visual impact of large expanses of wall should be reduced in scale by architectural treatment as well as by dense grove planting or other landscape design solutions.	
6	Landscape materials should cause minimal detrimental visual impact, and the use of subtle coloured materials and block or brick paving is encouraged. Paving and structures shall complement the architectural style of existing buildings	
7	Consideration should be given to solar access and energy conservation, with the appropriate use of deciduous trees	
8	Plant material in car parks should be used ameliorate views of large expanses of paved areas and parked cars, and to identify entrances to car parks.	
9	Island planting beds should be interspersed throughout large parking areas.	
10	Water Sensitive Urban Design (WSUD) techniques should be incorporated into planting and site design where feasible, such as harvest water and permeable paving	

Element	Numerical Requirement	Compliance
3.1 LOCAL ROAD NETWORK		
Objectives 1. To provide adequate vehicular entrance to and exit from the development in a manner that is safe for pedestrians and vehicles using the site and adjacent roadways. 2. To incorporate a road layout that is well connected, displays a legible street hierarchy that will accommodate anticipated traffic volumes and vehicle types, and permits access to allotments via roads. 3. To incorporate a road layout that provides safe access for the needs of all users including large trucks, pedestrians and cyclists.		
Controls		
1	Development should comply with the road design principles identified in Roads and Traffic Authority, Road Design Guidelines; and Roads and Traffic Authority, Guide to Traffic Generating Development (1993) in relation to the number, locations and design of any vehicular entry and exit points and/or certain road construction works.	N/A. Internal roads will be completed as part of existing Concept Approval
2	All roads and intersections within any internal road network shall incorporate traffic facilities that promote safe and efficient traffic movement, speed control and maximise landscape opportunities	N/A. Internal roads will be completed as part of existing Concept Approval
3	The Internal road design shall be consistent with Figure 2.	N/A. Internal roads will be completed as part of existing Concept Approval
3.2 SITE ACCESS AND MOVEMENT		
Objectives 1. To ensure the safe and efficient movement of vehicles and pedestrians within a development site.		
Controls		
1	Truck access, manoeuvring and loading areas are to be separated from car parking areas.	Noted. Compliance is achieved.
2	Development shall, where appropriate, be designed to: • allow all vehicles to either leave or enter the site in a forward direction; • accommodate heavy vehicle parking and manoeuvring areas; • avoid conflict with staff, customer and visitor vehicular movements; and • ensure satisfactory and safe operation with the adjacent road system	Noted. Compliance is achieved.

Element	Numerical Requirement	Compliance
3	In determining access, servicing and car parking requirements, Council will take the following into consideration: • the location, type and scale of the proposed development; • the compatibility of the location and design of the car park with adjoining properties; • the Traffic Authority Guidelines and comments of the Local or Regional Traffic Committee(s); and • the potential for the land use to generate heavy vehicle movements. • Full details of the volume, frequency and type of vehicle movements shall be submitted with future applications.	Noted.
4	Where the nature of the development will attract clients/visitors to the site, the following elements shall be included in the car park design: • the internal (vehicular) circulation network is to be free of disruption to circulating traffic and ensures pedestrian safety; and • the movement of pedestrians throughout the car park is clearly delineated by all users of the car park and minimises conflict with vehicles.	Noted. Compliance is achieved.
5	All internal two-way roadways are to have a minimum width of 7m. Lesser widths may be considered for one-way internal access roads. All internal roadways, circulation and parking areas are to be sealed with a hard-standing, all-weather material	Noted. Compliance is achieved.
6	Direction arrows are to be shown on all internal roadways in order to satisfactorily facilitate the movement of vehicles	Noted. Compliance is achieved.
7	All loading and unloading must take place on-site. Adequate space is to be provided within the site for the loading, unloading and fuelling (if applicable) of vehicles	Noted. Compliance is achieved.
3.3 ON-SITE PARKING		
Objectives 1. To ensure that safe and sufficient car parking shall be provided on each lot to satisfy the likely peak parking demands of the development.		

