

## Blacktown City Council

**Table 1. Response to Submission from Blacktown City Council**

Key Issues	Response	Response prepared by
<p>Issues in Council's letter of 14 March 2012 largely ignored. The main issues raised in Council's letter relevant to the EIS were:</p> <p>Appropriateness of the scale of the proposed development;</p> <p>Concern regarding the impact on commercial viability on existing centres.</p>	<p><b><u>Commercial viability of existing centres:</u></b></p> <p>Hill PDA's Economic Impact Assessment (EIA) (August 2012) followed previous economic and land use demand advice to WSPT by MacroPlanDimasi (MPD) in March 2012. The MPD report assessed the potential for a convenience/neighbourhood centre and bulky goods development on the subject site. The outcomes of the MPD report informed the land use options examined by Architectus during the development of the site's Concept Plan. The MPD report has been submitted to DoPI with this response to submissions document.</p> <p>Hill PDA's Economic Impact Assessment (EIA) submitted with the EIS addressed concerns regarding the impact the proposal will have on surrounding centres. This has been further explained through the Hill PDA Supplementary Report (December 2013) by way of additional detail on the expenditure captured by the proposal in relation to expenditure available in its trade areas, explanation of the impact this would have on other centres, and further explanation of the impact of the proposal through the use of the Hill PDA gravity model.</p> <p>In summary, the trading impact of the proposed development on all existing centres even under the higher impact scenario modelled in the EIA impacts on all existing centres would be less than 10% which is generally considered within the competitive range. In particular we note the following with regard to impact on individual centres in 2016 under the high impact scenario:</p> <ul style="list-style-type: none"> <li>• <b>Rooty Hill</b> – would experience an insignificant decline in trade (less than 1%) at the point of the proposed development's opening in 2016 as a result of the proposed development. The Blacktown Commercial Centres Study<sup>1</sup> found that Rooty Hill North, which accommodates the majority of floorspace in this Centre, is trading at 23% above the benchmark level for equivalent centres. This means that the Centre is trading strongly and would therefore be able to absorb such an insignificant impact;</li> <li>• <b>Myrtle Street, Prospect</b> – it is projected that this Centre would experience a 4.4% loss of trade following the proposed development. It is anchored by a full-line Woolworths supermarket which accounts for the vast majority of total floorspace provided in this centre. It is expected to be able to accommodate this level of impact without its role or function being jeopardised;</li> <li>• <b>Holbeche Road, Arndell Park</b> – it is estimated that this Centre would experience an insignificant loss of trade in 2016 (\$0.3m or 1.3%) following the proposed development. The Blacktown Commercial Centres Study indicates that this Centre is trading above average levels (i.e. a retail turnover density of 121%)<sup>2</sup> allowing it to sustain the impact forecast;</li> <li>• <b>Rainbow Shopping Centre</b> – it is estimated that this Centre would experience a decline in trade of 7% as of 2016. The Blacktown Commercial Centres Strategy states that the trading level of this Centre shows a 'good performance' as a result of low vacancies, the presence of a 'buoyant' retail anchor and a high retail turnover density<sup>3</sup>. On this basis it is believed to be trading well and therefore able to absorb the estimated impact; and</li> <li>• <b>Homebase Prospect</b> – this is an out-of-centre bulky goods cluster. Any adverse impact on this location may therefore be considered a matter of competition only and not an impact to a centre within the retail hierarchy as defined by Government Policy.</li> <li>• <b>Blacktown CBD</b> – it is forecast that even with the opening of the proposed development in 2016, the level of trade would increase in this Centre by at least 4%. Furthermore industry sources identify Westpoint Blacktown as the 43rd highest grossing shopping centre in Australia as of 2013<sup>4</sup>.</li> </ul>	Hill PDA

<sup>1</sup> Source: Page 79 Blacktown Commercial Centres Study, SGS (2007)

<sup>2</sup> Source: Page 79-80, Blacktown Commercial Centres Study, SGS (2007)

<sup>3</sup> Source: Page 89, Blacktown Commercial Centres Study, SGS (2007)

<sup>4</sup> Source: Big Guns, Shopping Centre News (2013)

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	<p>• <b>Mt Druitt</b> – in keeping with Blacktown CBD, it is forecast that this Centre would experience a growth in trade as of 2016 even with the opening of the proposed development. Westfield Mt Druitt is also trading at above average levels for a centre of its size and is performing at 10% above the median<sup>5</sup>.</p> <p>It is also important to reiterate that these impacts are at the point of opening in 2016 and that any potential adverse impacts would be further ameliorated each year as the population continues to grow in the relevant trade areas.</p> <p><b><u>Appropriateness of scale of development:</u></b></p> <p><b><u>Hill PDA Response:</u></b> As demonstrated in the retail demand estimates which are agreed upon by all parties (Hill PDA, MPD, SGS) there is sufficient demand for the proposed bulky goods floorspace in this location. The scale of floorspace proposed is a response to consumer demand and is appropriate in this context.</p> <p><b><u>Architectus Response:</u></b> Bulky goods premises, by their very nature, are bulky. Nevertheless, Design Guidelines have been produced for the proposed development by Architectus to promote high quality design and to control the bulk and scale and built form outcomes on the site and relationship to context. These are at <b>Appendix 11</b>. The Guidelines include site-specific development controls for each superlot,</p> <ul style="list-style-type: none"> <li>• One of the key elements in the Guidelines for intended built form is for buildings to have an appropriate scale for an employment area. One of the objectives for built form includes “Ensure that built form responds to the existing streetscape of Rooty Hill Road South”. Another of the controls for built form specifies “All development applications are to be prepared by a registered architect.”</li> <li>• It contains an objective for building envelope controls: “Ensure that building forms are consistent with the desired precinct character and are of an appropriate scale for an employment area.”</li> <li>• An objective for the site coverage control specifies “To ensure new development responds appropriately to the size, scale, configuration and existing natural features of each individual developable lot.”</li> <li>• The Guidelines specify “predominantly single level built form with maximum heights between 8m and 12m and floorplates up to 14,000sqm”.</li> </ul>	<p>Hill PDA</p> <p>Architectus</p>
<p>EIS fails to address key matters in DGR's.</p> <p>The main issues raised in the DGR's relevant to the EIS were:</p> <p>Consideration of the economic impact on existing commercial areas including Evans Road, Rooty Hill, Doonside Arndell Park, Plumpton, Homebase Prospect and Hometown Minchinbury;</p> <p>Need to define a catchment area.</p>	<p>See response above.</p> <p>Chapter 7 of the EIA addressed the redirection of trade from Evans Road, Rooty Hill, Doonside Arndell Park, Plumpton, Homebase Prospect and Hometown Minchinbury to the subject site as a result of the proposal.</p> <p>A 'catchment area' (i.e. trade area) for the convenience centre and bulky goods components were identified in Figures 5 and 6 respectively of the EIA and have been provided again together with commentary and further explanation in Hill PDA's Supplementary Report. The extent of the trade area was confirmed as reasonable by the SGS peer review.</p>	Hill PDA
<p>Recommends Minister not support proposal in current form until matters are addressed.</p>	<p>The matters have been addressed in Hill PDA's EIA, Hill PDA's Supplementary Report, the EIS, and the Response to Submissions report.</p>	Hill PDA / Architectus
<p><b>Failure to properly consider existing planning policies</b></p>		
<p>a. NSW draft Centres Policy (2009):</p> <p>Proposal inconsistent with principles of draft centres policy:</p>	<p><b><u>Hill PDA Response:</u></b> Chapter 8 of the EIA indicates the proposal is consistent with the NSW Draft Centres Policy:</p> <p><i>By providing new retail floorspace and new types of retailers it would support competition in this locality; and</i></p> <p><i>The retail impact of the proposed development is not likely to prejudice the commercial viability of existing centres in the surrounding area. Beyond this, it is not the role of the planning system to consider the trading impacts on individual retailers.</i></p> <p>Table 26 of the Supplementary Report also indicates:</p> <p><i>In line with the Draft Centres Policy, the proposal would:</i></p> <ul style="list-style-type: none"> <li>• <i>Cluster retail premises and bulky goods premises in one location and</i></li> </ul>	Hill PDA

<sup>5</sup> ibid

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	<p>would constitute a flexible approach by allowing new centres to form;</p> <ul style="list-style-type: none"> <li>• Leave it to the market to determine what are the most appropriate retail uses on the site;</li> <li>• Provide a mix of retail types including large format retail which responds to forecast demand; and</li> <li>• Encourage competition in the retail and bulky goods retail sectors by allowing new retail facilities and potentially new retailers not currently represented to enter Blacktown LGA.</li> </ul> <p>We also note that the NSW Draft Centres Policy is in draft form and therefore whilst it is still necessary to consider this Policy its recommendations are not mandated.</p> <p><u>Architectus Response:</u></p> <p>The Response to Submissions report addresses the Draft Centres Policy, and assesses the development against the planning principles in the Centres Policy.</p>	Architectus
Principle 1 – important role of existing centres not acknowledged.	<p><u>Architectus Response:</u></p> <p>Refer to the assessment of the development against the principles of the Draft Centres Policy in <b>Section 3.1.7</b> in the Response to Submissions report. This finds that the development satisfies this principle.</p> <p><u>Hill PDA Response:</u></p> <p>Chapter 4 of the EIA undertakes an analysis of existing centres and retail facilities around the Subject Site in recognition of the importance of the existing hierarchy as nominated in DoPI's Draft North West Subregional Strategy.</p> <p>The MPD report also considered the retail hierarchy surrounding the subject site in assessing the need and demand for retail uses on the subject site.</p>	Architectus  Hill PDA
Principle 2 – redirection of trade expenditure from existing centres considered unacceptable and inconsistent with draft Centre's policy.	<p><u>Architectus Response:</u></p> <p>Refer to the assessment of the development against the principles of the Draft Centres Policy in <b>Section 3.1.7</b> in the Response to Submissions report. This finds that the development satisfies this principle.</p> <p><u>Hill PDA Response:</u></p> <p>Any new retail development (whether within an existing centre or as part of a new centre) will divert trade from other centres. Indeed in a market economy, the public interest is served by competitors impacting upon each other as impacts help to keep prices low, service standards high and efficiency in the distribution of land, labour, financial and other resources. Furthermore businesses impacting upon each other can provide strong economic incentives for improvements in the range and quality of goods and services provided to communities<sup>6</sup>.</p> <p>Notwithstanding this, the EIA and Supplementary Report indicates the trading impacts are within the normal competitive range as explored previously in this response to submissions.</p> <p>The sales turnover associated with the proposal represents only a very small proportion of overall expenditure available within the trade areas. Well over 80% of expenditure within both the convenience retail centre and bulky goods trade areas will remain available to other centres.</p> <p>Principle 2 also advocates flexibility which includes allowing new centres to form.</p>	Architectus  Hill PDA
Principle 3 – proposal inconsistent with Council's existing retail hierarchy. It is an income generator for the Trust and will not serve local communities.	<p><b><u>Proposal inconsistent with Council's existing retail hierarchy:</u></b></p> <p><u>Architectus Response:</u></p> <p>Refer to the assessment of the development against the principles of the Draft Centres Policy in <b>Section 3.1.7</b> in the Response to Submissions report. This finds that the development satisfies this principle.</p> <p><u>Hill PDA Response:</u></p> <p>Both the NSW Draft Centres Policy and the Metropolitan Plan for Sydney</p>	Architectus  Hill PDA

<sup>6</sup> Source: Performance Benchmarking of Australian Business Regulation: Planning, Zoning and Development Assessments, Productivity Commission (2011)

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	<p>2036 indicate hierarchies should be flexible and not rigid to allow existing centres to expand, new centres to develop and new retail formats to be accommodated.</p> <p>The critical consideration from a retail perspective is the trading impact on existing centres which would eventuate from the proposed development and ensuring that it would complement rather than compete with the existing hierarchy. Trading impacts of the proposal on existing centres have been shown to be within the normal competitive range and would therefore not threaten the existing hierarchy.</p> <p>In particular, the proposal will still allow Mt Druitt to grow over time given significant population growth within Mt Druitt's trade area. Mt Druitt is performing. However, the Sequential Test provided in the Supplementary report indicates there are few available, suitable or viable sites for retail development in and on the fringe of surrounding centres including Mt Druitt (as well as Rooty Hill and Minchinbury) to accommodate additional retail development. Those sites that are available are either:</p> <ul style="list-style-type: none"> <li>• <i>Of an insufficient size or would require significant amalgamation with surrounding sites;</i></li> <li>• <i>Are the subject of residential or other development approvals;</i></li> <li>• <i>Are intended for higher order uses within Council master plans and strategies; or</i></li> <li>• <i>Are to prohibit bulky goods under proposed zones within Draft Blacktown LEP 2013.</i></li> </ul> <p><b><u>It is an income generator for the Trust and will not serve local communities:</u></b></p> <p><b><u>Response by Architectus</u></b></p> <p>The purpose of undertaking the development is to raise sufficient revenue to be fed back into the facilities, management and maintenance of the parklands. The parklands is primary open space network that serves Western Sydney, that is public open space for the use of the community. The tangible benefits to the parklands that the revenue from ECBH will generate, are discussed at <b>Section 3.5</b> in the Response to Submissions.</p> <p>Moreover, the proposed development will serve local communities in that it will provide a component of convenience retail and potentially business premises that will serve the local catchment. It will also include a playground, environmental rehabilitation work, and transport improvements to Rooty Hill South Road.</p> <p>The Cost Benefit Analysis which is now included at <b>Appendix 5</b> demonstrates the positive impact the proposal would have on the local and broader communities from a <i>'whole of economy'</i> perspective.</p>	Architectus
<p>b. Draft SEPP (Competition) 2010: EIS relies too heavily on draft SEPP provisions for justification of proposal: Commercial viability and likely impact of development on commercial viability of other development.</p>	<p>Chapter 8 of the EIA notes the proposed development complies with the Draft SEPP:</p> <ul style="list-style-type: none"> <li>• <i>By providing new retail floorspace and new types of retailers it would support competition in this locality; and</i></li> <li>• <i>The retail impact of the proposed development is not likely to prejudice the commercial viability of existing centres in the surrounding area. Beyond this, it is not the role of the planning system to consider the trading impacts on individual retailers.</i></li> </ul> <p>Also see previous comments regarding the impact of the proposal on surrounding centres and recognition of the public benefits associated with trading impacts.</p> <p>We note that, due to the length of time passed since publication of the EIA, the Draft SEPP is no longer a consideration for planning proposals based on guidance in the Consideration of draft EPIs under Section 79C of the EP&amp;A Act (P5 08 – 013, 13th November 2008). This mandates that draft Environmental Planning Instruments which have not been made in 3 years from exhibition should no longer be considered.</p>	Hill PDA
<p>Cites case law (Fabcot) referenced in EIS for justification. Refers that draft Competition SEPP is consistent with this case law but inconsistent with Randall Pty Ltd v Willoughby City Council (2005) 144 LGERA</p>	<p>Due to the length of time passed since publication of the EIA, the Draft SEPP is no longer a consideration for planning proposals based on guidance in the Consideration of draft EPIs under Section 79C of the EP&amp;A Act (P5 08 – 013, 13th November 2008). This mandates that draft Environmental Planning Instruments which have not been made in 3 years from exhibition should no</p>	Hill PDA

