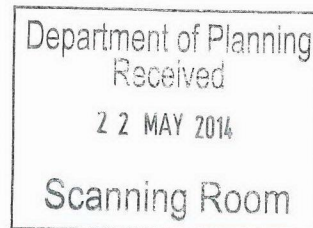


PCU53369

File No: MC-12-1769

20 May 2014

Department of Planning and Environment
Major Projects Assessment
GPO Box 39
SYDNEY NSW 2001



Attention: Thomas Mithen

Dear Mr Mithen,

Proposed Eastern Creek Business Hub (ECBH) SSO 5175-2012 Rooty Hill Road South, Rooty Hill

Reference is made to your letter dated 17 April 2014 inviting us to comment on the Western Sydney Parklands Trust (WSPT) response to submissions received during the public exhibition of the abovementioned proposal.

Thank you granting us an extension of time in which to make our submission.

Council considered a report and received a presentation on this matter by Suellen Fitzgerald from the WSPT on 16 April 2014. At its Ordinary Meeting on 30 April 2014 Council then resolved the following:

- "1. Council receive and note the contents of this report and Ms Suellen Fitzgerald and Mr Eric Brodie of the Western Sydney Parklands Trust be thanked for their presentation to the Policy and Strategy Committee.*
- 2. That Council continue its opposition to the proposal because of impact on local trading centres as a consequence of the transfer of retail sale income from existing centres to a new centre that sits outside the established retail hierarchy and the Sydney Metropolitan Strategy.*
- 3. That Council write to the Minister for Planning and the Western Sydney Parklands Trust informing them of Council's position, and reminding the Minister of the State Government's commitment prior to the 2011 elections, in respect of not eroding any further open space.*
- 4. The General Manager be given delegated authority to forward Council's submission to the Department of Planning and Infrastructure before it comes back to Council.*
- 5. Council seek support for its position from all local State Members of Parliament."*

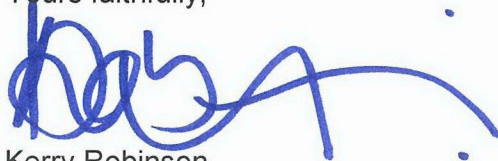
Our detailed response is included as Attachment 1 to this letter. This issues identified in Attachment 1 should be read in conjunction with our original submission dated 29 October 2012.

We are disappointed that the documentation provided for review still does not acknowledge that the ECBH proposal will have a significant detrimental economic impact on existing centres in Blacktown. The documentation narrowly focuses on justifying "bulky goods" and "large format retailing" at the expense of limited consideration of the impacts from the "convenience retailing" component of the proposal.

Therefore we continue our strong opposition to this proposal. We strongly urge that the Minister not support the proposal.

Should you require clarification on any matters raised in this submission please contact Chris Shannon, Manager Strategic and Precinct Planning, on 9839 6229.

Yours faithfully,



Kerry Robinson
General Manager

Blacktown City Council reply to the
Eastern Creek Business Hub (ECBH) proposal
Response to Submissions

1. Unacceptable impact on existing local centres

- a. The main argument put forward by the WSPT is that there are no sites within or adjacent to existing centres that are capable of accommodating the proposed retail and business floorspace. Consequently, the WSPT argue that the proposal is responding to unmet demand and that the trading impacts on existing centres would not jeopardise their viability.
- b. We recognise the population growth projections for our City and the retail expenditure demand this generates. Our response in planning for our City is to concentrate growth in defined Urban Renewal Precincts (URP) around key centres and public transport nodes. This concept is supported by the Metropolitan Plan for Sydney 2036.
- c. The identified URPs are Blacktown City Centre, Mount Druitt Major Centre, Rooty Hill Town Centre, and Seven Hills Town Centre. These URPs have been planned to ensure there is sufficient capacity for employment and housing growth, combined with social and community services, and improvements to the public domain.
- d. A "Sequential Test Site Criteria" was used by Hill PDA in their Supplementary Report to determine if a site is "*available, suitable and commercially and financially viable*". The Report states that "*a site must achieve all of the listed criteria*" to be viable.
- e. The Report's findings that existing centres are not viable are fundamentally flawed. It finds that there isn't suitable vacant land in single ownership in existing centres to develop 34 hectares of 52,800sqm of "bulky goods", "large format retail" and "convenience retail" floorspace.
- f. The argument is flawed as only a greenfield site could possibly satisfy this criteria. If this thinking is applied on a metropolitan scale, then there would be very little or no sites anywhere in Sydney to satisfy demand for retail growth.
- g. It is completely unacceptable and unjustifiable to redirect retail expenditure away from existing planned centres to create new unplanned centres simply because the WSPT don't own sufficient land in those centres. Even on Hill PDA's criteria, the ECBH site would also be unviable as it doesn't have "*available infrastructure, public transport and services*" and the "*surrounding land uses are [in]compatible*". Yet the WSPT ignore the application of their own criteria to their site.
- h. The proposal completely disregards the potential for existing retail premises to be expanded, for sites to be redeveloped, or for sites to be consolidated to enable redevelopment to occur. The simple fact is that the WSPT have absolutely no intention of developing in existing centres as their business model is based on developing their own land to generate income to reinvest in the parklands. Based on our planning strategies, it is our view that there is sufficient capacity in the planned centres to accommodate the "convenience retailing" component of the proposal.

- i. Further, it is illogical to even consider the capacity of Mount Druitt, Rooty Hill and the northern precinct of the Blacktown CBD to accommodate “bulky goods” and “large format retail” floorspace. These centres are not conducive to this form of development, nor is the planning based on accommodating them. The WSPT simply fails to understand the role and function of these key centres in Blacktown.
- j. The proposal also fails to give adequate consideration to the importance of the large developing bulky goods precinct in Marsden Park that will capture the growth in demand from population expansion in the North West Growth Centre. The proposal cannot rely on this same population growth to justify their “bulky goods” and “large format retail” proposal. Additionally, as a concept, the level of detail relating to the “large format retail” component is vague and pre-emptive.
- k. The justification for the “convenience retailing” being needed to support the “bulky goods” retail is disputed. Successful bulky goods estates across Sydney do not have an equivalent “convenience retail” component that supports their viability. This is evident in areas such as Moore Park Supa Centre, Belrose Supa Centre and Victoria Avenue, Castle Hill.

Conditions on any approval for “large format retailing”

- l. We are currently considering a Planning Proposal to enable a Costco Warehouse to be developed on land in Marsden Park. If the Department were to approve the ECBH proposal, we would ask that the proposed development standards that will apply to Costco be conditioned on any approval of the “large format retail” component. The requested condition is outlined below:
 - “The “large format retail” component must:*
 - 1. occupy a minimum gross floor area of 14,000sqm; and*
 - 2. be operated by one retailer and/or tenant only.”*
- m. In the absence of such a condition, the “large format retail” component could operate as “general” retailing, which when combined with the “convenience retail” component, would total 23,500 sqm of retail floorspace. This is larger than Plumpton Marketplace and equivalent in size to Westfields Mount Druitt. This is completely unacceptable.