Element	Numerical Requirement	Compliance
Controls		
1.	Parking is to be provided in accordance with the minimum requirements in Table 1. Large format retail – Minimum 1 space per 150sqm of GFA	A Traffic and Parking Impact statement addressing these matters accompanies the subject application. However, the use of GFA as a metric does not appropriately apply to a Bunnings warehouse as a significant amount of retail area does not constitute GFA. The retail floor area is approximately 17,144 square metres which would generate a minimum requirement of 114 car spaces. The proposal provides 373 car spaces which is considered necessary based on surveys of other comparable Bunnings warehouses.
2	Car parks, aisles and manoeuvring areas shall be designed with function and safety in mind, and have minimum dimensions in conformity with the Australian Standards 2890 - Parking Facilities. The relevant parts of this standard are AS2890. Off-street parking, AS2890.2 – Commercial vehicle facilities, and AS2890.3 – Bicycle parking facilities.	Noted. Compliance is achieved.
3	Where parking spaces are to be provided for people with disabilities, these spaces are to be: • suitably located near entrances to the building, lifts and access ramps (if required); and • provided in accordance with AS1428.1 – Design for Access and Mobility	Noted. Compliance is achieved.
4	Parking facilities for commercial vehicles should be designed to accommodate the largest type of truck which could be reasonably expected to park on the site	Noted. Compliance is achieved.
5	All parking areas shall be constructed of hard-standing, all-weather material, with parking bays and circulation aisles clearly delineated.	Noted. Compliance is achieved.

3.2 Construction Timeframe

Please provide details on the expected construction timeframe for the proposed development.

The commencement of construction is unknown at this point in time and subject to commercial arrangements between ESR and Bunnings. Once construction commences, the construction is likely to take approximately 9 months to completion.

3.3 Trip Generation

> The EIS states the operational trip generation will be lower than what was originally calculated as part of the Concept Approval for BRBH, however no detail is provided to substantiate this. Please provide detail of the expected trip generation for weekdays and weekends.
>
> In addition, please provide detail on the expected trip generation during the construction phase of the development and an assessment of any impacts associated with this.

A detailed Traffic and Parking response prepared by TTPA accompanies this report which provides a comprehensive response to this issue. The Traffic Report submitted with the application did provide detail in relation to trip generation, and page 9 provides the assessed traffic generation rates (weekday PM and weekend) for:

- the envisaged 20,000m2 Bunnings assessed for the approved SSD Application
- the now proposed 17,258m2 Bunnings.

Further this is confirmed by the detailed extract from the SSD Traffic Report provided in Appendix B.

In relation to construction traffic, there could be a maximum of 30 - 40 workers on the site during the peak construction process resulting in some 30 - 40 workers cars arriving in the AM and leaving in the PM (i.e. 30 - 40 vtph) with potentially a maximum of 5 - 10 construction related trucks (i.e. max. during concrete pours) and it is noted that there will not be any requirements for any bulk excavation. Therefore:

- traffic movements during the construction process will only be some 10 - 20% of the operational traffic generation.
- the full traffic signal controlled access (as per that for the future operation) will be available for the construction process.

The construction activity will not result in any adverse traffic impact.

3.4 Impacts on Road Network

> The Traffic Impact Assessment (TIA) submitted with the EIS does not provide adequate information to demonstrate the proposed development will not generate impacts upon the local road network. As raised by Transport for NSW, it is requested you demonstrate safe and efficient access to the site, addressing the potential impacts of the operation of Bringelly Road, and an any potential queuing within the site, and within BRBH.

A detailed Traffic and Parking response prepared by TTPA accompanies this report which provides a comprehensive response to this issue. In summary, the traffic assessment for the approved Concept Plan was based on a "worst case" development scenario including 50,000 square metre retail (e.g. Ikea), a 20,000 square metre Bunnings, a service station and 2 fast food outlets as well as 48,000 square metre of light industry and provided traffic modelling for the 2031 future circumstance with the "worst case" development circumstance which demonstrated satisfactory operational performance for a number of scenarios of the access intersection.