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119.	longer be considered.	
<p>c. Local Planning Policies</p> <p>i. Blacktown Commercial Centres Strategy (2007) – The EIS fails to justify how proposal is consistent with the strategy.</p>	<p>Chapter 8 of the EIA and Table 26 of the Supplementary Report addresses the Commercial Centres Strategy. Of particular note, as identified within the Supplementary Report, the Commercial Centres Strategy notes that:</p> <ul style="list-style-type: none"> <li><i>Significant population growth is forecast to sustain centres.</i></li> <li><i>Mt Druitt is a very good performing centre with opportunities for expansion and nominates Mt Druitt as a Major Centre by Council definition but a Town Centre based on DoPI definitions.</i></li> <li><i>Rooty Hill is nominated as a Village Centre with 16,000sqm of convenience retail floor space. The Rooty Hill centre remains larger than the convenience retail component of the proposed Eastern Creek Business Hub.</i></li> <li><i>Given bulky goods was excluded from the Commercial Centres Strategy, the Strategy nominates that a bulky goods retail supply and demand assessment should be undertaken and a strategy for bulky goods retail established. Currently no bulky goods retail clusters outside of centres such as those within the Minchinbury precinct, Prospect Homebase or Blacktown Mega Centre are recognised within the Strategy, although it could be argued that they are operating as centres.</i></li> <li><i>With reference to out-of-centre development, the Strategy advocates providing land in suitable locations well ahead of anticipated demand, an outcome which the proposed development at the Eastern Creek Business Hub is seeking to achieve.</i></li> <li><i>The Strategy indicates that the City has insufficient commercial land to accommodate likely demand and therefore there may be a need to zone additional land for commercial purposes beyond 2014. The proposed development is in response to this identified undersupply of commercial land and is in accordance with the recommendations of the Strategy.</i></li> </ul> <p>It should also be noted that as identified in Table 26 of the Supplementary Report that the proposal is in accordance with the more recent Blacktown Planning Strategy (2012) which recognises:</p> <ul style="list-style-type: none"> <li><i>The City is expected to grow over the next 25 years to a population of 500,000 people. The bulk of this population growth is largely based on the State Government's dwelling targets for the North West Growth Centre and the established areas of the City.</i></li> <li><i>In 2007 the residents of the City generated sufficient demand for over 580,000sqm of retail floor space. By 2036 it is forecast that this demand will increase by approximately 691,000sqm to 1,270,000sqm across the City. The greatest demand for retail floor space will occur in the Supermarkets and Grocery Stores, Bulky Goods Stores and Personal and Household Retailing Sectors.</i></li> <li><i>Strategy 3: Planning for a Growing Population recognises significant growth in the City, and predicts that an additional 33,300 persons will live in the Mt Druitt Precinct by 2036. The majority of the population growth will be housed through an increase in residential densities located around the Mount Druitt Major Centre.</i></li> <li><i>In response to projected growth within the City, Strategy 3 plans for predicted population growth by ensuring there is sufficient zoned and serviced land to meet the increased demand in housing, employment, infrastructure and services, open space and recreation, culture and entertainment, and community services and facilities.</i></li> <li><i>A greater number of jobs in the retail industry should be encouraged for the following reasons: there is a substantial growth in demand for retail services forecast for the City, the industry is the second largest generator of employment (for residents of all 3 City Precincts), 60% of residents employed in this industry are required to leave the City for employment opportunities.</i></li> </ul>	Hill PDA
<p>ii. Blacktown Commercial Centres Study (2012) – there is no such study being prepared by Council.</p>	<p>WSPT was provided with a confidential extract of a commercial centres strategy and Blacktown Planning Strategy 2036 that were being prepared by Council (by Council officer) to Architectus by email on 19/07/2012. It is assumed that the centres strategy is the 2007 retail strategy that was adopted in 2011 by Council.</p>	Hill PDA Architectus

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	<p><u>Response by Architectus</u></p> <p>The Blacktown Commercial Centres Analysis (prepared 2007 and adopted by Council 2011) is addressed at <b>Section 3.1.10</b> of the Response to Submissions report.</p>	Architectus
<p><b>2. Failure to properly consider the impacts on the locality</b></p> <p>a. Proposal is not factored into confidential Masterplans Council has prepared for centres:</p> <p>i. Blacktown City Centre – provides up to 60,000 jobs and 25,000 dwellings on 861 hectares.</p> <p>ii. Mount Druitt Major Centre – provides for employment growth and up to 10,400 dwellings on 334 hectares.</p> <p>iii. Seven Hills Town Centre - provides for employment growth and up to 4,700 dwellings on 122 hectares.</p> <p>iv. Rooty Hill Town Centre - provides for employment growth and up to 6,000 dwellings on 144 hectares.</p>	<p>The Masterplans were not publically exhibited or available at the time of the EIS or EIA.</p> <p>However, Chapter 6 of the Supplementary Report recognises that a range of Master Plans for existing centres such as Mt Druitt and Rooty Hill. It is understood Council's Master Plans have been prepared based on principles such as:</p> <ul style="list-style-type: none"> <li>• <i>Constraints and opportunities of the precinct, including environmental, social and economic factors as well as existing characteristics of the area or neighbourhood;</i></li> <li>• <i>Opportunities for increasing housing and employment;</i></li> <li>• <i>Financial feasibility;</i></li> <li>• <i>Access to appropriate transport and service infrastructure;</i></li> <li>• <i>Infrastructure growth requirements; and</i></li> <li>• <i>Appropriate land uses and proposed zonings, permitted land uses and development controls.</i></li> </ul> <p>New jobs and dwellings within nominated Master Plan centres such as Mt Druitt and Rooty Hill will improve the sustainability of existing centres and will improve their ability to accommodate and absorb impacts as a result of the Eastern Creek Business Hub proposal.</p> <p>Also refer to the findings of the Sequential Test analysis in Chapters 6 and 7 of the Supplementary Report.</p>	Hill PDA
<p>b. Council put in submissions for Blacktown, Mount Druitt Major Centre, Seven Hills and Rooty Hill centres as Urban Activation Precincts.</p>	<p>The proposed development would not prejudice these centres being identified as Urban Activation Precincts.</p> <p>In addition UAPs are required to have characteristics which are considered important in enabling delivery of the NSW Transport Masterplan and increasing the supply of housing and employment lands. The precincts are in locations which could maximise the NSW Government investment in infrastructure through the integration of transport and land use planning. Hence should any centres in Blacktown be considered as a UAP and subsequently be supported through infrastructure improvements (etc) – this would further support the ability of Blacktown to accommodate growth and be a sustainable centre in its own right – regardless of the proposed development.</p>	Hill PDA
<p>c. The EIS does not discuss broader impacts of the proposal on these centres.</p>	<p>The EIA and Supplementary Report indicate most centres will still experience growth in trade between 2011 and 2016 even with the proposed development, and Blacktown, Mount Druitt, Seven Hills and Rooty Hill will all increase their trading levels to 2022 even with the proposed development. The proposed development would therefore not prejudice investment being secured for these existing centres.</p>	Hill PDA
<p>d. The EIS specified the Minchinbury bulky goods precinct is an underperforming precinct. However as the precinct has a new Homemaker Centre (18,000sqm) and Masters Home Improvement Centre (13,500sqm) this is difficult to understand.</p>	<p>As recognised in the EIA, the older bulky goods premises in Minchinbury (i.e. Minchinbury Home Town) are likely to be under trading which reflects the older nature of existing buildings, their location in relation to passing traffic, and competition. It thus reflects the individual characteristics of buildings within the cluster and is not indicative of bulky goods retail demand in the locality. The Masters store will go some way to improving the perception of the precinct for bulky goods development.</p>	Hill PDA
<p><b>3. Impact of retail centre trade area</b></p> <p>a. The EIS classifies the retail component of the proposal as a Village Centre. Yet the Metropolitan Plan for Sydney characterises village centres as up to 5,500 dwellings and walking catchment of 400-600 to medium density housing. Council will not increase densities in the area.</p>	<p>The EIA described the proposal as a Village Centre due to its proposed size, scale and retail mix of the retail and business premises floorspace proposed (supermarkets and specialty shops). It is the appropriate size and retail mix of a Village Centre, notwithstanding the fact that there is not medium density surrounding it. In any case the definition in the Metropolitan Plan is a broad guide for classification purposes and is not meant to be prescriptive.</p>	Hill PDA
<p>b. The identified trade area of Rooty Hill Centre covers half of the Rooty Hill Centre. The proposal will therefore significantly</p>	<p>As indicated in the EIA and Supplementary Report, in the MPD report the village centre component:</p> <p><i>The primary trade area (PTA) is defined as comprising parts of Minchinbury</i></p>	Hill PDA

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<p>impact on commercial businesses in this centre.</p>	<p>and Rooty Hill, straddling the Great Western Highway and is limited to the north by the alignment of the railway.</p> <p>A secondary trade area (STA) is defined to be bounded to the north by the railway line, to the east by Reservoir Road, to the south by the Western Motorway and to the west by the Westlink M7. This STA encompasses the suburbs of Eastern Creek and Doonside and parts of Arndell Park and Huntingwood.</p> <p>The MPD report assumed that the convenience centre component of the proposal will capture 65% of retail turnover from these catchments with the remainder to be captured by other centres including Rooty Hill.</p> <p>Hill PDA's review of the MPD report as discussed in Table 7 of the Supplementary Report indicates:</p> <p><i>Whilst the 65% capture of total food and grocery expenditure from residents in the MTA is reasonable, Hill PDA would argue that the proportion of capture from the PTA would differ to the STA.</i></p> <p><i>An ALDI supermarket is located on the eastern edge of the STA and a full line Woolworths supermarket is located in Prospect just outside the eastern boundary of the STA.</i></p> <p><i>As a result, Hill PDA would assume capture of supermarket expenditure at around 70% from the PTA (assuming the provision of a full line supermarket on the subject site), however much less from the STA.</i></p> <p><i>Those residents in the STA who work in the likes of Minchinbury and travel east along the Great Western Highway during afternoon and evening peak times are more likely to use retail provision on the subject site due to ease of access. This is as compared to residents of the STA who work in the likes of the Huntingwood, Arndell Park or elsewhere.</i></p> <p>As reiterated in Section 5.2 of the Supplementary Report:</p> <p><i>This trade area would generate \$329m in total household expenditure in 2011 of which \$152m is associated with food and liquor expenditure. By 2016 expenditure would increase to \$361m of which \$168m would be associated with food and liquor expenditure.</i></p> <p><i>Hill PDA estimated that the convenience retail centre component which is included in Stage 1 of the proposal will achieve turnover sales of \$62.5m in its first full year of operation, which for the purpose of assessing impact was assumed to be in 2016. This indicates that the convenience retail centre component of the proposal represents only 17.3% of total household expenditure in the trade areas in 2016 (\$361m), with the remaining 82.7% of expenditure to be captured by other and higher order centres such as Mt Druitt, Rooty Hill, Rainbow Shopping Centre, Blacktown CBD and Penrith CBD.</i></p>	
<p><b>4. Inadequate identification of bulky goods trade area.</b></p> <p>The trade area identified in the EIS appears extremely limited given the proposed floorspace.</p> <p>Fails to acknowledge existing regional road networks.</p> <p>Fails to mention the significant employment area of Marsden Park Industrial Precinct in the North West Growth Centre.</p>	<p>The EIA does consider Marsden Park and the growth centres in defining the bulky goods trade area as follows: (page 34-35):</p> <p><i>"The potential to attract bulky goods expenditure from residents beyond the Main Trade Area (MTA) to the south is likely to be limited given the distances involved and the extent of existing and planned future bulky goods floorspace in this area. Significant bulky goods provision is planned as part of the South West Growth Centre (e.g. Leppington Major Centre and Crossroads), and therefore the extent to which residents would be prepared to travel from this area to Eastern Creek to purchase bulky goods is likely to be limited.</i></p> <p><i>The potential to attract spend from MTA to the north is likely to be limited particularly due to the 50,000sqm of bulky goods floorspace planned at Marsden Park which will include a Bunnings and possibly an IKEA. There is also considerable bulky goods provision in the likes of Castle Hill, Rouse Hill Major Centre and Baulkham Hills which are meeting the immediate needs of these residents.</i></p> <p><i>The strength of existing provision in the likes of Penrith, Castle Hill, Parramatta and Auburn will limit the extent of the bulky goods MTA to the east and west."</i></p> <p>Note that in peer reviewing the economic related documentation associated with this proposal, SGS concurred with the extent of the bulky goods trade area which Hill PDA defined. SGS note that:</p> <p><i>"In general, the defined trade area for bulky goods retailing on the subject site is considered appropriate, given the potential to attract bulky goods expenditure from residents outside the MTA is limited by either the travel</i></p>	Hill PDA

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	<i>distance/time involved or the significant provision of existing and planned bulky goods retailing outside the trade area (as outlined in Hill PDA's report)<sup>7</sup>.</i>	
<p>b. Council is aware that Bunnings, Masters, Costco and Ikea plan to relocate to Marsden Park.</p> <p>The EIS relies heavily on Costco and Ikea relocating to the site.</p>	<p>The EIA references these as the type of retailers which could potentially occupy the proposed large format retail tenancy. We note not expect or assume that these will be the end tenants.</p> <p>The Supplementary Report recognises that the greatest relative turnover impacts of the proposal relate predominately to the impacts of food, grocery and supermarket type floor space. This is based on the assumption that a large format retail premises which sells a proportion of food and grocery items would be accommodated in the Hub. We note that:</p> <p><i>For the purpose of the assessing impact, Hill PDA assumed the large format retail premises sold a component of food and grocery items. There is no Standard Instrument LEP definition or universal definition of large format retail premises and the term is usually just grouped under 'retail premises' although it can be understood as referring to a physically large retailer. At a large scale such retail premises could include single warehouse type retail stores typically greater than 10,000sqm and drawing from a large catchment. If a large format retailer that sells food and grocery items is not secured at the Hub, the large format retail tenancy may well be occupied by another non-food related bulky goods retailer.</i></p>	Hill PDA
<p>c. The identified trade area excludes the North West Growth Centre but relies on dwelling growth targets in the North West and South West Growth Centres to justify population and demographics in the trade area.</p>	<p>The MPD report relied on dwelling forecasts for the Growth Centres as the trade area for bulky goods on the subject site within the MPD report included the Growth Centres.</p> <p>However, Hill PDA's adjusted trade area for bulky goods removed the Growth Centres. Only population projections relevant to the Hill PDA adjusted trade area have been used for the purposes of the Hill PDA EIA and exclude the growth centres.</p>	Hill PDA
<p><b>5. Unacceptable impacts on existing centres</b></p> <p>a. The EIS discussed retail impact on a number of retail and bulky goods centres in Blacktown, and specifies the proposal will rely on redirecting expenditure from existing centres to justify viability of the proposed centre.</p>	<p>Any new retail development will initially redirect expenditure from other and surrounding centres. This is a matter of competition only and not a material planning consideration beyond the extent to which the vitality or viability of existing centres would be jeopardised, including consideration of the new facilities that would be provided.</p> <p>However, the proposal will still allow a significant amount of expenditure to be captured by other centres. Furthermore, both the MPD report and Hill PDA's Supplementary Report noted the significant growth in retail expenditure generated forecast for the trade areas and which will be available to all centres including the proposal. The proposal will go some way to meeting significant growth in retail demand within the City of Blacktown over time. The Blacktown Planning Strategy (2012) recognises:</p> <ul style="list-style-type: none"> <li><i>In 2007 the residents of the City generated sufficient demand for over 580,000sqm of retail floor space. By 2036 it is forecast that this demand will increase by approximately 691,000sqm to 1,270,000sqm across the City. The greatest demand for retail floor space will occur in the Supermarkets and Grocery Stores, Bulky Goods Stores and Personal and Household Retailing Sectors.</i></li> </ul>	Hill PDA
<p>b. The main impacts of the proposal will be on Rainbow Shopping Centre, Holbeche Road, Rooty Hill and Evans Road by 2016. By 2022, the EIS suggests there will be market corrections and that the main impacts will be on Blacktown, Mount Druitt, Doonside and Evans Road. Bulky goods impacts would occur at Homebase Prospect, Minchinbury and Seven Hills.</p>	<p>The trade area will experience growth in available expenditure over time as a result of population growth and growth in real retail spend. As such, existing centres can expect to increase their trading levels as there will be more available expenditure in the trade area.</p> <p>The gravity model assesses impacts over time and finds that the trading impacts of the proposed development will be mitigated by growth in available expenditure over the 2011 to 2016 and 2011 to 2022 period. Furthermore, the role of smaller centres is to serve a localised walking catchment. This role would not be jeopardised by the proposal.</p>	Hill PDA
<p>c. While the EIS acknowledges reduced turnover at these centres, it justifies this by stating that it is not the role of the planning system to consider competition between individual traders.</p>	<p>It is the impact on the centre as a whole that is the pertinent consideration when assessing economic impact, not individual traders.</p>	Hill PDA
<p>d. The Court of Appeal found in Randall that economic impacts of a proposal on commercial businesses could be considered</p>	<p>The Draft Competition SEPP (2010) was published more recently than the Randall judgement. Draft SEPPs are matters of relevance in the determination of development applications however we note that due to the</p>	Hill PDA

