

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

12 October 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 4 October 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 dated 26 September 2017.

We have undertaken a review of the additional information and maintain our concerns that the current design of the proposed traffic and parking arrangements are not suitable and are 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 application is revised as reiterated in Attachment A.

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 & Environmental Health Matters
We note that SSD 8588 for the detailed construction of a retail centre has now been lodged and will include a detailed assessment of the loading bay and potential acoustic impacts on the two adjoining residential properties to the north-west of the subject site. We maintain that the relationship of this level of activity to residential dwellings is not suitable, and a detailed assessment will also be undertaken in SSD 8588.
Drainage and Engineering
We maintain that it is suitable for Condition B12 Contamination to be updated to reflect the current requirements as follows: 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. Council's local industrial road is 20.5 m wide which includes a 13.5 m wide carriageway and footway 3.5 m wide on each side. The proposed 12 m wide carriageway does not comply with the Blacktown Development Control Plan (DCP) requirement and is not supported. 2. A turning head in the form of a cul-de-sac with a carriageway radius of 13.5 m is required at the end of the Beggs Road. A three point turn by a truck on a public road is not supported. 3. Our preference is that the Beggs Road be realigned at right angle (90 degrees) where it meets with Rooty Hill Road South. 4. We note that RMS require a median strip to restrict access to Beggs Road as left-in and left-out. We support this initiative. 5. We would only accept RMS parking rates where no parking rates are available for a proposed development in Council's DCP. As Council has parking rates in its

DCP for this type of development, Council's parking rates should be used to determine parking numbers, not RMS rates. The car parking rate is not supported.

6. Whilst we acknowledged that a safe crossing point will be available at the Cable Place traffic signals, a pedestrian can cross Rooty Hill Road South north of Cable Place as well. This could create a safety hazard for pedestrians due to very high traffic volumes along Rooty Hill Road South. Pedestrians will be benefitted with a pedestrian fence along Rooty Hill Road South as it would force pedestrians to walk up to Cable Place to cross the road safely thus improve pedestrian safety. We believe this safety measure is worth considering.

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