The subject proposal will generate less traffic from this site than was anticipated by the approved Concept Plan and accordingly the proposal results in a reduced impact to the local road network than was anticipated by the approved Concept Plan.

4.0 OTHER GOVERNMENT AGENCIES

4.1 Liverpool City Council

Liverpool City Council provided a submission in relation to the subject development application in correspondence dated 19 December 2019. A summary of the issues raised and a response is provided below:

Issue	Response
Visual Impact Assessment	
Visual Impact Assessment in accordance with condition B6 of the Concept Plan SSD 6324. It is noted that the visual impact assessment provided with this request shows differences between the elevations which reflect the actually topography compared to the elevations in the architectural package which are drawn on level ground. This needs to be accounted for in the assessment of height of buildings and their impact to the visual transparency of the development. Also, the value of Figure 12 is questionable in terms of assessing how the development relates to the existing view from viewpoint E. Given the location of the development in the Western Sydney Parklands, Council recommends that the development provides a high level of established vegetation to the perimeter of the site to reduce the visual impact of the development in the vicinity. Landscaping shall also be maximised within the Car parking areas to provide as much shade as possible.	The architectural package provides internal elevations from within the site taken from the new ground levels immediately adjacent to each elevation. This is appropriate within the architectural package and demonstrates that a compliant height of less than 14 metres has been achieved. Conversely, the landscape package provides elevations from around the perimeter of the site which accurately and correctly depict the external presentation of the proposal. These are the elevations which have been utilised in the preparation of the Visual Impact Assessment, along with the photomontages, to accurately describe the visual presentation and impact of the proposal as viewed from outside of the site. Accordingly, the Visual Impact Assessment has appropriately taken topography into account and provides an accurate and comprehensive analysis of the proposal and demonstrates than appropriate urban design outcome will be achieved having regard to the emerging character of the Business Hub. As recommended by Council, the proposed development does provide a very high level of vegetation around the perimeter of the site to reduce the visual impact of the development in the vicinity, as well as internally within the car parking area to maximise shading, with an amended landscape plan accompanying this submission which has provided additional tree planting within the car park.
Site Access	
Assessment of the Traffic report provided is required to ensure Council's concerns in relation to access to the site has been adequately addressed.	Noted. Access to the site is as anticipated by the approved Concept Plan.
Urban Heat	
It is noted that the landscaping package provided appears to provide a significant level of vegetation surrounding the development to provide natural screening to break up the visual bulk of the	It is agreed that landscape plan as originally lodged provides a significant level of vegetation. Whilst a range of trees were also provided within the car

Issue	Response
development which is supported. Given that a large proportion of the site is comprised of the warehouse and open car park, in order to minimise the amount of urban heat caused by the level of hard surface, Council suggests that consideration be given to the provision of additional large canopy trees at the midpoints of the parking bays in the carpark. This will have the added benefit of providing amenity for customer parking. It is noted that this may require a reduction in the available parking spaces though it is noted that the level of parking shown is greater than the minimum required. It is also requested that consideration be given, as a minimum, to provide raised diamond shaped garden beds between car parking spaces so as to provide opportunities for the planting of additional canopy trees within the open at grade car park.	park area, the plan has been updated to add further trees in order to address this concern.
Energy and Water Conservation	
The recommendations of the August 2019 response in relation to energy and water conservation are reiterated	Noted. This is addressed in the EIS.
Development Contributions	
It is noted that the EIS has been amended as per the Council's August 2019 response. In addition to the above, Council requires that in order to ensure that the intensions of SSD 6324 are met that this development is to comply with the objectives and controls of BRBH Design Guidelines.	Noted. A comprehensive assessment against the objectives and controls of BRBH Design Guidelines is contained within this report
Engineering Comments	
Council's Land Development Engineering Section has reviewed the plans and have no objections to the development. The following engineering conditions are recommended to be included in any consent:	No objection is raised in relation to the imposition of these conditions which are accepted by Bunnings.