<sup>7</sup> Source: Page 9, Peer Review of EIA for Eastern Creek Business Hub, SGS (2013)



Key Issues	Response	Response prepared by
under Section 79C(1)(b) of EP&A Act. The scale of impacts on other centres is significant and there are discrepancies with identification of the trade area.	length of time now passed since the Draft Competition SEPP was published it is no longer a relevant planning consideration. SGS has peer reviewed the trade areas on behalf of the Department and concurs with them.	
e. Given that the trade area identified is limited, the scale of impacts would be even greater.	<p>The main principles in the gravity model are that:</p> <ul style="list-style-type: none"> <li>Like for like stores compete with one another. That is a grocery/ food retailer will compete with existing grocery/ food retailers in the locality, and likewise with specialty stores;</li> <li>The level of redirected expenditure from a centre is directly proportional to the turnover of that centre. Hence more expenditure will be drawn from a centre that has higher trading levels; and</li> <li>The level of redirected expenditure from a centre is indirectly proportional to the distance from the Subject Site in terms of drive time. This is based on the premise that shoppers will try to minimise distance, time and travel costs when travelling to undertake shopping – particularly “chore” shopping (predominantly for food, groceries and other regular items).</li> </ul> <p>The Hill PDA Supplementary Report indicates:</p> <ul style="list-style-type: none"> <li><i>For the large format retailer, the extent of the trade area will depend on the end occupant. Should the occupant sell a component of food and grocery items, then the impact is likely to be spread further (but thinner) than that which was considered within the EIA. The greatest relative turnover impacts of the proposal relate predominately to the impacts of food, grocery and supermarket type floor space. This is based on the assumption that a large format retail premises which sells a proportion of food and grocery items would be accommodated in the proposal. The gravity model is likely to over-emphasise the economic impacts of the supermarket, food and grocery floor space accommodated at the Hub given it has assumed the large format retailer redirects turnover only from a certain number of surrounding centres. In reality, the large format retail premises will attract trade from a much larger trade area. Therefore its impacts and redirection of turnover would be spread thinly across a larger number of centres than those listed in the gravity model.</i></li> <li><i>It should also be noted that for the purpose the assessing impact, Hill PDA assumed the large format retail premises sold a component of food and grocery items. If a large format retailer that sells food and grocery items is not secured at the Hub, the large format retail tenancy may well be occupied by another non-food related bulky goods retailer. Should this occur, the turnover of the food and grocery component of Stage 1 of the proposal would almost halve. The impact on centres such as Mt Druitt, Blacktown and Rooty Hill will decrease significantly due to less food and grocery turnover being redirected from these centres to the Hub.</i></li> <li><i>A large format retail premises without a food and grocery component lessens the impact on existing retail and convenience centres significantly, including smaller centres such as Myrtle Street Prospect, Rainbow Shopping Centre, and Evans Road Rooty Hill which by 2016 will all still trade at higher levels than they did in 2011 without the proposal. The results show that whilst there is a redirection of retail dollars away from these centres, the level of impact can be absorbed and the centres will still enjoy sales growth.</i></li> </ul> <p>The convenience centre component has a smaller trade area due to its local shopping role. Its impacts are likely to extend to those centres within its trade area that accommodate similar store types. However, it will also capture a proportion of turnover from outside of its trade area due to infrequent or “one off” shopping trips, hence the convenience component of the proposal will redirect a small proportion of expenditure from centres outside its trade area, which was also accounted for in the gravity model.</p> <p>The trade area for the bulky goods component is much larger, and hence centres a much further distance from the proposal were considered and the impacts on these centres considered.</p> <p>SGS has peer reviewed the trade areas on behalf of the Department and concurs with them.</p>	Hill PDA
<b>6. Failure to consider the loss of employment in existing and planned</b>	Council’s submission reiterated their desire for the subject site to be a job generator, indicating that there may be job losses elsewhere from the	Hill PDA

Key Issues	Response	Response prepared by
<p><b>centres.</b></p> <p>a. The EIS fails to acknowledge loss of employment from other centres from redirected expenditure.</p>	<p>proposal. This may be the case even if other employment uses on site (e.g. commercial office park) were being pursued. However employment on site upon full completion (in excess of 1,000 full and part time jobs) will more than make up for any minor retail job losses elsewhere.</p> <p>The proposal would provide additional employment which would contribute towards achieving the job targets of both the City of Blacktown and the North West Subregion as nominated within the Metropolitan Plan for Sydney 2036 and Draft North West Subregional Strategy (2007).</p> <p>We note that:</p> <ul style="list-style-type: none"> <li>There are currently no jobs provided on site. Some land within the site is leased for horse agistment however it is not a commercial operation. Hence the no development scenario does not support any additional job opportunities.</li> <li>The retail uses proposed on the subject site could support a combination of approximately 1,021 permanent full and part time jobs upon completion in a range of retail store types.</li> <li>Direct jobs associated with the proposed development would predominately be related to shopfloor staff. These jobs are typically flexible and can therefore assist in securing work for young first -time entrants to the job market, older members of the workforce, mothers returning to the workforce etc.</li> <li>The newer format bulky goods retailers in Australia are also increasingly seeking to improve their market share by offering skilled employees on site, for example some home improvement stores provide tradies in-house to advise customers. As such the proposed development could assist in widening the range of jobs available to local residents.</li> <li>Multiplier jobs which would be supported would be in a wide range of industries such as transport and logistics, building, design, architecture, catering etc.</li> </ul>	
<p><b>HERITAGE – GENERAL COMMENTS</b></p> <p>The envelope and building controls will do little to prevent large massive buildings with little architectural merit. Given context near school and residential this is not appropriate.</p> <p>It is unclear what cut and fill controls there will be for the site to achieve a flat site which bulky retail developers prefer.</p>	<p><u>Graham Brooks &amp; Associates Response:</u></p> <p>This is an urban design consideration, not heritage. The school and immediate residential buildings mentioned are not heritage items, or a heritage conservation area.</p> <p>Refer to a response to this issue prepared by Graham Brooks and Associates at <b>Appendix 16</b>.</p> <p><u>Architectus Response:</u></p> <p>Refer to the updated Design Guidelines at <b>Appendix 11</b> and related discussion at Section 3.7.</p> <p>Cut and fill controls have been added to the updated Design Guidelines. Refer to <b>Section 3.7</b> and the Design Guidelines at <b>Appendix 11</b>.</p>	<p>Graham Brooks &amp; Associates</p> <p>Architectus</p>
<p><b>Historical Archaeological Assessment</b></p> <p>The historical significant items discussed in the report did not acknowledge that the two former Begg houses and the school are highly likely to remain sub surface. This should not stop use of the site but archaeological monitoring of three sites should be required for ground works.</p> <p>The report should assess the potential significance of the remains if found.</p>	<p>The Baseline Historical Archaeological Assessment identified the location of two 'Beggs' houses and the former school located at the southern end of the site.</p> <p>However, based on the subsequent land use history and a site inspection, the assessment indicated that it is unlikely that any substantial features or deposits associated with the historical use of the study area survive at the site.</p> <p>Potential historical archaeological remains at the site associated with the Beggs houses or the school, should they exist, would be disturbed and would most likely comprise disparate objects associated with previous occupation of the site. Such disturbed remains, should they survive at the study area, are unlikely to have State or local heritage significance. As a result, the remains would not considered to be 'relics', as defined by the Heritage Act 1977.</p> <p>The Baseline Historical Archaeological Assessment identified that no further work is required prior to development, in relation to historical archaeology.</p>	<p>Archaeological and Heritage Management Solutions (AHMS)</p>
<p><b>Heritage Impact Statement</b></p> <p>This HIS report does not address heritage remains on the development site, only impacts on surrounding heritage items.</p> <p>The views from the top of Rooty Hill will</p>	<p>The Statement of Heritage Impact addresses the statutory heritage controls that apply to the site. As no part of the subject site is identified as a heritage item in any statutory register, the applicable controls are those of the Blacktown LEP 1998 relating to development in the vicinity of a heritage item.</p> <p>The view study, prepared by Architectus, shows that views to the proposed</p>	<p>Graham Brooks &amp; Associates</p>

Key Issues	Response	Response prepared by
<p>have greatest impact. The view analysis only evaluates impact of one view.</p> <p><i>"The proposed development will be visible from some parts of the State listed site, and the heritage report needs to establish where these areas are and if they are significant, and if they can be mitigated."</i></p> <p>The view from Rooty Hill and Bungarribee should show the full potential extent of buildings (ie. to 12-15m high).</p> <p>The HIS does not investigate community comment that there had been Army Encampments on site.</p> <p>In summary, the development controls need to be tightened for the site.</p>	<p>development from the top of The Rooty Hill will be obscured by the existing vegetation on the lower slopes, and at the base of, the hill. These images are included as Figures 5.2 and 5.3 of the Statement of Heritage Impact.</p> <p>As the State Heritage Register curtilage of The Rooty Hill extends south to Church Street there will be some views to the proposed development from the Church Street frontage of this item. The significant view from The Rooty Hill is that of the wider locality available from its peak, not the foreground views at its perimeter. Thus, the Statement of Heritage Impact concludes there will be no adverse impact on the established significance of The Rooty Hill.</p> <p>The Bungarribee Homestead Complex is an archaeological heritage item listed on the NSW State Heritage Register. It is not included on the <i>Blacktown LEP 1998</i> heritage schedule.</p> <p>As noted in the Statement of Heritage Impact, prior to its demolition the Bungarribee homestead was a significant landmark in the Doonside / Rooty Hill area. The recent residential subdivision in the immediate vicinity of the Bungarribee Homestead Complex has been designed to retain view corridors to the surrounding landscape.</p> <p>Although there is no statutory requirement to consider views from this item it was included in the Architectus view study which shows that the proposed development will not be readily visible from the site of the former Bungarribee homestead. These images are included as Figures 5.8 and 5.9 of the Statement of Heritage Impact.</p> <p>An historical summary of the site development is included in the Baseline Archaeological Impact Assessment and not the Statement of Heritage Impact.</p> <p>There are no heritage development controls applying to the site.</p>	
<b>DRAINAGE</b>		
<b>FLOODING</b>		
Flooding impact are to be reviewed:		
a. "Allow for a minimum Mannings 'n' of 0.05 within the channels."	The Mannings 'n' adopted in the modelling is 0.035. This is generally accepted as an appropriate value for straight, grass lined channels where the average depth of flow is more than double the height of the vegetation. An alternate, more natural channel configuration will be considered with stacked rock walling. This will increase the hydraulic capacity of the channel and minimise the impact of increased flow depths due to a Mannings 'n' value of 0.05 as requested by the Council.	John Wyndham Prince
b. "Assess the flow through the downstream outlet culverts to determine the backwater effects for a range of storm events including the PMF."	The capacity of the downstream culverts will be discussed in the report. The impact of the PMF and egress from the site will be included in the report.	John Wyndham Prince
c. "Set floor levels for the development at a minimum of 0.3m above the 1 in 100 year ARI flood level due to climate change in the channel."	Noted. This has been allowed for in the design.	John Wyndham Prince
<b>STORMWATER QUANTITY</b>	A discussion on backwater flood levels will be included in the report.	John Wyndham Prince
d. Review location of the detention basin with the backwater flood levels in the outlet culverts.		
e. Stormwater detention is required for the southern catchment to ensure that the post development flows for all storms from 1 in 1 year ARI to 1 in 100 year ARI do not exceed the pre development flows. Assuming all area drains into the basin (with no bypass) the minimum storage volume is to be 264 m <sup>3</sup> /ha in the 1 in 100 year ARI event.	The investigation included assessment of the 5 and 100 year ARI storm events. Results for other ARI storm events, including the 1 year ARI, will be included in the report. All of the developed area in the southern catchment drains to the basin. The storage provided for the catchments draining to the basin is 446m <sup>3</sup> /ha. Even including the undeveloped catchment bypassing the basin the storage provided is 315m <sup>3</sup> /ha so exceeds this requirement.	John Wyndham Prince
f. The catchment area for the southern catchment is to include the site area for development, rain garden, detention basin area and part of road 1 as bypass.	The southern catchment does include the site area for development, raingarden and detention area. Part of Road 1 (the southern section) can drain to the basin, the remaining bypassing section will drain to the north, as shown on Figure 4. The hydrology model has been provided to Council.	John Wyndham Prince
g. The catchment area for the northern catchment is to include the site area for	The northern catchment includes the site area for development. The preliminary development layout within this catchment may allow some of the	John Wyndham

Key Issues	Response	Response prepared by
development, with road 2 and part of road 1 as bypass. Calculations are to be provided to detail generic permissible site discharges and volumes for each lot.	road to drain to a detention basin, depending on the final configuration. Nevertheless, the road can be included as bypassing. The volume of detention required on a per hectare basis has been included in the report (420m <sup>3</sup> /ha). A per hectare volume rather than a lot based volume was chosen as the lot sizes may change.	Prince
h. Council will not be responsible for the maintenance of the large detention basin for the southern catchment.	Noted.	John Wyndham Prince
<b>STORMWATER QUALITY</b> i. For the southern catchment the water quality needs to be provided in accordance with current integrated Water Cycle Management standard in their DCP.	Water quality has been undertaken in accordance with Council's DCP, using the source node data and rainfall data. Allowance has also been made for the bypassing road area. This is all described in detail in the Stormwater Management Strategy report. The water quality model has been provided to Council.	John Wyndham Prince
j. For the northern catchment, the water quality needs to be provided on each lot in accordance with current integrated Water Cycle Management standard in their DCP.	On-lot water quality treatment for the northern catchment has been allowed for, as discussed in the Stormwater Management Strategy. The generic nodes within the MUSIC modelling do not give distorted results. They have been configured to give the total load reductions required to meet Council's water quality targets. As agreed with Council, the only treatment node included in the water quality modelling for the northern catchment will be a generic treatment node. In the Stream Erosion Index assessment other treatment nodes that are likely to be adopted on site will be incorporated, otherwise the Stream Erosion Index will be higher than can be realistically expected.	John Wyndham Prince
k. Water conservation is required for a minimum of 80% of the non-potable usage to be met through rainwater.	The water quality modelling allows for this. The model has been provided to Council.	John Wyndham Prince
<b>OTHER</b> l. Splay corners are required to Rooty Hill South Road and the internal road intersection.	Noted.	Architectus
m. A Vegetation Management Plan and positive covenant needs to be provided over the woodland and conservation areas.	Eco Logical's Addendum to the Ecological Assessment at <b>Appendix 12</b> states: <i>"The conservation area in the eastern half of the site is proposed as a future biobank site and subsequently this site will undergo a range of works to improve and/or maintain its current ecological condition.</i>  <i>Management of the site will be detailed in a Construction and Operation Environmental Management Plan (OEMP) and this will span the length of construction works and the post-construction phase. This plan will be updated when necessary as works progress. This plan covers both the conservation and development areas of the Eastern Creek Business Hub site and details mitigation measures such as erosion and sediment control and topsoil and weed management."</i>  Should it be deemed by the consent authority that a Vegetation Management Plan is required in addition to the OEMP, and the application of a positive covenant, these can be applied as conditions of consent.	Architectus
<b>TRAFFIC</b> 1. Additional traffic generated can be mitigated by improvement measures in the Traffic report.	Agreed.	Traffix
2. Do not support changes at the intersection of Francis Road/Eastern Rd and Rooty Hill Road South. There is no justification that if the change is implemented it would be successful. "The proposed arrangement will significantly reduce the efficiency of the operation of this signalled intersection."	Council's response suggests that the proposal would result in left-turning vehicles (from Rooty Hill Road South [RHRS] south approach) being delayed by through traffic, by virtue of the nearside lane being a shared left-through lane. However, the current lane arrangement already has a shared left-through lane. This intersection may warrant further investigation.  NOTE: RMS is silent on the assessment of this intersection; therefore, although we disagree with Council's position, we consider that both options are feasible.	Traffix
3. Council does not support direct vehicular	This is not unexpected considering the existing and forecasted volumes of	Traffix

