

Your ref: SSD 5175 Mod 2
File no: MC-12-1769

27 July 2017

Modification Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Emma Butcher

Dear Ms Butcher,

Project: SSD 5175 Mod 2 Eastern Creek Business Hub s96(2) modification request to amend the indicative concept plan, urban design guidelines and permitted uses

Re: Council comments for the further Response to Submissions

I refer to your correspondence dated 6 July 2017, providing us the opportunity to comment on Frasers Property's request to modify the Eastern Creek Business Hub and their further response to submissions.

We have undertaken a review of the additional information and maintain our concerns that the design of Beggs Road is not suitable and is not supported.

To ensure that a high standard of development is produced and that the development operates in a manner that will have no adverse impact on the surroundings, we request that the alignment of Beggs Road is revised as reiterated in Attachment A. It is noted that the items discussed in Attachment A were discussed with the Applicant on 18 July 2017.

If you would like to discuss this matter further, please contact Judith Portelli, Manager Development Assessment on 9839 6000.

Yours faithfully,



Judith Portelli

Manager Development Assessment

ATTACHMENT A

We request that the following items are fully addressed in the consideration of this modification application:

Planning Matters
The reorientation of the Lot 2 loading areas results in potential amenity impacts on the two adjoining residential properties to the north-west of the subject site. The proposal should be supported by a detailed plan of management for the loading areas and Beggs Road including mitigation measures to be implemented and improved as required.
Drainage and Engineering
Condition B12 Contamination is required to be amended to reflect the following requirements: Future development applications for the construction of buildings shall include a stormwater management plan in accordance with the Water Cycle Management Strategy Report Incorporating Water Sensitive Urban Design Techniques prepared by J. Wyndham Prince dated March 2013 and Council's Engineering Guide for Development 2005 and part J of DCP 2015. The Stormwater Management Plan is to include a requirement that 80% of non-potable demand be met through an alternate water source. Where this 80% cannot be achieved through roof rainwater alone the treated underdrain flow from the bioretention system is to be used for landscape watering and/or other uses subject to appropriate treatment.
Traffic Management
The following comments are provided by Council's Access and Transport Management section: 1. We will accept loading docks access to the proposed development off Beggs Road provided: a. Beggs Road is widened to a local industrial road standard. b. A turning head to industrial standard is constructed at the end of the Beggs Road, wholly within the road reserve. c. Beggs Road is realigned at a right angle (90 degrees) where it meets with Rooty Hill Road South. 2. The realignment of Beggs Road may also require a deceleration lane on Rooty Hill Road South for heavy vehicles to turn into Beggs Road from kerb side lane. 3. As shown in the Concept Master Plan Drawing No. SK-20.3 dated 3 July 2017 pedestrians will be able to cross Rooty Hill Road South virtually anywhere between Cable Place and Penfold Street. A pedestrian fence along Rooty Hill Road South could prevent pedestrians crossing anywhere along this road. This safety measure is recommended to be considered.

4. Car parking rates are required to be determined based on Council's Development Control Plan 2015 rather than RMS Guide to Traffic Generating Development.

These requirements should be fully reflected in this Concept Proposal and Stage 1 Development Application, SSD 5175 Mod 2, including updating the Design Guidelines.

Environmental Health

The following comment is provided by Council's Environmental Health Officer:

The Response to Submissions is accompanied by an Acoustic Assessment which states only that the Lot 2 loading dock will comply with the relevant noise level criteria. The Submission also states that a 2.1m acoustic wall will attenuate the acoustic impacts of the Lot 2 loading bay and achieve the sleep disturbance criteria.

We are unable to undertake an assessment of this statement in the absence of a full acoustic assessment, which the Applicant states will be provided for the future detailed Development Application. In particular the effectiveness of the acoustic wall given its distance from the loading dock. We do not consider that the conceptual acoustic mitigation measures will be sufficient.