4.2 Transport for NSW

Transport for NSW provided a submission in relation to the subject development application in correspondence dated 16 December 2019. It is requested that the attached response from TTPA is not considered to have adequately addressed TfNSW requirements that Bunnings and its consultants would appreciate the opportunity to meet and directly discuss matter of concern with TfNSW officers.

A summary of the issues raised and a response is provided below:

Issue	Response
Active Transport Considerations	
Comment Current NSW policies reinforce the importance of walking and cycling to increase access to local centres and integrating transport with land use as part of the whole customer journey. The Environmental Impact Statement (EIS), and Traffic Impact Assessment (TIA), have not given full consideration to bicycle parking and end of trip facilities for staff and customers at the new Warehouse. Section 7.0 - Sustainable Travel Plan states that there will be provision of bicycle parking spaces and end of trip facilities, but no specific details are provided. Recommendation It is requested that the applicant be conditioned to provide bicycle parking and end of trip facilities for staff and customers in accordance with Liverpool City Council Development Control Plans, standards and guideline documents including: • Locate bicycle facilities in secure, convenient, accessible areas close to the main entries incorporating adequate lighting and passive surveillance and in accordance with Austroads guidelines; • Provide signage/marked walkways to the warehouse/retail outlet from the car park; and • Update Appendix B – Architectural package to show where these facilities will be located.	The proposal already provides end-of-trip facilities for staff in the mezzanine level. Bicycle parking is proposed to be provided with a series of hoops at the entrance to the building and Bunnings accepts a condition of consent for the installation of 6 bicycle hoops which is more than sufficient for staff requirements. In relation to visitors, due to the nature of the use as being hardware related products and bulky goods, cycling is not a common method of transportation used for visits to Bunnings stores and so the provision of bicycle parking, and in particular end-of-trip facilities, for visitors is not warranted.
Travel Plan	
Comment To better manage demand on the transport network, the recommendations below are provided to encourage the use of sustainable transport to the site, which will help reduce the use of single vehicle trips. Recommendation Prior to the issue of the first Occupation Certificate, the applicant shall prepare a Travel Plan in consultation with TfNSW for the proposed development which must be approved by TfNSW. The Travel Plan should:	Bunnings agrees to the imposition of a condition of consent to prepare a Green Travel Plan prior to the first Occupation Certificate. However, it is unnecessary to require this to be 'approved' by another government agency and Bunnings does not accept this recommendation and instead suggests that the Green Travel Plan is to be provided to the PCA prior to release of the Occupation Certificate. All of the suggested inclusions in the travel plan are accepted by Bunnings, with the exception of the last requirement for an annual monitoring, reporting and review process, which is considered onerous given the nature of the proposed use.

Issue	Response

• Support staff and visitors to prioritise access the site by public and active transport and minimise the proportion of single-occupant car journeys to the site;
• Include a Travel Access Guide – The Travel Access Guide needs to specify matters including, but not limited to, the following:
  • Suitable nearby drop-off/pick-up locations;
  • Identify areas where drop-off/pick-up is prohibited and instruct staff and visitors to avoid use of these areas;
  • Suitable nearby Taxi Zones;
  • Public Transport options in the vicinity of the site;
  • Pedestrian access to the site;
  • Bicycle Parking and cycleway networks to the site;
  • Access to the site for vehicles including parking arrangements; and
  • Servicing and loading arrangements.
• Establish mode share targets for staff and visitors for occupation and outline robust actions to achieve these targets;
• Appoint a Travel Plan Coordinator to oversee the implementation of the Travel Plan;
• Nominate the party/parties responsible for implementing the actions in the Travel Plan and its ongoing monitoring and review, including the delivery of actions and associated mode share targets; and
• Include an annual monitoring, reporting and review process, supported by a Travel Survey to determine if mode share targets and other actions of the Travel Plan are being achieved.
The applicant shall submit a copy of the final Travel Plan including Travel Access Guide to the Coordinator General, Transport Coordination within TfNSW for endorsement; and provide the builder's direct contact number to small businesses adjoining or impacted by the construction work.	