Key Issues	Response	Response prepared by
access to Building 3 off Rooty Hill Road South.	traffic on RHRS.	
4. Should this access be retained, a deceleration lane must be provided.	<p>This indicates that Council is prepared to accept a left-in and left-out access in this location. It should be noted that the length of the left-turn slip (deceleration) lane would be a minimum of 60m in length.</p> <p>NOTE: The RMS comments indicate that it does not support the access and no alternative arrangement is mentioned (please refer to our RMS response for further comments).</p>	Traffix
5. The proposed convenience retail in the village centre could attract people from adjacent residential areas. Due to safety concerns, measures need to be put in place to prevent people crossing the road at this location and encourage crossing at the signalised intersection.	<p>This issue is acknowledged and measures will be required. The RMS and Council have recommended future installation of a central median to Rooty Hill South Road, that can later accommodate a fence to deter pedestrians crossing the road at these locations. Pedestrians would instead be encouraged to cross at the future signalised pedestrian crossings. The central median would have breaks in it to accommodate future right turn lanes travelling southbound along Rooty Hill South Road. The subdivision plan has been amended to accommodate a road widening for these future road improvements.</p> <p>NOTE: It is recognised that relocating the signalised access to a more central location as requested by RMS would be more favourable for pedestrian movements across RHRS; however, we recommend maintaining the Cable Place access location.</p>	Traffix & Architectus
<b>ECONOMIC DEVELOPMENT</b> <u>Trade Area</u> <p>The trade area catchments are questioned and are too narrow. The location and accessibility to major regional roads should be given greater weighting over other considerations. It should include a larger area including to the north.</p>	<p>As indicated in the MPD report and Hill PDA's EIA and Supplementary Report, the trade area for the proposed convenience floorspace and bulky goods/ LFR floorspace would be different. The convenience centre would serve a localised trade area only, however the gravity model still recognises that the convenience centre will capture a proportion of spend from centres outside of its trade area including some turnover from centres to the North.</p> <p>The bulky goods/ LFR trade area would serve a significantly larger trade area. Hill PDA reviewed the trade areas within the MPD report as provided in the Supplementary Report. The convenience retail centre trade area was considered appropriate. Amendments were made to the trade area of the bulky goods component given (as Council noted in their submission), it should be recognised that significant bulky goods are planned for in the growth areas which would reduce the ability of the proposal to capture retail spend from these areas.</p> <p>SGS has peer reviewed the trade areas on behalf of the Department and concurs with them.</p>	Hill PDA
<u>Need for more diversity of employment</u> <p>Analysis of ABS Population and Employment forecasts suggests the present jobs shortfall for Western Sydney (200,000 in 2010 projected to 300,000 by 2031) will require greater share of higher-order employment. Therefore economic analysis should be couched in this context (economic benefits and long terms forecasts of rezoning to business park).</p>	<p><u>Hill PDA Response:</u></p> <p>Employment generated on the Subject Site would not be at the expense of other employment opportunities, given that the overall impact on employment from the proposal would be net positive, as over time competing centres will still increase their trading levels. Furthermore, the subject site does not currently provide significant employment.</p> <p>Supporting additional employment should be viewed as positive, not a negative, as it will assist in stimulating the economy and support economic development.</p>	Hill PDA
<u>Bulky Goods Retailing</u> <p>The Bulky Goods Retailers Association in a submission to the Productivity Commission suggested State governments identify floorspace targets for bulky goods retailing, which has merit.</p> <p>Concerned there will be oversupply of bulky goods retailing in Blacktown.</p>	<p><u>Hill PDA Response:</u></p> <p>As indicated in the Supplementary Report:</p> <ul style="list-style-type: none"> <li>MPD determined that the level of demand for bulky goods retail (including homemaker floor space) throughout the MTA is currently around 380,700sqm. This is projected to increase to 539,600sqm over the period to 2026, a total increase of 158,900sqm. This represents demand for an additional 9,950sqm of bulky goods retail floor space each year (applying a simple straight line average). MPD suggests that there is currently an undersupply of bulky goods premises in the order of 128,000sqm in 2011 which will decrease to 109,800sqm in 2014, 86,700sqm in 2016, but increase again to 132,500sqm by 2026.</li> <li>Given the adjusted trade area, Hill PDA recalibrated the results of the</li> </ul>	Hill PDA

Key Issues	Response	Response prepared by
	<p>expenditure modelling. Based on Hill PDA's adjusted assumptions, there is undersupply of 69,600sqm of bulky goods floor space in 2011, decreasing to 25,600sqm in 2014. By 2026, this undersupply will increase to 53,250sqm of bulky goods floor space.</p> <ul style="list-style-type: none"> <li>In 2010, Hill PDA undertook an assessment of retail and employment floor space demand in the City of Blacktown to 2036<sup>8</sup>. Hill PDA's assessment indicated the City of Blacktown will generate demand for an additional 620,000sqm of total retail floor space between 2007 and 2036<sup>9</sup>. Of total growth, around 100,000sqm of floor space demand is associated to supermarket and grocery stores and 155,000sqm is associated to bulky goods premises.</li> <li>The Blacktown Planning Strategy (2012) indicated that in 2007 the residents of the City generated sufficient demand for over 580,000sqm of retail floor space. By 2036 it is forecast that this demand will increase by approximately 691,000sqm to 1,270,000sqm across the City. The greatest demand for retail floor space will occur in the Supermarkets and Grocery Stores, Bulky Goods Stores and Personal and Household Retailing Sectors.</li> </ul> <p>Note that the extent of demand for the scale of the proposed development has been confirmed by Hill PDA, MPD and SGS.</p> <p><u>Architectus Response:</u> The Large Format Retail Association's (LFRA, and formerly known as the Bulky Goods Retailers Association submission of 14 September 2011 to the Productivity Commission responded to the draft recommendations released on 4th August 2011 in relation to the review into the Economic Structure and Performance of the Australian Retail Industry. The BGRA agreed with the Productivity Commission that as long as sufficient land was rezoned at the strategic planning stage (<i>by governments – local and state</i>), with sufficiently broad uses in 'employment zones', this should enable all retailers to locate in areas where they judge they can best compete - and planning should be able to accommodate even the newest of current (<i>retail</i>) business models requiring significant floor space. Under such conditions, a new retail proposal in a non-designated area should be rare. However, if a new retail proposal in a non-designated area arose, considerations of externalities such as traffic congestion and the viability of existing or planned new centres can be an important aspect of city planning which may justify accepting some reduction in competition.</p> <p>Architectus notes that Blacktown Council has not undertaken a strategic planning process as defined in the BGRA's submission to rezone land to address the major supply side forecasts for all retail and commercial development (including bulky goods retail). Instead it is anticipated that such a process will ideally progress as part of Blacktown Council's response to the sub-regional employment targets of the Sydney Metropolitan Strategy, as well as the new White Paper sub-regional delivery plan and local plan regime. These processes will enable governments (local and state) to allocate sufficient 'employment zones' in a sub-region, capable of a 15 year growth horizon to meet retail and commercial growth demands. This would entail the review of all existing activity centre boundaries, the supply of available land and the existing network of Centres on a sub-regional basis. It may also warrant the development of many new centres where existing centres cannot accommodate specific land uses – or meet the required land supply targets.</p> <p>In the absence of this pending sub-regional strategic planning process, the ECBH proposal must be dealt with under the current planning requirements, which acknowledge the catchment areas of retail and large format retail development which naturally extends into a sub-regional planning model beyond council's boundaries. And it has been clearly demonstrated via Hill PDA's analysis that the proposal will meet supply forecasts into this broader catchment, not exceed supply.</p>	Architectus
1. Council owns half of Beggs and Belmore	Agreed	Western

<sup>8</sup> Source: Blacktown Planning Strategy Economic and Employment Input, Hill PDA (2010)

<sup>9</sup> Source: Blacktown Planning Strategy Economic and Employment Input, Hill PDA (2010)

Key Issues	Response	Response prepared by
Roads. Since the proposal will not utilise this land as roads, Council request that these roads are formally closed prior to subdivision or Stage 1 early works commencing.		Sydney Parklands Trust
2. Draft Design Guidelines – these focus on providing building envelopes and car parking rates – and not bulk/scale/massing of proposed buildings with regard to parklands setting and heritage view lines to the Rooty Hill.  Nor do they provide for orientation of buildings to the Parklands.  The site will require significant cut and fill and the controls do not respond to this (eg. No retaining walls or maximum cut and fill levels).	In regard to heritage view lines, refer to response to 'Heritage' above and the updated Visual Analysis at <b>Appendix 10</b> . Graham Brooks has also responded to this issue at <b>Appendix 16</b> .  The building envelopes have been oriented to address Rooty Hill South Road and the new internal access road, to provide an appropriate street presence to these frontages. The balance of the site that will not be developed for new buildings will be dedicated for conservation purposes, and public access to these areas will not be encouraged (they will be fenced off for public access to allow regeneration).  The Design Guidelines have been updated to address cut and fill across the site by incorporating new controls. Refer to the updated guidelines at <b>Appendix 11</b> .	Architectus

### Environment Protection Authority

Table 2. Response to Submission from Environment Protection Authority

Key Issues	Response	Response prepared by
The environmental impacts can be managed through appropriate environmental management measures.  Under the <i>Protection of the Environment Operations Act 1997</i> , the EPA is the regulatory authority for public authorities, so the EPA will be the ARA for the construction of ECBH.	Noted.	Architectus

### NSW Heritage Council

Table 3. Response to NSW Heritage Council

Key Issues	Response	Response prepared by
Based on the information provided, it appears there is likely to be no impact on items of heritage significance or archaeological relics.	Noted	Architectus
Any consent should include a condition that states that if substantial intact archaeological deposits are found then all works should cease and the Heritage Council notified.	Agreed	Architectus
This above condition should form part of any Environmental Management Plan or similar for the project.	Noted	Architectus

## NSW Office of Environment and Heritage

Table 4. Response to Submission from NSW Office of Environment and Heritage

Key Issues	Response	Response prepared by
<b>Biodiversity</b> OEH supports the amelioration and offset measures for removal of the EEC on site. It recommends that conditions of consent include the requirement to retire the 46.3 biobank ecosystem credits prior to clearing of any vegetation.	Agreed	Eco Logical
Some of the descriptions of the habitat associations for species in the Threatened Species Likelihood of Occurrence tables in Appendix A of the ecological report include habitats that appear to occur on site. However the species are described as being not likely to occur on site without justification.	<p>Whilst it is agreed that all three of these flora species are known to occur in degraded sites or after disturbance, the following rationale is provided as to why they were not considered to occur at the site prior to survey:</p> <ul style="list-style-type: none"> <li>* Age and paucity of records in the immediate proximity to the subject site,</li> <li>* The enclosure of the site by urban development and infrastructure, including the M7 motorway and Great Western Highway, limiting colonisation success from disjunct populations.</li> </ul> <p>It is noted that an extensive survey did take place along the M7 motorway corridor within the previous 10-20 year period (as part of the EIS - which was reviewed for this project), and no records of threatened flora were made in proximity to the site and added to the Atlas of NSW Wildlife. It is also noted that the remnant to the north of the subject site, The Rooty Hill and Morreau Reserve, are readily accessible intact remnants of vegetation, though no records of threatened flora occur in either of these locations.</p> <p>Whilst the above reasoning is provided as justification of this flora being unlikely to occur at the subject site, ELA consider adequate survey effort has been undertaken across the site to locate any previously under reported populations. This includes a targeted independent flora and habitat survey undertaken by Wayne Olly of the Western Sydney Conservation Alliance.'</p>	Eco Logical
The ecological report notes that with implementation of the Biodiversity Offsets Strategy and subsequent biobanking agreement there would be no significant impacts to threatened species or ecological communities. However in accordance with the Assessment of Significance Guidelines (DECC 2007) " <i>proposed measures that mitigate, improve or compensate for the action, development or activity should not be considered in determining the degree of the effect on threatened species, populations or ecological communities.</i> "	<p>Works were assessed in accordance with the (Draft) NSW Department of Environment and Conservation and Department of Primary Industries "Guidelines for Threatened Species Assessment" which outlines the important factors and or heads of consideration that must be considered by proponents and consultants when assessing potential impacts on threatened species, populations or ecological communities or their habitats for development applications assessed under Part 3A of the EP &amp; A Act. As this development is considered State Significant Development (an equivalent of the former Part 3A development types) this was considered the appropriate assessment guideline to use.</p> <p>Section 2 of this document - factors to consider when preparing a development application - refers to Appendix 1 for the preferred structure and content for a threatened species report.</p> <p>Appendix 1 outlines the various sections of threatened species assessment report - the subheadings given are:</p> <p>Introduction,</p> <p>Methods,</p> <p>Results,</p> <p>Impact Evaluation: Describe the context and intensity of impacts</p> <p>Mitigation: Discuss measures to minimise impacts such as measures to avoid impacts, mitigation measures, amelioration measures and offset strategies.</p> <p>Conclusion</p> <p>References</p> <p>Appendices</p>	Eco Logical



