



Your ref: SSD 10457  
File no MC-20-00003

Department of Planning Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

20 May 2020

Recipient Delivery [emily.dickson@planning.nsw.gov.au](mailto:emily.dickson@planning.nsw.gov.au)

**Attention: Emily Dickson**

Dear Ms Dickson

**SSD 10457- Eastern Creek Retail Outlet- Stage 3**

Thank you for your correspondence dated 4 May 2020 inviting us to provide input to the Secretary's environmental assessment requirements (SEARS) for Eastern Creek Retail Outlet- Stage 3, which is State Significant Development under the *Environmental Planning and Assessment Act 1979*.

The request for SEARs, concept plan and the draft SEARS has been reviewed by our officers and we have identified a range of additional critical issues that the applicant must address in the EIS and these are listed in **Attachment A** to this letter. We request that these matters are included in the final SEARs issued to the applicant to ensure that these are addressed in the final EIS prepared for this proposal.

If you would like to discuss this matter further, please contact our Senior Development Planner, Kelly Coyne, on 9839 6000.

Yours faithfully

Judith Portelli  
Manager Development Assessment

**Connect - Create - Celebrate**

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All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

## ATTACHMENT A

Matters to be included in SEARs and addressed:-

### Planning comments

- i. The SEARS request from Ethos Urban has been reviewed and make the following comments:

Page 6 refers to BCC's draft LSPS. The LSPS has now been adopted (March 2020) Please amend this where ever this appears in the documentation.

- ii. Page 10 refers to a meeting with Council on 31 July 2019 which said Frasers received positive feedback that an outlet centre would not impact existing retail centres and will attract investment from outside the LGA. The draft SEARS requires an economic impact assessment that addresses the economic impacts the proposed land uses will have on the surrounding area including the viability of nearby commercial areas within the trade catchment of the site and the impact of converting specialised retail floor area to retail factory outlet floor area. Further, the economic assessment is required to clearly identify the catchment area.

**Planning Comment:** given that this is not just a proposed outlet centre but includes food outlets and entertainment the economic assessment needs to address all facets of the application for example, the impact of a "direct factory outlet " per se might be minimal on existing centres due to the nature of the use including configuration and floorspace requirements however the impact on centres in regards to associated uses such as food outlets and restaurants may be significant so should be addressed separately.

In identifying the trade catchment, it is considered that the focus particularly in regard to "ancillary development" should be on the primary catchment which includes the Rooty Hill and Mount Druitt centres as well as the smaller nearby centre of Evans Road. Depending on the type of these associated uses there could be a significant impact in these centres as customers are attracted away from existing facilities and services.

Additionally, the economic assessment should be factored into the social assessment. Certainly, overall employment opportunities in the area are likely to be increased however if the trade of nearby centres is impacted negatively then there may be a resultant negative social impact on the local community.

- iii. The submission of a Crime Prevention through Environmental Design (CPTD) report prepared by a suitably qualified security consultant. This should be prepared in consultation with the Mt Druitt Local Area Police Command
- iv. Submission of a detailed Waste Management Plan for the construction and the proposed use on the site.

### **Traffic Issues**

The following additional matters need to be addressed in the Traffic and Transport Assessment for the proposal:

1. The suitability of Church Street for heavy vehicle access, an assessment of the proposed carriageway configuration, and any upgrades required to mitigate the impact of the additional traffic generated from the proposal.
2. The current configuration and control of the intersection of Church Street with Rooty Hill Road South and upgrade requirement to this intersection in terms of its control and all directional movements for both passenger and heavy vehicles.
3. In particular traffic impacts on Rooty Hill Rd South at the intersections of Church Street and Beggs Road need to be adequately addressed. Church street especially since further development to the west may also need to be accommodated in the intersection treatment.

### **S7.11 Issues**

The project site and the alternative sites are not subject to any Blacktown City Council contributions plan or Voluntary Planning Agreement. As such, the proponent will be required to ensure that all impacts for infrastructure (water and traffic) are dealt with by the developer on-site.

Applicant needs to be aware that any off-site traffic control devices/measures arising from the traffic and transport assessment of Council's assessment of the EIS must be undertaken by the applicant as part of their development, prior to commencement of any occupation of the approved development.

### **Open Space Issues**

Arboricultural Impact Assessment report is required to be included in the reports to be prepared by the applicant to see if any of the trees located in the 20-metre landscaped buffer can be retained.

### **Engineering Issues**

The proposed development is required to address all the requirements in accordance with Engineering Guide for Development – 2005 including the following:

1. Upgrade of Church Street;
2. Stormwater Easement requirements etc;
3. OSD requirements for the site;
4. On-lot water quality treatment (WSUD) for the site: and
5. Water conservation requirement for Business/commercial development.



### **Drainage Issues**

1. The site is required to discharge through a gross pollutant trap or traps treating gross pollutants and hydrocarbons. The approved drainage plans under the Concept plan approval nominated CDS units or similar to give a particular removal rate of pollutants to protect the bioretention basin under construction. The drainage strategy for this proposal must address this obligation.
2. The development site is also to achieve a minimum 80% reuse of non-potable water on site for all landscape watering, toilet flushing and car wash use (if used) assessed using MUSIC.
3. Design the internal pit and pipe drainage system for a minimum 5% AEP standard.
4. The flood drainage strategy for the proposal is to clearly demonstrate that the 1% AEP 1 in 100 year flood flows from the development site can reach the detention basins under construction through either piped and/or surface flows.