Road Network Considerations	
Comment	A detailed Traffic and Parking response prepared by TTPA accompanies this report which provides a

Issue	Response
Based on insufficient analysis and supporting documentation provided in the TIA, TfNSW does not currently support the proposed vehicular access at the roundabout on road safety and efficiency grounds. There is concern that with the additional 4th leg, which is to be used as the access to the car park, that there is potential for queuing to spill back to the nearby traffic signals at Bringelly Road. Recommendation The Response to Submissions needs to demonstrate to the satisfaction of TfNSW that the interaction of vehicles entering the car park (including internal circulation and delay within the carpark) and other vehicles using the roundabout does not affect the operation of the traffic signals at Bringelly Road.	comprehensive response to this issue. In summary, the proposal will generate less traffic from this site than was anticipated by the approved Concept Plan, provides vehicular access in a manner anticipated by the Concept Plan, and accordingly the proposal results in a reduced impact to the local road network than was anticipated by the approved Concept Plan. Notwithstanding, in regard to the expressed concern in regard to any queuing back from the Bringelly Road intersection, the location of the principal site access will not have any different impact whether it is a 4th arm or located away from the roundabout. As it is, there will be a second ingress/egress for the car park located to the west of the roundabout which will have significant use and will act to "balance" the movements at the roundabout. The access road connecting between the Bringelly Road intersection and the roundabout will comprise an approach of 2 x 100m lanes plus a 50m left turn lane as indicated on the "Site Plan" provided in Appendix A of the Traffic Report. Due to the geometrical nature and location of the "4th arm" access (in relation to the carpark layout), it is assessed that the ingressing/egressing Bunnings vehicle movements will be split approximately 50/50 with the proposed western access driveway. Due to the unimpeded length of the principal ingress ramp there will be no queuing impact on the roundabout
Comment The trip generation rates within the submitted TIA was determined from a trend line extracted from a traffic survey result. From the surveys TfNSW (formerly RTA) did in 2009, the reduction in site peak hour trip generation with increasing size of development for hardware store land use is evident in weekday data but not evident in weekend data. However the traffic generation trend lines included in the TIA provide the opposite result for the development's weekend data. Recommendation Provide detailed analysis for the submitted trip generation survey for review	A detailed Traffic and Parking response prepared by TTPA accompanies this report which provides a comprehensive response to this issue. In summary in relation to rates the TTPA trend lines vs RTA study, it is noted that: • 5 of the 9 RTA sites were only Mitre10 outlets with an average floor area of only 2,000m2 • the 4 Bunnings sites only average 10,000m2 • 3 of the 4 Bunnings sites are included in the TTPA trend lines • it is widely recognised and accepted that the RTA findings are not representative of contemporary Bunnings developments • the TTPA trend line data has been accepted by RMS and the L&E Court for many recent consents for Bunnings developments.