Key Issues	Response	Response prepared by
	<p>The impact evaluation section in Appendix 1 of this guideline does not advise that proposed measures that mitigate, improve or compensate for the action should not be taken into account.</p> <p>The threatened species guideline that OEH referred to (DECC 2007) the actual wording from this guideline is "Proposed measures that mitigate, improve or compensate for the action, development or activity should not be considered in determining the degree of the effect on threatened species, populations or ecological communities, unless the measure has been used successfully for that species in a similar situation".</p> <p>The Office of Environment and Heritage appears to have left off the last words of that sentence, which completely change the context of the sentence. It is considered that the use of the NSW OEH system of Biobanking is considered to be an effective and successful mitigation measure. Given that many state government agencies are currently reliant on Biobanking of CPW vegetation for their activities within the Sydney Region Growth Centres, then Biobanking for CPW vegetation in Western Sydney must be being acknowledged by OEH as a successful mitigation measure.</p>	
<b>Aboriginal Cultural Heritage</b> Those parts of the Aboriginal Cultural Heritage report does not quantify describe or map which parts of the site inspected have been subject to heavy, moderate or light disturbance.	Details of previous landuse disturbance are provided in Sections 4.4 and 4.4.1 and also in Plate 1. Further specific information is presented in Section 6.1. When justifying the presence of PAD's in Section 6.3 the primary consideration is the presence/absence of intact archaeological deposits. Intact archaeological deposits are locations that have been assessed as being subject to light levels of previous disturbance, conversely areas where there is an absence on intact archaeological deposits are locations where there have been high levels of previous disturbance. See Figure 10 for a graphic representation of this assessment.	Kayandel Archaeological Services
The report states that due to highly disturbed nature of the site, the significance of any archaeological evidence will be of low to moderate significance, but does not define what these two categories mean.	<p>A significant component in the assessment of archaeological significance is the ability to recover cultural material from the original context in which it has been deposited or discarded in the landscape. As large proportions of the subject area have been subject to large degree of disturbance in the past. The significance criteria employed in the assessment are derived from the Burra Charter and are an accepted framework for which to undertake a significance assessment. Measurements of significance are generally provided on the basis of Low, Moderate or High in relation to each of the identified significance criteria, further distinctions can be made by creating categories of Low-Mod and Mod-High, but in this instance we determined to be unnecessary. Once the individual significance criteria are assessed an overall significance level can be established. In the case of the assessment criteria employed in the assessment the following apply.</p> <p>Rarity and Representativeness: an assessment of low in this criteria indicates that the Aboriginal sites and/or PAD's are common and very generally there nature is consistent with other sites in the general vicinity.</p> <p>Moderate would indicate the aboriginal sites and/or PAD's are not common but also not unexpected and that their nature is also consistent with other similar sites on the region.</p> <p>Research Potential: an assessment of low indicated the Aboriginal site and/or PAD has limited or no intact artefact bearing deposits or is disturbed/damaged to the point where scientific methodologies cannot be easily applied to gain information on the archaeological resource. Moderate indicates that a larger proportion of the Aboriginal site and/or PAD contain intact artefact bearing deposits and that scientific methods are more easily applied to interpret the archaeological record.</p>	Kayandel Archaeological Services
The potential archaeological deposits (PADs) identified in a 2009 report have been retained, yet the preliminary report does not adequately describe the landscape setting and nature of any associated archaeological evidence to support their locations. There are no clear justifications for location of PADs, and therefore no rationale for placement of test excavations.	<p>The subject area is generally flat ground, with a gentle slope towards the east and south east. The northernmost end of the subject area comprises the foot of Rooty Hill.</p> <p>Section 6.3 provides justification for each of the PAD locations. Generally the PAD locations are defined by areas where no identified disturbance has taken place previously, and are therefore the locations where undisturbed archaeological deposits may exist. Given the limited surface visibility during the survey a conservative assessment of PAD has been made. The rationale for placement of test excavations at this early stage is to establish presence and/or absence of Aboriginal objects within the identified areas of PAD and to</p>	Kayandel Archaeological Services

Key Issues	Response	Response prepared by
	confirm the assessment made to date that deposits within the areas of PAD do contain relatively intact soil profiles. After these two elements have been sufficiently identified then further excavations may be undertaken to inform additional assessment of nature, extent and significance of the archaeological deposits.	
Test excavations should be undertaken as part of the assessment process. Results from test excavations should be incorporated into an assessment of heritage values.	Agreed	Kayandel Archaeological Services
<b>Floodplain Risk Management</b> OEH considers the determination of flood impacts up to the 1 in 100 year ARI event have been adequately addressed in the Water Cycle Management Strategy report. However a supplementary figure is required that delineates the modelled 100 year ARI and Probable Maximum Flood (PMF) extents on the eastern side of the development site. Hydrological modelling of the PMF extent for the site should be undertaken.	It is unclear of the purpose for mapping the flood extents east of the development. Flood mapping in this area would require a separate flood assessment as flows will be going everywhere, particularly in the PMF. The flood assessment would be a reasonably significant exercise. If absolutely required, could be a condition of consent.	John Wyndham Prince
The Hydrological Analysis section should be supplemented with information on the local catchment hydrological model for the PMF for existing and developed case flows. Include performance of proposed detention storages and implications for emergency management and response.	An assessment of the proposed detention storages will obviously show that they overtop in the PMF. The southern detention basin will overtop into the undeveloped land east of the development. The northern site detention storages will be on lot and are yet to be configured. PMF events in the local catchment will be short duration with virtually no warning times. People would either have to shelter on site or evacuate via Rooty Hill Road. A brief evacuation strategy section can be added to the report if required, or conditioned in a consent.	John Wyndham Prince
OEH considers that all issues relevant to flooding impacts have been adequately addressed in relation to Blacktown City Council's DCP 2006 and Engineering Guide for Development, including overland flooding from upstream catchments. Provision of detention basins to mitigate development changes to the 100 year ARI is adequately determined.	Noted.	John Wyndham Prince
Modelling of local catchments is conservative and reasonable. However a supporting figure is required that shows the 100 year ARI and PMF extents of mainstream flooding.	See comments above.	John Wyndham Prince
Supplementary information is also required for overland flow which considers the impact of a PMF, increased rainfall intensity from climate change, and emergency management issues.	See comments above. The potential impacts of climate change are discussed in the report.	John Wyndham Prince

### Sydney Regional Development Advisory Committee

**Table 5. Response to Submission from Sydney Regional Development Advisory Committee**

Key Issues	Response	Response prepared by
<b>Proposed Access Road</b> RMS does not support the location of the proposed access road opposite Cable Place due to existing geometry.	Refer to Addendum to TMAP report prepared by Traffix at <b>Appendix 7</b> which specifically responds to each of these issues.	-

Key Issues	Response	Response prepared by
Alternative placements are the Cawarra Street/Rooty Hill Road South or the Penfold Street/Rooty Hill Road South intersections. However approval for traffic signal installation is dependent on warrants for signalisation being met.		
Signals at these alternative locations will ensure that traffic within the residential precinct on the western side of Rooty Hill Road South will be attracted to the controlled intersection to access Rooty Hill Road South, this providing a community benefit. It would also provide direct access from the residential precinct to the development, as well as access to and from the development.	As above	
If signals are warranted, RMS would restrict right turn vehicular movements during peak traffic periods at uncontrolled intersections along Rooty Hill Road South.	As above	
The proponent and the department should consult with Council and residents about these peak hour restrictions and installation of traffic signals.  The potential impact on the proposed Rooty Hill Road South signals on the Great Western Highway/Cawarra Street and the Great Western Highway/Penfold Street intersections should be considered.	As above	
If access arrangements are changed to provide vehicular access to Church Street, RMS will not support signalisation of Church Street/Rooty Hill Road South intersection due to its close proximity to the Evans Street/Rooty Hill Road South signalised intersection.  Consider concrete median in Rooty Hill South Road across the Church Street/Rooty Hill Road intersection to restrict vehicular movements to left in/left out only at Church Street.	As above	
<b>2. Proposed left in / left out access to proposed liquor outlet</b>  RMS does not support any driveway access points to the development along Rooty Hill Road South.  The left in/left out access along Rooty Hill Road South at the proposed liquor store is not supported on road safety and network efficiency grounds. Access to liquor store should be provided internally within the development.	As above	
<b>Proposed intersection improvements to the Great Western Highway / Rooty Hill Road South intersection</b>  The traffic modelling for the Great Western Highway / Rooty Hill Road South and the Great Western Highway / M7 ramps intersections should be revised using UK Transyt 14, using traffic stream methods. Sidra is not suitable as it models intersections in isolation and doesn't account for queue spill back issues at adjoining intersections.	As above	

Key Issues	Response	Response prepared by
Revised modelling should account for current and future traffic conditions and should be consistent with the Sidra modelling.	As above	
Required amendments listed above should be submitted to the Department for further referral to the RMS.	As above	

## Sydney Water

Table 6. Response to Submission from Sydney Water

Key Issues	Response	Response prepared by
<b>Water</b> The drinking water main for connection is the 150mm main on the eastern side of Rooty Hill Road.	Noted.	Architectus
<b>Wastewater</b> A wastewater extension is required to serve the development.	Noted.	Architectus
<b>Trade Waste Information</b> If the development generates trade waste water, the owner is required to submit an application for permission to discharge trade wastewater to the sewerage system before business activities commence. A boundary trap will be required.	Noted.	Architectus
If development is 'industrial' then the property must be part of sewerage catchment subject to a wastewater reuse scheme. A boundary trap will be required.	Noted.	Architectus
<b>Sydney Water Servicing</b> Sydney Water will further assess the development when the developer applies for a Section 73 Certificate. This will assess any works required as a result of the development and assess if amplification/changes to the systems are required.	Noted.	Architectus
The developer should engage a Water Servicing Coordinator to obtain a Section 73 Certificate.	Noted.	Architectus

## Blacktown and District Environment Group

Table 7. Response to Submission from Blacktown District Environment Group

Key Issues	Response	Response prepared by
When the plan for the Parklands was announced several years ago, it was declared they would be the "Lungs of Sydney". It was looked on as a substantial gain for conservation.	Noted.	Eco Logical Australia
However a number of developments including Landcom housing, M7 motorway, sporting fields and now the Business Hub	Noted.	Eco Logical Australia

Key Issues	Response	Response prepared by
has isolated areas of the park and taken out areas for conservation purposes.		
The proposed development will take out hundreds of indigenous trees that provide hollows for habitat.	5 hollow bearing trees recorded on site – current proposed layout should retain 3, and possibly 5 but unable to tell until detailed design is done.	Eco Logical Australia
There are stands of trees satisfying threshold for TSC Act listed ecological communities but not all stands will be protected. One such area is proposed for a car park.	Impacts offset through biobanking site at Chandos West. Additionally eastern portion of site will be rehabilitated in future as part of additional biobank site.	Eco Logical Australia
Even areas of weed infestation have become habitat and foraging space for wrens and other small birds.	Site does contain stands of trees and EEC but in poor condition. Eventually with the restoration works proposed in the eastern portion and the improvement to drainage through the western portion, the overall ecological value of the site will be greater than at present. Better to have native habitat on site for birds and other fauna than weeds.	Eco Logical Australia
The drainage lines provide potential habitat for frogs, eels and tortoises.	Noted in the FFA report and the formalised drainage lines will continue to provide that habitat while decreasing the impact on retained CPW from current surface flows.	Eco Logical Australia
Suggest tree retention for landscaping purposes, particularly aged trees.	This is a recommendation of the FFA report.	Eco Logical Australia
Any revegetation for a conservation zone should be accelerated to provide potential for habitat for displaced fauna.	WSPT already gave commitment to that – WSPT should detail what this commitment is if they haven't already.	Eco Logical Australia

### Helen and Peter Beck

**Table 8. Response to Submission from Helen and Peter Beck**

Key Issues	Response	Response prepared by
Strongly object to the proposal for the following reasons:	Refer to Addendum to TMAP report prepared by Traffix at <b>Appendix 7</b> .	
1. The proposed median strip from Cawarra St to Cable Place. It is currently impossible to turn into homes from the southern end, as you have to cross on to the opposite side which can only happen when there is no on-coming traffic or traffic behind you.	It is proposed there will be breaks in the proposed median strip, and that the RMS in the future will construct right-hand turn lanes travelling south along Rooty Hill South Road into Cawarra Street and Minchinbury Street	Architectus
2. Rooty Hill Road South is already a "speedway" and the proposal will bring more traffic.	As above	
3. The proposed entrance road and lights at Cable Place – this would be a big problem as there is often a back log of traffic in each direction.	This has been modelled in the Linsig Report supporting the Addendum to TAMP. Refer to these reports at <b>Appendix 7</b> .	Architectus
4. Reconsider the location of the entrance road.	The location of the proposed access road is the most logical from the point of view of minimising traffic impacts and increase in traffic movements in the residential areas, and also in terms of superlot subdivision of the site accounting for optimum footprint of buildings on the site, which require large floorplates. Moreover, the location of the proposed access road is at the location suggested by Council in their submission received on the Draft Director General Requirements.	Architectus

## Dexus Property Group

**Table 9. Response to Submission from Dexus Property Group**

Key Issues	Response	Response prepared by
Dexus Property Group is managers and owners of Plumpton Marketplace Shopping Centre.	We note that Plumpton Marketplace is trading at above average levels (see Section 4.5 of the EIA) and would still experience growth in trade of 4.6% between 2011 and 2016 even with the proposed development (see Table 9 of the EIA).	Hill PDA
The proposal is not identified as an existing or potential centre in any strategic planning document or policy.	<p>The Metropolitan Plan and the Draft Centres Policy allow for flexibility for new centres to form. There is sufficient retail demand for the proposed development that cannot be met in other locations in the Trade Area. The lack of insufficient land has been demonstrated in Hill PDA's Sequential Test in their Supplementary Economic Report.</p> <p>Specifically, the development of business hubs in the parklands is discussed in the Plan of Management, where it allows for up to 2% of the parklands to be leased for the purposes of business hubs. While it does not specify the precise locations, it does require "The development of Business Hubs will only be permitted to occur on sites with low environmental and recreational values." The Supplement to the Plan of Management identifies nine locations for proposed business hubs in the Parklands.</p> <p>The subject site was one of many sites evaluated by a Working Group represented by Councils and Government, who were tasked to identify suitable locations in the parklands. The subject site was identified as comprising low environmental and recreational value. Refer to the Site Options analysis at <b>Appendix 9</b> which details the respective constraints and opportunities associated with the development of the site and other areas in the parklands.</p> <p>The purpose of undertaking the development is to raise sufficient revenue to feed back into the management and maintenance of the Parklands. These functions of the Trust are reflected in the Western Sydney Parklands Act 2006, <i>State Environmental Planning Policy (Western Sydney Parklands) 2009</i>, and the Western Sydney Parklands Plan of Management.</p>	Architectus
Approving 52,800 sqm of retail floorspace that is not identified in any strategic planning process has the potential to destabilise the current retail hierarchy in terms of trading performance and delaying or halting investment in existing centres.	<p>The MPD report demonstrates retail demand growth within the identified trade areas.</p> <p>The EIA and Supplementary Report demonstrate that the proposal will only capture a small proportion of overall retail expenditure generated by the trade areas.</p> <p>The Sequential Test within the Supplementary Economic Report indicates there are limited opportunities within surrounding centres to accommodate additional retail growth. Surrounding sites are either limited in size, are subject to mixed use or residential proposals, or will not permit retail similar to that proposed under Draft Blacktown LEP 2013.</p> <p>The Commercial Centres Strategy indicates there is an insufficient amount of commercial land within the City of Blacktown to accommodate growth in demand.</p> <p>Both the NSW Draft Centres Policy and the Metropolitan Plan for Sydney 2036 indicate hierarchies should be flexible and not rigid to allow existing centres to expand, new centres to develop and new retail formats to be accommodated.</p> <p>The Cost Benefit Analysis which is now included as part of the planning proposal package indicates development of the site for the Eastern Creek Business Hub could lead to significant positive benefits on the NSW economy.</p>	Hill PDA
The proposal does not align with the key objectives and actions of metropolitan, subregional and local strategic planning and is difficult to justify against the Parklands Plan of Management.	<p><u>Hill PDA Response:</u></p> <p>In economic terms the proposed development would support new jobs, widen access to retail provision for residents, promote competition and economic development which are all consistent with policy. The policies promote a flexible approach towards new centre development.</p>	Hill PDA

Key Issues	Response	Response prepared by
	<p><u>Architectus response:</u></p> <p>A response against the Metropolitan Plan and the Draft Metropolitan Strategy is discussed earlier in this report. The proposal is consistent with these strategies.</p> <p>The Metropolitan Plan, the Draft Metropolitan Strategy and the Draft Centres Policy 2009 allow for the creation of new retail centres. The Strategic Direction in the Metropolitan Plan that is relevant to the proposed development is, "Growing and renewing centres", with associated Policy Setting in the Metropolitan Plan including, "Plan for new centres in existing urban areas and greenfield release areas".</p> <p>The due process outlined in the draft policy has been followed for the creation of a new centre, in terms of undertaking a Sequential Test and Net Community Benefit Test. The Sequential Test analysis provides that there are no suitable, available or viable sites in other centres that could wholly or partially accommodate the quantum of bulky goods premises floorspace that is proposed on the subject site.</p> <p>A Net Community Benefit Test (NCBT) was prepared by Hill PDA and submitted to the Department for review. In considering the largely qualitative approach in the NCBT the Department favoured a more quantitative assessment and as a result Hill PDA prepared a Cost Benefit Analysis (CBA) which forms part of this planning proposal and supersedes the NCBT. The CBA which is now included as part of this Response to Submissions package indicates that the preferred option is the best performing based option based on the financial Key Performance Indicators. It also represents the least risk.</p> <p>Refer to the Supplementary Economic Report prepared by Hill PDA at <b>Appendix 5</b>.</p> <p>Specifically, the development of business hubs in the parklands is discussed in the Plan of Management. While it does not specify the precise locations, it does require "the development of Business Hubs will only be permitted to occur on sites with low environmental and recreational values", and it specifies that up to 2% of the parklands can be leased for business hubs. The site was evaluated by a Working Group represented by Councils and Government, who were tasked to identify suitable locations in the parklands. The subject site was identified as comprising low environmental and recreational value. Refer to the Site Options at <b>Appendix 9</b> which details the respective constraints and opportunities associated with the development of the site and other areas in the parklands.</p>	Architectus
The Economic Impact Assessment:		Hill PDA
Does not demonstrate a sequential approach to identifying an alternative site within established centres. Therefore it cannot be determined whether the potential expansion can accommodate future demand.	The NSW Draft Centres Policy (2009) establishes that a sequential approach should be adopted towards land rezonings which would facilitate retail and commercial development. The proposed development does not comprise a rezoning and at the stage that the EIS was submitted, a Sequential Test was not submitted. However, a Sequential Test was completed as part of Hill PDA's Supplementary Report – see previous comments.	Hill PDA
The demand analysis does not include assessment of existing floorspace per capita serving the region.	The trade areas in the MPD report and reviewed in the Supplementary Report, have been defined recognising the existence of centres and retail facilities within and outside of the trade areas. Capture rates have been used to reflect the proportion of resident expenditure (per person) which the centre could attract compared to that which would be directed towards other centres. This has been further explained in the Supplementary report.	Hill PDA
Similarly the bulky goods demand assessment only accounts for bulky goods floorspace within the main trade area.	Again the trade area used has been shaped by the existence of bulky goods floorspace / centres within the trade area, as well as considering competing centres outside of the trade area.	Hill PDA
The size of the main trade area for bulky goods component appears ambitious particularly given the recent development of a Masters store at St Mary's.	<p>The Masters store is just one tenant: alone it would not restrict the size of the defined trade area. As indicated in the Supplementary Report:</p> <p><i>Hill PDA would assume a slightly different trade area to that of MPD for the following reasons:</i></p> <ul style="list-style-type: none"> <li><i>The potential to attract expenditure from the Secondary North Trade Area is likely to be limited particularly due to the 50,000sqm of bulky goods retail floor space planned at Marsden Park<sup>10</sup> which will include a Bunnings and possibly an IKEA. This will be located adjacent to</i></li> </ul>	Hill PDA

<sup>10</sup> Source: Cordells Construction Data (2012)

Key Issues	Response	Response prepared by
	<p><i>Richmond Road and residents of the Secondary North Trade Area would need to drive past this to travel the 9km to reach the subject site. Furthermore, whilst not mentioned in the MPD Report, there is considerable existing bulky goods retail provision in the likes Castle Hill, Rouse Hill Major Centre and Baulkham Hills which are meeting the immediate needs of these residents.</i></p> <ul style="list-style-type: none"> <li><i>The potential to attract bulky goods retail expenditure from residents in the Tertiary Trade Area is likely to be limited given the distances involved and the extent of existing and planned future bulky goods retail floor space in this area.</i></li> <li><i>Significant bulky goods premises are planned as part of the South West Growth Centre (e.g. Leppington Major Centre and Crossroads), and therefore the extent to which residents would be prepared to travel from this area to the subject site to purchase bulky goods premises is likely to be extremely limited.</i></li> <li><i>Existing provision of bulky goods retail floor space in the Tertiary Trade Area is estimated within the MPD Report at over 86,000sqm, which is a considerable amount of floor space provision. As a result, it is unlikely residents of this trade area will need to travel much further for bulky goods retail shopping – particularly given provision on the subject site and surrounding precincts in Minchinbury and Prospect, are unlikely to rival the extent of retailers in the Tertiary Trade Area.</i></li> </ul> <p><i>As a result of the above, Hill PDA's trade area would be similar to that of the MPD report with the exclusion of the Secondary North Trade Area and the Tertiary Trade Area. The implications of this on demand are discussed further below.</i></p> <p>That said, the trade area is set to experience a notable growth in available expenditure over the 2011 to 2022 period and beyond, which will support further floorspace provision. A small proportion of this would be captured by the proposal whilst still allowing the majority of expenditure to be captured by other centres.</p> <p>SGS has peer reviewed the trade areas on behalf of the Department and concurs with them.</p>	
The Homebase Prospect Centre is at the interface of the primary and secondary trade areas. This suggests the eastern extent of the trade area is overstated.	<p>Again, we consider the defined trade area for the bulky goods/ LFR component to be reasonable. The proposed development would compete with the Homebase Prospect Centre and residents living in the PTA are equally likely to use either facility, if an appropriately competitive offer were provided on the subject site. Furthermore, the gravity model allows for turnover redirected to the proposal to be proportional to the distance of competing centres, hence even though the Prospect Centre and the trade area for the proposal may overlap, the amount of expenditure captured by the proposal, or the turnover redirected from the Prospect centre may be less than other competing centres.</p> <p>SGS has peer reviewed the trade areas on behalf of the Department and concurs with them.</p>	Hill PDA
The assessment relies on 2006 census data whereas 2011 census data should be used.	2011 ABS Census data was not available at the time of the EIA. The expenditure modelling is based on 2009 Marketinfo data which uses 2006 ABS data and escalated expenditure to 2011 dollars.	Hill PDA
Large format retail, bulky goods retail and supermarket are akin to new subregional shopping centre in terms of scale and impacts. This scale of centre is not identified in metropolitan, sub-regional or local level. A net community benefit assessment and sequential assessment are required.	<p>The scale of the proposed development has been tested and trading impacts on other centres have been shown to be acceptable. The Draft Centres Policy (2009) stipulates that a net community benefit test is required to accompany rezoning applications for Council consideration prior to submission to the NSW Department of Planning and Infrastructure through the Gateway test. As such, one was not prepared at the time of the EIS.</p> <p>A Net Community Benefit Test (NCBT) was prepared by the Hill PDA and submitted to the Department for review. In considering the largely qualitative approach in the NCBT the Department favoured a more quantitative assessment and as a result Hill PDA prepared a Cost Benefit Analysis (CBA) which forms part of this SSD application and supersedes the NCBT. The CBA which is now included as part of this Response to Submissions package indicates that the preferred option is the best performing based option based on the financial Key Performance Indicators. It also represents the least risk.</p>	Hill PDA



**Kendall Nicholas**

**Table 10. Response to Submission from Kendall Nicholas**

Key Issues	Response	Response prepared by
Not objecting to the development proposal. However question how traffic will be managed on Rooty Hill Road South. Believe that traffic will be worse during construction and operation.	Refer to the Addendum to TMAP at <b>Appendix 7</b> .  A Construction Traffic Management Plan will be required to be prepared as a condition of consent. This will include measures to mitigate the impacts of traffic construction of the development on surrounding areas.  In terms of traffic impacts during operation, this has been addressed in the Addendum to TMAP report. A number of traffic improvements are proposed that will mitigate the impacts. These have been factored into the Early Works and proposed subdivision.	Architectus
Wish to clarify how traffic flow in and out of Minchinbury Street, St Agnes Avenue and Church Street will be managed. Is there a plan to install additional traffic lights or roundabouts?	Refer to the Addendum to TMAP at <b>Appendix 7</b> .  At this stage there will be no traffic lights installed at these locations. However other traffic improvements will be made, for eg. provision for right hand turn lanes travelling southbound along Rooty Hill South Road into Cawarra and Minchinbury Streets.	Architectus

**Maree Williams**

**Table 11. Response to Submission from Maree Williams**

Key Issues	Response	Response prepared by
Object to liquor outlet at Rooty Hill South as they are the owner of a liquor store 500m away and therefore the proposed store will destroy their business and livelihood. There are also other liquor stores nearby	The proposed development is only indicative at this stage and is not prescriptive. End uses like a liquor outlet will not be defined within development controls for that particular site within the study area, but would form a permissible use under 'retail premises'. In any case from an economic perspective impacts on individual retailers is a matter of competition	Hill PDA & Architectus

## Westfield Development and Asset Management

**Table 12. Response to Submission from Westfield Development and Asset Management**

Key Issues	Response	Response prepared by
<p><u>Centres Policy</u></p> <p>Westfield is a supporter of a well defined and robust centres policy.</p> <p>The proposal is sub-regional function yet is not recognised in the centres policy.</p> <p>Proposal is justified only on the basis of narrow retail turnover impact and employment generation perspectives.</p>	<p><u>Architectus response:</u></p> <p>Both the Draft Centres Policy and the Metropolitan Plan indicate hierarchies should be flexible and not rigid to allow existing centres to expand, new centres to develop and new retail formats to be accommodated.</p> <p>The Strategic Direction in the Metropolitan Plan that is relevant to the Westfield submission is, "Growing and renewing centres", with associated Policy Setting in the Metropolitan Plan including, "Plan for new centres in existing urban areas and greenfield release areas". This aspect of the Metropolitan Plan is discussed below.</p> <p>The ECBH proposal satisfies the Centres Policy Elements in the Metropolitan Plan (refer to <b>Section 3.1.4</b> of the Response to Submissions). It also satisfies the Draft Metropolitan Strategy (refer to <b>Section 3.1.6</b> of the Response to Submissions), and the planning principles of the Draft Centres Policy which aim to guide future retail and commercial development (refer to <b>Section 3.1.7</b> of the Response to Submissions).</p> <p><u>Hill PDA response:</u></p> <p>The Macroplan Dimasi (MPD) report demonstrates retail demand growth within the identified trade areas.</p>	<p>Architectus</p> <p>Hill PDA</p>

Key Issues	Response	Response prepared by
	<p>The EIA and Supplementary Report demonstrate that the proposal will only capture a small proportion of overall retail expenditure generated by the trade areas.</p> <p>The Sequential Test within the Supplementary Report indicates there are limited opportunities within surrounding centres to accommodate additional retail growth.</p> <p>The CBA which is now included as part of this planning proposal package indicates that the preferred option is the best performing based option based on the financial Key Performance Indicators. It also represents the least risk.</p>	
<p>EIS quantifies turnover impact on Mount Druitt Shopping Centre as \$42 million pa. This represents 11% impact and is significant. Mount Druitt is envisaged to evolve into a major centre.</p> <p>Consistency with the Park's Plan of Management is not an appropriate basis for assessing merits of the new retail facility.</p>	<p><u>Hill PDA response</u></p> <p>The impact stated on Mt Druitt (\$42m in 2016) is a point in time impact only and is on all retailers in the centre, not just those in the Shopping Centre. The 11% impact figure quoted relates to the Westfield only - Mt Druitt is larger than just this facility. Furthermore this is a point in time impact which does not account for the growth in trade which the centre will experience over time due to population and expenditure growth. The impacts quantified are within the normal competitive range and would not threaten the role, function or viability of the centre. Moreover the Shopping Centre is trading well at above average levels based on published data (Shopping Centre News, see Section 4.3 of the EIS) and can sustain the point in time impacts identified. Indeed even with the proposed development the centre will experience growth in captured trade over the 2011 to 2016 period.</p> <p><u>Architectus response:</u></p> <p>The ECBH proposal satisfies the Centres Policy Elements in the Metropolitan Plan and the Draft Metropolitan Strategy. It also satisfies the planning principles of the Draft Centres Policy which aim to guide future retail and commercial development. Refer to the relevant sections in the Response to Submissions (<b>Sections 3.1.4, 3.1.6 and 3.1.7</b>). Furthermore, the development is substantiated by the Sequential Test and Cost Benefit Analysis prepared by Hill PDA, which demonstrate that there is insufficient land to accommodate the development. Furthermore, that the benefits of the proposal outweigh the costs, and that the site demonstrates more benefits relative to costs than the other sites examined.</p>	<p>Hill PDA</p> <p>Architectus</p>
<p>The proposal has not been assessed for net community benefit due to departure from the existing centres hierarchy.</p>	<p>Hill PDA completed a NCBT pertaining to ECBH at the request of the Department. Subsequent to completing and issuing the NCBT to the Department for peer review, a more quantitative Cost CBA approach was requested by the Department. This request is fulfilled in this CBA report is included in this planning proposal package and which replaces the NCBT.</p> <p>The CBA finds that relative to the other sites examined, the site demonstrates a strong net community benefit eventuating from the proposed development, had the greatest chance of realisation, and the least associated risk.</p>	<p>Hill PDA</p>
<p>It is a lax planning framework that has enabled this proposal which does not provide certainty for Mt Druitt Centre to grow.</p>	<p><u>Architectus response:</u></p> <p>The planning framework provide for the flexibility for new centres to form under certain circumstances. The Metropolitan Plan, the Draft Metropolitan Strategy, and the Draft Centres Policy all provide this flexibility. As State Government or Blacktown Council have not undertaken the demand and supply assessments for bulky goods premises, which is required by these policies, Hill PDA has undertaken this assessment and determined that there is insufficient land to accommodate the proposal and there is forecast expenditure and demand relative to future population growth, to substantiate the proposal.</p> <p><u>Hill PDA response:</u></p> <p>Mt Druitt is still forecast to increase its trading levels to 2016 even with the proposed development. The proposed development would increase retail choice and competition locally, both of which would benefit local residents. We note that Council's Masterplans allow for an additional 10,400 dwellings in Mt Druitt which will create significant additional expenditure which could be captured by the centre.</p>	<p>Architectus</p> <p>Hill PDA</p>

Key Issues	Response	Response prepared by
	<p>The Supplementary Report also indicates:</p> <ul style="list-style-type: none"> <li>Westfield reports that its Mt Druitt shopping centre trade area accounts for almost 165,000 persons and as indicated in the following trade area map largely includes an area bounded by: Erskine Park in the south; Rooty Hill in the east; Dean Park, Hassell Grove and Wilmot in the north; and, Dunheved, St Marys and St Clair in the west<sup>11</sup>.</li> <li>Westfield Mt Druitt will capture a significant amount of food and grocery expenditure from the trade area; however those that visit Westfield Mt Druitt from further afield will do so largely for comparative goods shopping and discretionary spending (e.g. clothes, electronics, and discount department store items). That said, they may undertake dual shopping trips whilst there, whether within Westfield Mt Druitt or at other retailers and services within the Mt Druitt centre. For example, a shopper may visit Westfield Mt Druitt primarily for clothes outlets, but may also do food and grocery shopping at ALDI (located outside of Westfield) and visit the library or medical centre. However, it is likely that their local shopping centre will still retain a large proportion of their regular chore shopping expenditure.</li> <li>Westfield reports that its Mt Druitt trade area generates total retail expenditure equivalent to \$1.7billion<sup>12</sup>. However, Westfield Mt Druitt is capturing only 22% of total retail expenditure available in its trade area, given it recorded turnover of \$378.7m in 2011<sup>13</sup>.</li> <li>This indicates there is a significant amount of retail expenditure generated by the trade area which is available to other retailers within the Mt Druitt centre, as well as other centres either within the trade area or elsewhere. The next largest centre within the Westfield Mt Druitt trade areas is St Marys Town Centre (63,600sqm of retail and commercial floor space) followed by Rooty Hill Village which is significantly smaller (around 16,700sqm of floor space). Outside of the trade areas it is likely that centres such as Penrith CBD and Blacktown CBD are capturing a large proportion of expenditure.</li> </ul>	
<p><b>Park Plan of Management</b></p> <p>The Park's Plan of Management is "self serving" and shouldn't be the primary tool to justify the proposal in planning terms.</p>	<p>The Metropolitan Plan, the Draft Metropolitan Strategy, and the Draft Centres Policy allow for the creation of new retail centres. The due process outlined in the draft Centres Policy has been followed for the creation of a new centre, in terms of undertaking a Sequential Test and Net Community Benefit Test (NCBT). The Sequential Test analysis provides that there are no suitable, available or viable sites in other centres that could wholly or partially accommodate the quantum of bulky goods premises floorspace that is proposed on the subject site.</p> <p>A NCBT was prepared by the Hill PDA and submitted to the Department for review. In considering the largely qualitative approach in the NCBT the Department favoured a more quantitative assessment and as a result Hill PDA prepared a Cost Benefit Analysis (CBA) which forms part of this planning proposal and supersedes the NCBT. The CBA which is now included as part of this Resposne ot Submissions package, indicates that the preferred option is the best performing based option based on the financial Key Performance Indicators. It also represents the least risk.</p> <p>Refer to the Supplementary Report prepared by Hill PDA at <b>Appendix 5</b>.</p> <p>A response against the Metropolitan Plan, the Draft Metropolitan Strategy, and the Draft Centres Policy is discussed earlier in this report. The proposal is consistent with these strategies.</p> <p>Specifically, the development of business hubs in the parklands is discussed in the Parkland's Plan of Management. It specifies, "<i>The development of Business Hubs will only be permitted to occur on sites with low environmental and recreational values.</i>" The site was evaluated by a Working Group represented by Councils and Government, who were tasked to identify suitable locations in the parklands. The subject site was identified as comprising low environmental and recreational value. Refer to the Site Options at <b>Appendix 9</b> which details the respective constraints and opportunities associated with the development of the site and other areas in the parklands.</p>	Architectus & Hill PDA