Issue	Response
Comment The TIA uses 20% - 27% passing trade discount for the trip generation calculations. Discount for passing trade / diverted link trips only comes from traffic already on Bringelly Road. The traffic entering / leaving the site could apply a relatively smaller discount for any multipurpose trips in the broader precinct. However, there is no data provided to support these claims. Recommendation Provide detailed information and data for passing trade discount for review	A detailed Traffic and Parking response prepared by TTPA accompanies this report which provides a comprehensive response to this issue. The adopted Passing Trade characteristic is provided in the extract from the ARRB publication reproduced in Appendix C of the Traffic Report. In regard to the comment that "passing trade only comes from traffic already on Bringelly Road", this is not correct, it will come from the future traffic flows along Bringelly Road.
Comment The proponent is advised that there are no commitments by TfNSW to upgrade Bringelly Road to 6 lanes by 2031 and cannot be relied on in the submitted TIA. Recommendation The TIA should be updated to reflect this.	A detailed Traffic and Parking response prepared by TTPA accompanies this report which provides a comprehensive response to this issue. The traffic assessment does not "rely" on the envisaged widening of Bringelly Road to 6 lanes and attention is drawn to the extract P16 in Appendix B for the analysis (requested by RTA) of 4 lanes plus 1 right turn lane. The comments in relation the planning for 6 lanes on Bringelly Road simply relate to the circumstances and assessment undertaken for the Concept Plan. The fact is that with the subsequent planning for road network (particularly that associated with the new airport with the Elizabeth Drive upgrade and M12 construction) the previously foreseen future traffic growth on Bringelly Road (i.e. Aecom Study for the then RTA) will now be "tempered" as a result of the new plans for the future road network.
Comment The proponent has not adequately assessed the design of vehicular (both HV and LV) access, circulation, parking module, loading and unloading facilities, pedestrian and cyclist facilities. It is not clear whether simultaneous entry/exit movements can be accommodated for the largest vehicle. Recommendation Provide detailed information in the TIA and swept paths for review.	A detailed Traffic and Parking response prepared by TTPA accompanies this report which provides a comprehensive response to this issue. In relation to this issue, the following is noted: • The turning path assessment diagram provided in Appendix D of the traffic report quite clearly shows the satisfactory provision for semi-trailers to access, unload and circulate and it can be seen quite clearly that cars will be able to egress the western driveway as trucks enter. • Dimensional details are provided on the development plans confirming that the design of the carpark complies with (in fact exceeds) the requirements of AS2890.1 and 6.

Issue	Response
	• Given the nature of the development use, pedestrian and cyclist visitation will be very largely limited to worker movements. A footway will be provided along the site frontage with a ramp connection through to the building entrance. There will be 12 bicycle spaces provided and workers will have locker and shower provisions. It is noted that it is proposed to incorporate Consent Conditions in relation to these issues.
Advisory Comments	
Detailed design plans and hydraulic calculations of any changes to the stormwater drainage system on Bringelly Road are to be submitted to TfNSW for approval, prior to the commencement of any works. Please send all documentation to development.sydney@rms.nsw.gov.au. A plan checking fee will be payable and a performance bond may be required before TfNSW approval is issued.	N/A. There is no change proposed to Bringelly Road stormwater drainage system.
A Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to the Consent Authority for approval prior to the issue of a Construction Certificate.	Noted and agreed.
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 2890.2-2018 for heavy vehicle usage.	Noted and compliance is achieved.
The swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS. In this regard, a plan shall be submitted to the Consent Authority for approval, which shows that the proposed development complies with this requirement.	Noted and compliance is achieved.

4.3 Planning, Industry and Environment – Climate Change and Sustainability

The Climate Change and Sustainability division of Planning, Industry and Environment provided a submission in relation to the subject development application in correspondence dated 3 December 2019. A summary of the issues raised and a response is provided below:

Issue	Response
Aboriginal Cultural Heritage	
If the Department determines to grant approval, EES recommends that any conditions recommended by the Aboriginal Archaeological Assessment prepared byAHM dated 20 October 2015 be included as conditions of consent.	No objection is raised in relation to the imposition of this conditions which are accepted by Bunnings.
Biodiversity	
The exhibited documents did not include a biodiversity development assessment report (BDAR) as required by section 7.9 of the Biodiversity Conservation Act 2016. While the EIS states that the complete clearing of the subject site of all vegetation was approved for as part of the stage 1 works for the Business Hub, EES understands that regardless an SSD must be accompanied by a BDAR unless a waiver has been granted as per section 7.9.	A BDAR waiver report accompanies this submission.
Flooding	
EES have reviewed the following documents: • Civil Engineering Report for the Development Application (SSD10366) prepared by Costin Roe Consulting Rev C dated 4 November 2019 • Appendix E of EIS (prepared by Costin Roe Consulting, dated November 2019 • Assessment made for SSD951 1 on 22 August 2018. The analysis and design undertaken for the proposed development site, which are documented in the Civil Engineering Report, are considered adequate to address and manage the flooding and drainage issues in accordance with the requirements from the Floodplain Development Manual (2005) and Liverpool City Council.	Noted.
Landscaping	
The Landscape Plan proposes to use species that are not native to the area. This is despite the Notice of Determination for the Concept plan requiring	The landscape plan has been amended to use native plants indigenous to the area.

Issue	Response
(Conditions B4 and B5) that native plants and species indigenous to the area be used. EES recommends that the landscape plan be amended to use native plants indigenous to the area.	

4.4 Planning, Industry and Environment – Industry Assessments

The Industry Assessments division of Planning, Industry and Environment provided a submission in relation to the subject development application in correspondence dated 10 December 2019. A summary of the issues raised and a response is provided below:

Issue	Response
Requirement for Preliminary Hazard Analysis (PHA)	
EIS Appendix I includes a preliminary risk screening performed in accordance with the Department's Applying SEPP 33, as required under the SEAR. The screening indicated that the quantities of dangerous goods stored within the SSD and transported to and from the SSD are below the thresholds in Applying SEPP 33. As such, the SSD is not potentially hazardous under SEPP 33 and a PHA does not need to be submitted. Notwithstanding, we recommend the following conditions to be included in the consent if he SSD is approved: 1. The Applicant must ensure that the dangerous goods quantities at any time within thedevelopment and transported to and from the development will not exceed thescreening threshold quantities listed in the Department's Hazardous and OffensiveDevelopment Guidelines, Applying SEPP 33. 2. The Applicant must store and handle all chemicals, fuels and oils within the development in accordance with: (a) the requirements under all relevant Australian Standards; and (b) the NSW EPA's Storing and Handling of Liquids: Environmental Protection –Participants Handbook if the chemicals, fuels and oils are liquids. In the event of an inconsistency between the requirements listed from (a) and (b) above,the most stringent requirement shall prevail to the extent of the inconsistency.	No objection is raised in relation to the imposition of this conditions which are accepted by Bunnings

Issue	Response
Consultation with Jemena	
The Applicant has not directly consulted with Jemena on their pipelines. As such, this SEAR has not been met. Attached is the Jemena pipeline which is only about 20 m from the SSD boundary. In noting that the application has been referred to Jemena for their comment and the Applicant has been requested to directly consult with Jemena, we will provide further advice after reviewing the relevant information to be provided.	Consultation has now occurred with Jemena. A Jemena Pipeline Risk Mitigation letter prepared by Systra accompanies this report which identifies that whilst the proposed Bunnings development falls with the measured length of the Primary pipelines (766m for the Eastern Gas and Central Trunk pipelines) and 300m for the Sydney Primary pipeline, the proposal has no impact on and poses no threat to the pipelines. Accordingly, rather than preparing a Safety Management Study (SMS), it is proposed that Bunnings address the potential gas release or fire risk that could result from a pipeline incident in its Site Emergency Plan. A condition of consent can be imposed to reflect this requirement.

4.5 Jemena

Jemena provided a submission in relation to the subject development application in correspondence dated 17 December 2019. A summary of the issues raised and a response is provided below:

Issue	Response
Jemena recommends that a Safety Management Study (SMS) be conducted into the additional threats the development may infer on the pipelines and main. This study will identify additional physical controls that must be implemented to reduce the risk to the community in the event of a pipeline rupture.	A Jemena Pipeline Risk Mitigation letter prepared by Systra accompanies this report which identifies that whilst the proposed Bunnings development falls with the measured length of the Primary pipelines (766m for the Eastern Gas and Central Trunk pipelines) and 300m for the Sydney Primary pipeline, the proposal has no impact on and poses no threat to the pipelines. Accordingly, rather than preparing a Safety Management Study (SMS), it is proposed that Bunnings address the potential gas release or fire risk that could result from a pipeline incident in its Site Emergency Plan. A condition of consent can be imposed to reflect this requirement.