<sup>11</sup> Source: <http://www.westfield.com/corporate/property-portfolio/australia/mtdruitt.html> (December 2012)

<sup>12</sup> ibid

<sup>13</sup> Source: Shopping Centre News Big Guns 2011

Key Issues	Response	Response prepared by
There is a misalignment between the desired character for the site (maintain cultural significance, recreational) in the Plan of Management and the proposed concept.	<p>The Plan of Management provides that up to 2% of the parklands can be leased for business hubs, for the purpose of raising revenue for the management of the parklands. It does not identify the locations. The Supplement to the Plan of Management goes further to identify the locations of the business hubs.</p> <p>The adopted plan of management contains some guidance in the 'Parkland Precinct' plans and associated 'Precinct Management Guidelines'. These are to be used as a guide only, and do not definitively set out where the respective land uses and activities are to be located which is the purpose of Precinct Plans that are adopted separately under Section 27 of the Western Sydney Parklands Act 2006. To date no such Precinct Plans have been adopted.</p> <p>The proposed development will be consistent with the priorities for "Precinct 3 – Rooty Hill" in the Plan of Management because it will provide significant areas to dedicate for conservation and will rehabilitate these areas; will provide stormwater infrastructure that will benefit the broader catchment; will provide landscaping; and will provide for areas for recreation and play (children's playground at the 'village centre').</p> <p>The Plan of Management provides that the Trust will form Consultative Committees with Liverpool, Fairfield and Blacktown City Councils to explore locations and land uses for the business hubs. That process was followed in selecting the sites now included in the Supplement.</p> <p>A Working Group represented of Council and Government agencies was convened to identify suitable locations for the business hubs. The subject site was identified for the proposed development in summary because it represented the least recreational and environmental value of all of the possible sites in the Parklands.</p> <p>Refer to response above in relation to the selection of the site for the proposed development. Also refer to the Site Options at <b>Appendix 9</b>.</p>	Architectus
<p><u>Draft Competition SEPP</u></p> <p>The Competition Review made the clear point of need for the planning system to provide a level playing field for entrants.</p> <p>The proposal is clearly anti-competitive in that it prejudices established centre operators. This is inconsistent with the Competition SEPP which aims to "remove anti-competitive barriers in environmental planning and assessment."</p>	<p>Chapter 8 of the EIA notes the proposed development complies with the Draft SEPP:</p> <ul style="list-style-type: none"> <li>By providing new retail floorspace and new types of retailers it would support competition in this locality; and</li> <li>The retail impact of the proposed development is not likely to prejudice the commercial viability of existing centres in the surrounding area. Beyond this, it is not the role of the planning system to consider the trading impacts on individual retailers.</li> </ul> <p>The proposed development would promote competition in the retail sector by allowing new entrants into the market. Restricting the development of new retail facilities and formats would be anti-competitive. In any case, as noted previously due to the length of time passed since publication of the EIA, the Draft SEPP is no longer a consideration for planning proposals based on guidance in the Consideration of draft EPIs under Section 79C of the EP&amp;A Act (P5 08 – 013, 13th November 2008). This mandates that draft Environmental Planning Instruments which have not been made in 3 years from exhibition should no longer be considered.</p> <p>Furthermore the Sequential Test within the Supplementary Economic Report indicates there are no suitable, available, economically or financially viable site opportunities within surrounding retail centres to accommodate additional retail development. Both the NSW Draft Centres Policy and the Metropolitan Plan indicate hierarchies should be flexible and not rigid to allow existing centres to expand, new centres to develop and new retail formats to be accommodated.</p>	Hill PDA
<p><u>Policies, Guidelines &amp; Planning Agreements</u></p> <p>Inconsistent with Metropolitan Strategy 2036 that promotes the centres approach, and concentrating activity in accessible centres, etc. There should have been an assessment of alternatives sites, including not in WSP. Justification should be provided why cannot locate the proposal in Mt Druitt Potential Major Centre.</p>	<p><u>Architectus response:</u></p> <p>The Metropolitan Plan, the Draft Metropolitan Strategy, and the Draft Centres Policy, all allow for the formation of new centres outside of the centres hierarchy, under certain circumstances. The proposed development is consistent with these policies.</p> <p><u>Hill PDA response:</u></p> <p>As this proposal does not require a rezoning, a sequential sites assessment is not mandated consistent with the NSW Draft Centres Policy (2009).</p>	<p>Architectus</p> <p>Hill PDA</p>

Key Issues	Response	Response prepared by
	<p>That said, a Sequential Test was undertaken and is provided in the Supplementary Report. The key centres and bulky goods retail precincts examined as part of the Sequential Test included:</p> <ul style="list-style-type: none"> <li>• Mt Druitt retail centre;</li> <li>• Rooty Hill retail centre;</li> <li>• Minchinbury bulky goods retail precinct; and</li> <li>• Blacktown bulky goods retail precinct (in Blacktown CBD).</li> </ul> <p>The Sequential Test indicates there are no available, suitable or viable sites for retail development in and on the fringe of surrounding centres including Mt Druitt (as well as Rooty Hill and Minchinbury) to accommodate additional retail development. Those sites that are available are either:</p> <ul style="list-style-type: none"> <li>• <i>Of an insufficient size or would require significant amalgamation with surrounding sites;</i></li> <li>• <i>Are the subject of residential or other development approvals;</i></li> <li>• <i>Are intended for higher order uses within Council master plans and strategies; or</i></li> <li>• <i>Are to prohibit bulky goods under proposed zones within Draft Blacktown LEP 2013.</i></li> </ul>	
<p><u>Draft North West Region Sub-Regional Strategy</u></p> <p>The NWRSRS reinforces metropolitan centres, including Blacktown and Mt Druitt. It refers that in developing out of centre retail that these areas should complement rather than compete with centres. The net community benefit criteria will continue to apply.</p>	<p>Hill PDA originally completed a NCBT pertaining to the ECBH proposal at the request of the Department. Subsequent to completing and issuing the NCBT to the Department for peer review, a more quantitative CBA approach was requested by the Department. This request is fulfilled in this CBA report is included in this Response to Submissions package and which replaces the NCBT.</p> <p><u>Architectus response:</u></p> <p>The Draft North West Strategy states under NW B4.1.2 (Centres and Corridors):</p> <p>“In developing out of centre retail, such as the bulky goods area along Mulgoa Road, it will be important to ensure that these areas complement rather than compete with centres.”</p> <p>The reference to “complement rather than compete with centres” is considered an incorrect phrase to use, as most retail premises use will compete with other retail premises use; it is the nature of commercial retailing, and it ensures that retailers act for consumers in terms of keeping prices low, etc, which is in the public interest.</p> <p>The issue should be whether there would be a significantly adverse impact on existing centres. This issue has been addressed by Hill PDA in their Supplementary Economic Report, which details that the retail impact on trading of other centres over time is expected to be less than 10%, which is within a healthy competitive range. Refer to the Economic Response to Submissions report prepared by Hill PDA for further details.</p>	<p>Hill PDA</p> <p>Architectus</p>
<p><u>Blacktown City Commercial Centres Strategy</u></p> <p>If this document is still a draft document then it should not be addressed.</p>	<p><u>Hill PDA response:</u></p> <p>Chapter 8 of the EIA and Table 23 of the Supplementary Report addresses the Commercial Centres Strategy. Of particular note, as identified within the Supplementary Report, the Commercial Centres Strategy notes that:</p> <ul style="list-style-type: none"> <li>• <i>Significant population growth is forecast to sustain centres.</i></li> <li>• <i>Mt Druitt is a very good performing centre with opportunities for expansion and nominates Mt Druitt as a Major Centre by Council definition but a Town Centre based on DoPI definitions.</i></li> <li>• <i>Rooty Hill is nominated as a Village Centre with 16,000sqm of convenience retail floor space. The Rooty Hill centre remains larger than the convenience retail component of the proposed Eastern Creek Business Hub.</i></li> <li>• <i>Given bulky goods was excluded from the Commercial Centres Strategy, the Strategy nominates that a bulky goods retail supply and demand assessment should be undertaken and a strategy for bulky goods retail established. Currently no bulky goods retail clusters outside of centres such as those within the Minchinbury precinct, Prospect Homebase or Blacktown Mega Centre are recognised within the</i></li> </ul>	<p>Hill PDA</p>

Key Issues	Response	Response prepared by
	<p><i>Strategy, although it could be argued that they are operating as centres.</i></p> <ul style="list-style-type: none"> <li><i>With reference to out-of-centre development, the Strategy advocates providing land in suitable locations well ahead of anticipated demand, an outcome which the proposed development at the Eastern Creek Business Hub is seeking to achieve.</i></li> <li><i>The Strategy indicates that the City has insufficient commercial land to accommodate likely demand and therefore there may be a need to zone additional land for commercial purposes beyond 2014. The proposed development is in response to this identified undersupply of commercial land and is in accordance with the recommendations of the Strategy.</i></li> </ul> <p><u>Architectus response:</u></p> <p>At the time of preparation of the Environmental Impact Assessment for ECBH, the Blacktown Commercial Centres Study was not available on Council's website. However Council's website today states that the Centres <u>Analysis</u> (prepared in 2007) was adopted in April 2011.</p> <p>The Blacktown Commercial Centres Analysis has been addressed in the Response to Submissions at <b>Section 3.1.10</b>.</p>	Architectus
<p><u>Blacktown Planning Strategy</u></p> <p>This document sets out vision for centres and Urban Structure Plan for the LGA which does not include the site.</p>	<p><u>Architectus response:</u></p> <p>The Blacktown Planning Strategy 2036 adopted by Blacktown City Council, defines and locates their centres in their LGA. It discusses 'out of centre' retailing, and defines existing 'out of centre' retailing hubs in Blacktown LGA as the Blacktown Mega Centre, Parklea Markets, Prospect Home Base and Minchinbury Home Town and refers to these as "as vital 'out of centre' retail outlets". These bulky goods premises retailing hubs are not defined as centres in Blacktown's centres hierarchy, and yet these hubs are proposed to be zoned B5 Business Development in the Draft Blacktown Local Environmental Plan 2013, which will ensure they continue operating as bulky goods precincts. The bulky goods premises component of the ECBH proposal is consistent with the approach of Blacktown Council to their 'out of centre' retailing, and furthermore, there is forecast demand for the quantum of proposed retail floorspace relative to supply. Refer to Hill PDA's following response in relation to the other matters.</p> <p><u>Hill PDA response:</u></p> <p>This is not relevant to economic impact. However as indicated within Table 26 of the Supplementary Report:</p> <p><i>The Blacktown Planning Strategy is Council's key strategic land use planning document that will facilitate and manage future growth and development within the City of Blacktown to 2036. The Blacktown Planning Strategy recognises:</i></p> <ul style="list-style-type: none"> <li><i>The City is expected to grow over the next 25 years to a population of 500,000 people. The bulk of this population growth is largely based on the State Government's dwelling targets for the North West Growth Centre and the established areas of the City.</i></li> <li><i>In 2007 the residents of the City generated sufficient demand for over 580,000sqm of retail floor space. By 2036 it is forecast that this demand will increase by approximately 691,000sqm to 1,270,000sqm across the City. The greatest demand for retail floor space will occur in the Supermarkets and Grocery Stores, Bulky Goods Stores and Personal and Household Retailing Sectors.</i></li> <li><i>Strategy 3: Planning for a Growing Population recognises significant growth in the City, and predicts that an additional 33,300 persons will live in the Mt Druitt Precinct by 2036. The majority of the population growth will be housed through an increase in residential densities located around the Mount Druitt Major Centre.</i></li> <li><i>In response to projected growth within the City, Strategy 3 plans for predicted population growth by ensuring there is sufficient zoned and serviced land to meet the increased demand in housing, employment, infrastructure and services, open space and recreation, culture and entertainment, and community services and facilities.</i></li> <li><i>A greater number of jobs in the retail industry should be encouraged for</i></li> </ul>	<p>Architectus</p> <p>Hill PDA</p>

Key Issues	Response	Response prepared by
	<p><i>the following reasons: there is a substantial growth in demand for retail services forecast for the City, the industry is the second largest generator of employment (for residents of all 3 City Precincts), 60% of residents employed in this industry are required to leave the City for employment opportunities.</i></p> <ul style="list-style-type: none"> <li><i>Retail development should give consideration to the City's retail hierarchy.</i></li> </ul> <p>In consideration of the above, the EIS, EIA and Supplementary Report indicate that the proposal has considered the City's retail hierarchy, will meet significant growth in demand from the population and will ensure additional commercial land is provided to meet the increased demand in employment and facilities to meet the growing needs of the community.</p>	
<p><b>Concept Proposal Built Form and Urban Design</b></p> <p>The proposed design guidelines are self-serving and do not include street activation zones, built form relationship to public domain and architectural treatments, that would normally be expected for retail centres.</p>	<p>The Design Guidelines include an 'Illustrative Village Centre Landscape Master Plan'. This provides for specific works that will provide for street activation, such as outdoor café and seating and children's playground. It also shows relationship with possible shopping centre and convenience retail and the public domain.</p> <p>A large component of the Guidelines includes built form controls to ensure that design quality and good built form outcomes can be achieved on the site. This includes guidance on architectural treatments under the 'General design guidelines' and guidance on materials and finishes, articulation zones, and landscape frontage zones (that includes controls for the public domain).</p> <p>It should be noted that as this predominantly a Concept Application, it is important not to constrain the development outcome on the site by overly prescribing the form and relationship of built form and public domain elements.</p>	Architectus
<p><b>Economic Impact</b></p> <p>The turnover impacts on Mt Druitt centre will be significant and should not be at the expense of undoing planning policy on which investment decisions have been based.</p>	<p>As indicated in the EIA and Section 5.3.1 of the Supplementary Report:</p> <ul style="list-style-type: none"> <li><i>If Stage 1 of the Eastern Creek Business Hub <u>did proceed</u> in 2016 as proposed, the gravity model indicated \$42.4m of the Hub's \$175.3m in turnover would be redirected from the Mt Druitt centre to the subject site, with the remainder drawn from other surrounding centres. Therefore the direct or point in time impact of the proposal on the Mt Druitt centre would be a reduction in total potential retail sales from \$526.6m to \$484.2m in 2016 (-\$42.4m or -8.1%).</i></li> <li><i>However, Mt Druitt (like all centres) will enjoy growth in real retail expenditure and population growth between 2011 and 2016. Hence the difference between Mt Druitt total estimated sales in 2016 with the proposal (\$484.2m) and the turnover of the centre in 2011 (\$470m) is \$14.2m. Therefore, even with the proposal, the centre will still enjoy growth in total centre sales between 2011 and 2016 (+\$14.2m or sales growth of +3%).</i></li> </ul> <p>Furthermore as indicated in the EIA and again in the Supplementary report:</p> <ul style="list-style-type: none"> <li><i>The convenience retail centre component of the proposal represents only 17.3% (\$63m) of total household expenditure in the trade areas in 2016 (\$361m), with the remaining 82.7% of expenditure to be captured by other and higher order centres such as Mt Druitt, Rooty Hill, Rainbow Shopping Centre, Blacktown CBD and Penrith CBD.</i></li> <li><i>Hill PDA estimated that Stage 1 bulky goods premises will achieve turnover sales of \$32.5m in 2016, which will increase to \$65.4m in 2022 with the addition of Stage 2 of the proposal. This indicates that the bulky goods premises component of the proposal represents only 4% of total expenditure available in the trade area in 2016 (\$830m) and 6% of total trade area expenditure in 2026 (\$1,033m). This indicates the proposal would account for only a very small proportion of overall bulky goods retail expenditure generated by the trade area and would allow the majority to still be captured by other centres within the trade areas.</i></li> </ul> <p>Hence, over 80% of expenditure generated by the trade areas will still be available to other centres. As also indicated in the Supplementary Report:</p> <ul style="list-style-type: none"> <li><i>Westfield reports that its Mt Druitt shopping centre trade area accounts for almost 165,000 persons and as indicated in the following trade area map largely includes an area bounded by: Erskine Park in the south;</i></li> </ul>	Hill PDA