4.6 NSW Rural Fire Service

NSW Rural Fire Service provided a submission in relation to the subject development application in correspondence dated 28 November 2019 which did not raise any further concerns with the proposal and includes five suggested conditions of consent. No objection is raised in relation to the imposition of these conditions which are accepted by Bunnings.

4.7 NSW EPA

NSW EPA provided a submission in relation to the subject development application in correspondence dated 20 November 2019 which confirmed that the proposal does not constitute a Scheduled Activity under Schedule 1 of the Protection of the Environment Operations Act 1997 (the POEO Act) and does not require an Environment Protection Licence (EPL) under the POEO Act. Accordingly, the EPA has no further comment regarding the proposal and has no further interest in this matter.

5.0 PUBLIC SUBMISSION

Only one public submission was received during the exhibition of the development application. A summary of the submission and a response is provided below:

Issue	Response
The applicant should be required to consult with a solar engineer and include solar installation to the maximum capacity practicable prior to the development receiving an occupation certificate (likely to be approximately IMW of solar).	There is no statutory basis for the imposition of this suggested requirement. Nonetheless, it is also noted that Bunnings represents a basic and low energy use retail environment due to their commitment to achieving a high level of sustainability measures within their warehouses in order to reduce energy consumption and greenhouse gas emissions, with the following attributes and measures designed to maximise energy efficiency: • Store construction comprises high thermal mass components such as on-ground concrete slab flooring and concrete wall panels. • Minimisation of external glazing to limit solar heat gain to the internal space. • Use of passive ventilation in new warehouses for customer comfort as opposed to reliance on air conditioning. • High floor to roof heights which allow temperature differentials between underside of roof and human occupied space. • Use of insulated roofing to limit heat gain and heat loss to the environment and use of translucent roof sheeting to allow natural lighting within the warehouse. • Installation of energy efficient e-tronic lighting technology in new stores. • Localised radiant gas heaters, which are energy efficient, used for winter heating.

6.0 CONCLUSION

This report and the accompanying documentation provides a detailed response to the issues raised by all parties in relation to the proposed development application. As a result of consideration of the issues and concerns which were raised in the submissions, the proposed development has been amended to achieve an improved landscape design outcome.

This Response to Submissions and the accompanying documentation has demonstrated that the amended development application has resolved the issues of concern provided by the Department of Planning, Industry and Environment and has responded to the issues raised by the other government agencies and the public.

The amended proposal represents an improved design response to the context of the site and subject to the implementation of the previously identified mitigation measures, the amended proposal will not result in any unreasonable impacts on adjoining properties, the locality or the environment. The amended proposal is consistent with the aims and objectives of the State Environmental Planning Policy (Western Sydney Parklands) 2009 (WSP SEPP) as well as the relevant key development standards and the specific objectives and design principles of the approved Concept Plan (SSD 6342) which applies to the site. Finally, the amended proposal will assist in fulfilling the vision for the Bringelly Road Business Hub and will contribute towards the revenue base that will fund infrastructure, maintenance and improvements in the Parklands.

This Response to Submissions and the accompanying documentation has demonstrated that the amended proposal is capable of support and appropriate for approval.

APPENDIX A

John Lock & Associates

AMENDED LANDSCAPE PLAN A

APPENDIX B

TTPA

TRAFFIC AND PARKING RESPONSE B

APPENDIX C

Sclerophyll

BDAR WAIVER REPORT C

APPENDIX D

Systra

JEMENA PIPELINE RISK MITIGATION LETTER D