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	<p>Rooty Hill in the east; Dean Park, Hassell Grove and Wilmot in the north; and, Dunheved, St Marys and St Clair in the west<sup>14</sup>.</p> <ul style="list-style-type: none"> <li>Westfield Mt Druitt will capture a significant amount of food and grocery expenditure from the trade area; however, those that visit Westfield Mt Druitt from further afield will do so largely for comparative goods shopping and discretionary spending (e.g. clothes, electronics, and discount department store items). That said, they may undertake dual shopping trips whilst there, whether within Westfield Mt Druitt or at other retailers and services within the Mt Druitt centre. For example, a shopper may visit Westfield Mt Druitt primarily for clothes outlets, but may also do food and grocery shopping at ALDI (located outside of Westfield) and visit the library or medical centre. However, it is likely that their local shopping centre will still retain a large proportion of their regular chore shopping expenditure.</li> <li>Westfield reports that its Mt Druitt trade area generates total retail expenditure equivalent to \$1.7billion<sup>15</sup>. Hence Westfield Mt Druitt is capturing only 22% of total retail expenditure available in its trade area, given it recorded turnover of \$378.7m in 2011<sup>16</sup>.</li> <li>This indicates there is a significant amount of retail expenditure generated by the trade area which is available to other retailers within the Mt Druitt centre, as well as other centres either within the trade area or elsewhere. The next largest centre within the Westfield Mt Druitt trade areas is St Marys Town Centre (63,600sqm of retail and commercial floor space) followed by Rooty Hill Village which is significantly smaller (around 16,700sqm of floor space). Outside of the trade areas it is likely that centres such as Penrith CBD and Blacktown CBD are capturing a large proportion of expenditure.</li> </ul> <p>The quantum of expenditure generated by Westfield Mt Druitt's trade area also suggests that with additional dwellings planned and proposed for centres such as Rooty Hill and Mt Druitt (either through Council master plans or development approvals), resulting expenditure growth will only increase the ability of the trade areas to accommodate and sustain floor space growth.</p> <p>The Supplementary Report further references a 2010 assessment of retail and employment floor space demand in the City of Blacktown to 2036 by Hill PDA<sup>17</sup> which indicated:</p> <ul style="list-style-type: none"> <li>City of Blacktown will generate demand for an additional 620,000sqm of total retail floor space between 2007 and 2036<sup>10</sup>. This figure is equivalent to an additional 5 Blacktown CBDs (including Westpoint Shopping Centre) or an additional 7 Westfield Mt Druitt's.</li> <li>It is important to note that this figure only relates to growth from the resident population only. In addition to this will be demand for retail from the likes of workers and visitors.</li> <li>Of total growth, around 100,000sqm of floor space demand is associated to supermarket and grocery stores and 155,000sqm is associated to bulky goods premises. This growth in demand represents more than a doubling of all existing retail floor space in the City.</li> </ul> <p>Hence, whilst some of this growth will be met by centres outside the City, there is significant forecast growth in demand within the trade areas to allow existing centres to accommodate additional retail growth.</p> <p><u>Architectus response:</u></p> <p>Adopted State Government planning policy, namely the Metropolitan Plan, allows for the creation of new centres in existing areas under certain circumstances. The proposed development is consistent with the centres policy elements of the Metropolitan Plan.</p>	Architectus

<sup>14</sup> Source: <http://www.westfield.com/corporate/property-portfolio/australia/mtdruitt.html> (December 2012)

<sup>15</sup> Source: <http://www.westfield.com/corporate/property-portfolio/australia/mtdruitt.html> (December 2012)

<sup>16</sup> Source: Shopping Centre News Big Guns (2011)

<sup>17</sup> Source: Blacktown Planning Strategy Economic and Employment Input, Hill PDA (2010)



Key Issues	Response	Response prepared by
<p><u>Contributions</u></p> <p>Westfield believes a number of items listed as "site specific public benefits" are not benefits that would be expected of a centre. Similarly, many works nearby appear to be works to mitigate the proposal.</p> <p>EIS fails to factor in net increase in traffic impacts in the Great Western Highway and Rooty Hill Road Intersections.</p> <p>The only significant public benefit is offsetting of threatened vegetation, but no detail on how this would occur.</p> <p>The proposal bypasses the contributions and VPA frameworks that would normally apply in a centre. Developers are being taxed to comply with a decision to invest in an existing/planned centre.</p>	<p><u>Hill PDA response:</u></p> <p>A Net Community Benefit Test (NCBT) was prepared by the Hill PDA and submitted to the Department for review. In considering the largely qualitative approach in the NCBT the Department favoured a more quantitative assessment and as a result Hill PDA prepared a Cost Benefit Analysis (CBA) which forms part of this planning proposal and supersedes the NCBT. The CBA which is now included as part of this Response to Submissions package indicates that the preferred option is the best performing based option based on the financial Key Performance Indicators. It also represents the least risk.</p> <p><u>Architectus response:</u></p> <p>It is anticipated that a Voluntary Planning Agreement will be required for the proposed development. Refer to <b>Section 4</b> of the Response to Submissions for discussion on Voluntary Planning Agreements and Section 94 contributions. This process will evaluate those works that only serve the development versus a broader public benefit.</p> <p>In relation to offsetting threatened vegetation, the EIS provides as a Statement of Commitment there will be a <i>Biodiversity Offset Strategy and Biobanking Agreement</i>. The Ecological Assessment accompanying the EIS and the Addendum to the Ecological Assessment at <b>Appendix 12</b> provides that the development will be offset by a biobanking site that is situated off-site at Chandos West. The vegetation on site will be rehabilitated and is likely to form a future biobanking site. Management of the site will be detailed in a Construction and Operation Environmental Management Plan.</p>	<p>Hill PDA</p> <p>Architectus</p>
Westfield strongly opposes the proposal.	Noted	

## Global Real Estate

**Table 13. Response to Submission from Global Real Estate**

Key Issues	Response	Response prepared by
Owners and manager of Westpoint Blacktown	Noted	-
The proposal fails to address centres planning policy.	The EIS, the Response to Submissions report, and the Supplementary Economic Report at <b>Appendix 5</b> address the centres planning policy that is contained in the Metropolitan Plan, the Draft Metropolitan Strategy, and the draft Centres Policy 2009.	Architectus
The approach to facilitating new centres is through the sub-regional strategic planning process, and codified in the Government's Guidelines for Preparation of Planning Proposals. As proposal is permissible with consent, it bypasses this strategic planning process.	<p>State Environmental Planning Policy (Western Sydney Parklands) 2009 allows for the proposed land uses on the site. As such, a planning proposal to rezone the land is not required or relevant.</p> <p>A Supplementary Report to the Economic Impact Assessment has been prepared by Hill PDA to address the formation of a new retail centre on the site in relation to the draft Centres Policy 2009. The Supplementary Report includes a Sequential Test, demonstrating that there is insufficient suitable, available or viable land to accommodate the quantum of bulky goods premises that is proposed for the Business Hub. The Supplementary Report also demonstrates that there is demand for bulky goods retail floorspace above what is provided in existing retail centres.</p>	Architectus
The application of the WSP SEPP bypasses the Blacktown DCP 2006. The DCP contains Blacktown's centres hierarchy. The proposal challenges the hierarchy and the new centre is only justified on the basis of retail turnover impacts.	<p>The Blacktown DCP 2006 does not apply to development to which the WSP SEPP applies. Nevertheless, the provisions of the DCP have been used to inform the site assessments in the Sequential Test and preparation of the Design Guidelines. Furthermore, the Response to Submissions report addresses the Blacktown Planning Strategy 2036, and the Blacktown Commercial Centre Analysis.</p> <p>The Metropolitan Plan for Sydney 2036 and the Draft Centres Policy 2009 allow for the creation of new centres where justified following demand and supply retail assessment. A Sequential Test has been included as part of the Supplementary Report and demonstrates that there are no suitable, available or viable sites in the locality which could accommodate the proposed</p>	Architectus

Key Issues	Response	Response prepared by
	development, even in a smaller form, if it is not permitted on this site. The strategic planning basis and justification for the project is discussed under <b>Section 3.1</b> of the Response to Submissions report, which includes an upfront summary of the strategic planning basis for the ECBH ( <b>Section 3.1.1</b> ), and later, a summary of the ensuing public benefits of the development ( <b>Section 3.1.19</b> ).	
It is not clear what is the Blacktown Commercial Centres Strategy 2012, and the EIS appears to be justifying the proposal on the basis of it.	<u>Hill PDA Response:</u>  WSPT was provided with a confidential extract of a commercial centres strategy and Blacktown Planning Strategy 2036 that were being prepared by Council (by Council officer) to Architectus by email on 19/07/2012. It is assumed that the centres strategy is the 2007 retail strategy that was adopted in 2011 by Council.  <u>Architectus Response:</u> The Blacktown Commercial Centre Analysis is addressed in Hill PDA's Supplementary Economic Report, and in the Response to Submissions report at <b>Section 3.1.10</b> .	Hill PDA  Architectus
Undue emphasis is on the WSP Plan of Management to justify the proposal.	The WSP Plan of Management is the strategic planning document for the parklands. In addition, justification of the proposal has been provided in the Response to Submissions in relation to the other planning framework, including the Metropolitan Plan, Draft Metropolitan Strategy, Draft Centres Policy, and other policy documents. These policies allow for the formation of a new centre on the site in relation to the public benefits ensuing from the proposal, which will outweigh the costs (refer to the Cost Benefit Analysis prepared by Hill PDA) and the fact there is insufficient land in other centres in the trade area to accommodate the proposed quantum of bulky goods floorspace (refer to the Sequential Test in the Hill PDA Supplementary Report at <b>Appendix 5</b> ). Furthermore, the report demonstrates that there is demand for the quantum of retail premises proposed.	Architectus
Metropolitan Planning Strategy includes as key action to develop the WSP as a major asset for Western Sydney and to improve recreation and to develop commercial uses. It is a big stretch for the scale of the proposal to be viewed as being "in conjunction with" the function and operation of the Parklands.	The proposal can accurately be viewed in conjunction with the operation of the parklands because the revenue from the business hub will allow for the ongoing function of the parklands. Furthermore, the business hubs will bring people into the area who may use the parklands, and vice versa. These commercial and business functions are allowed for in the Western Sydney Parklands Act 2006, the State Environmental Planning Policy (Western Sydney Parklands) 2009, and the Parklands Plan of Management, which refers to the development of business hubs in the parklands. The Metropolitan Plan, Draft Metropolitan Strategy, and the Draft Centres Policy 2009 also allows for the creation of new retail centres.	Architectus
The WSP Plan of Management requires that any development proposal is to be consistent with a range of matters including the plan of management for the parklands and any precinct plan for a precinct of the parklands. The Plan of Management (WSP PoM) defines 'business hub' as including commercial, retail, community support facilities and open space uses. The PoM also refers that up to 2% of the parklands can be for long term uses as Business Hubs. So there is no strategic land use planning requirement for proponent to have regard to the centres planning framework.	Noted. However the Plan of Management was prepared to have regard to the objectives of the Metropolitan Plan, which includes, the centres policy elements.	Architectus
The approach to identifying the location for business hubs is by a more qualitative stakeholder engagement process. A review of the Consultation Report with application does not provide conclusive view of appropriateness of the Hub in terms of location and form/function. The comment in the report that "Council does not support	The evaluation of sites within the parklands for accommodating the proposal that was contained in the consultation report has been updated by the Trust in respect of articulating the constraints and opportunities for each site. Refer to the updated document at <b>Appendix 9</b> .	Architectus

Key Issues	Response	Response prepared by
business hubs" is noted.		
The land uses envisaged for the precinct in the WSP Plan of Management are community facilities, local active recreation, local passive recreation, and cultural heritage facilities. There is therefore a misalignment.	<p>Section 6.2 of the Environmental Impact Statement responds to the criteria for business hubs and management principles for Rooty Hill Precinct in the Plan of Management.</p> <p>The Plan of Management 2020 provides that 2% of the parklands are to be identified for business hubs, but does not identify their locations. The Draft Supplement to the Plan of Management will identify the locations of the business hubs.</p> <p>The Parklands Plan of Management Land Use Framework Plan (Figure 3) shows the proposed broad land uses for respective areas of the parklands. It does not identify the site for "Sport and Active Recreation Hub", "Community and Passive Recreation Hub" or "Tourism Hub" which are shown on the Plan relating to other areas of the parklands.</p> <p>The proposed development will be consistent with the priorities for "Precinct 3 – Rooty Hill" in the Plan of Management because it will provide significant areas to dedicate for conservation and will rehabilitate these areas; will provide stormwater infrastructure that will benefit the broader catchment; will provide landscaping; and will provide for areas for recreation and play (children's playground at the 'village centre').</p> <p>Nevertheless, the parkland precincts and precinct management guidelines, as discussed above, are to be used as a guide only.</p>	Architectus
It appears that the proposal is justified primarily on economic sustainability.	<p>A Net Community Benefit Test (NCBT) was prepared by the Hill PDA and submitted to the Department for review. In considering the largely qualitative approach in the NCBT the Department favoured a more quantitative assessment and as a result Hill PDA prepared a Cost Benefit Analysis (CBA) which forms part of this planning proposal and supersedes the NCBT. The CBA which is now included as part of this Response to Submissions package indicates that the preferred option is the best performing based option based on the financial Key Performance Indicators. It also represents the least risk.</p> <p>The proposal is justified at <b>Section 3</b> of the Response to Submissions. A summary of the strategic planning basis for the proposed development is at <b>Section 3.1.1</b> and the public interest matters are at <b>Section 3.1.19</b></p>	Architectus
The absence of known tenants together with the lack of retail analysis to inform a strategic appraisal of the project against the existing and proposed centres hierarchy, means the proposal is speculative in nature.	The Economic Impact Assessment supporting the EIS, the Supplementary Report prepared by Hill PDA, and the Response to Submissions report, undertake a robust assessment of the proposal against the centres hierarchy. This includes preparation of a Sequential Test as advocated in the draft Centres Policy 2009 and a Cost Benefit Analysis.	Architectus