

2 March 2018

16258

Carolyn McNally  
Secretary  
Department of Planning & Environment  
23-33 Bridge Street  
Sydney NSW 2000

Attn: Brian Kirk – Planner, Key Sites Assessments

Dear Brian

**RE: Response to Request for Information for SSD 8588  
Eastern Creek Business Hub (Lot 2)**

Ethos Urban has prepared this letter on behalf of Frasers Property Australia in response to your letter dated 7 December 2017, and the associated submissions received during the exhibition period of SSD 8588 and SSD 5175 MOD 3, relating to Lot 2 of the Eastern Creek Business Hub development.

The project team has considered all comments raised in the submissions, and by the Department, and the following response has been formulated to assist with the assessment of SSD 8588. We note that a separate response to MOD 3 (SSD 5175) has already been provided to the Department on 6 February 2018.

This response to SSD 8588 is accompanied by the following supporting documents:

- Materials and Finishes Package (**Attachment A**);
- Additional Perspectives (**Attachment B**);
- Architectural Design Statement (**Attachment C**);
- Updated Acoustic Report (**Attachment D**);
- Transport Assessment Addendum (**Attachment E**);
- Updated Site Plan (**Attachment F**);
- Outdoor Lighting Details (**Attachment G**);
- Additional Section Plans (**Attachment H**);
- Site Audit Statement/Report (**Attachment I**);
- Landscape Plan (**Attachment J**); and
- Correspondence from Mount Druitt Police (**Attachment K**).

The following table provides a response to Schedules 1 and 2 of the Department's request for information letter.

**Table 1 RFI Response Table**

DPE Comment	Response
<b>Schedule 1 – Key Issues</b>	
<b>Visual Impact/Streetscape</b>	
<p>1. The following additional information has been requested:</p> <ul style="list-style-type: none"> <li>• Details of the location, type, material and finishes of the proposed acoustic wall and landscape treatment along RHRS.</li> <li>• Details of the materials and finishes for the shopping centre building.</li> <li>• Images at key locations showing building and material components and finishes and supported by an architectural design statement.</li> <li>• Additional aerial 3D perspectives showing the interface along RHRS, including the loading dock and the acoustic wall and landscape setback.</li> </ul>	<p>I2C has prepared Materials and Finishes Package (refer to <b>Attachment A</b>) that provides additional details of the location, type, materials and finishes of the proposed wall along Rooty Hill Road South and the retail centre building. This is accompanied by additional aerial perspectives (<b>Attachment B</b>) showing the interface along Rooty Hill Road South and an Architectural Design Statement (<b>Attachment C</b>) outlining the rationale behind the proposed building materials, lighting and screening.</p>
<b>Acoustic Impact</b>	
<p>2. Provide further assessment and analysis of the potential acoustic impact to neighbouring residential areas and the future child care facility resulting from the use of the car park and internal traffic movements.</p>	<p>An updated Acoustic Report is included at <b>Attachment D</b> to provide further assessment of the potential acoustic impacts to neighbouring residential areas. The assessment found that noise associated with the use of the car park and internal traffic movements would not unduly affect residences to the north west of the site due to the mitigation measures proposed for the loading dock. The residential area on the western side of Rooty Hill Road South will also not be affected by the use of the car park as the noise from the existing traffic volumes on Rooty Hill Road South are greater than the future noise levels generated from the use of the car park.</p> <p>The child care centre is no longer proposed as part of Stage 1 of the Business Hub and will instead be included in a future application for Stage 2. The acoustic impacts associated with the child care centre will therefore be addressed as part of a subsequent application.</p>
<p>3. Provide additional information to demonstrate that the effectiveness of the acoustic wall to mitigate noise impacts to the residential properties along RHRS, particularly given the distance and change in levels to the loading area.</p>	<p>Section 6.3 of the Updated Acoustic Report (<b>Attachment D</b>) provides an assessment of the ability of the proposed screening along the western boundary of the site to protect the acoustic amenity of residential properties on the opposite side of RHRS. The report notes that a 2.2m screen constructed from a solid material is required along the north western section of the site boundary to mitigate potential acoustic impacts of the loading dock. Acoustic Logic has reviewed the proposed masonry/lapped and capped timber design of the screen and confirm that this will be acoustically acceptable.</p>
<p>4. Provide the details of the location, height and materiality of any acoustic screen between the loading area and the adjoining properties fronting Beggs Road to ensure a satisfactory acoustic and amenity outcome for the adjoining properties.</p>	<p>Additional details of the proposed screening are provided on the Section Plans at <b>Attachment H</b> and within the Updated Acoustic Report at <b>Attachment D</b>. The proposed screen to the loading dock will include a 2.1m high, precast concrete retaining wall with landscaping. The acoustic report notes that whilst an acoustic wall is not required at this location to meet the relevant noise criteria (due to the barrier effect provided by the change in ground level), the proposed screen will further reduce noise levels and protect the acoustic amenity of the neighbours to the north.</p>
<p>5. Clarify the recommendations of the Acoustic and Vibration Report.</p>	<p>An updated Acoustic Report is included at <b>Attachment D</b> which provides clarity around the recommended acoustic and</p>

DPE Comment	Response
	<p>vibration mitigation measures for the project and rectifies errors contained within the original report.</p> <p>It is noted that trucks/vehicles associated with the loading/unloading activities will not be permitted to park outside of the loading dock or in surrounding local streets.</p>
<b>Traffic Impact</b>	
<p>6. Provide an addendum traffic assessment addressing Condition B7 of the Concept Approval and include evidence to confirm that the proposed Stage 1 development will not materially change the traffic impacts on the surrounding road network compared to the Concept Approval.</p>	<p>CBRK has provided an addendum letter to their traffic assessment in response to comments made by Council, RMS and the Department (refer to <b>Attachment E</b>). Detailed traffic modelling was undertaken as part of the original Concept Plan and as the scale of development for the Stage 1 detailed design is consistent with that approved under the Concept Plan, repeating the modelling is unnecessary. In accordance with Condition B7 of the consent, the traffic assessment demonstrates that the detailed design of the development provides sufficient loading/unloading, access and car parking.</p>
<b>Beggs Road</b>	
<p>7. Consideration is to be given to the concerns raised by Council regarding the design of Beggs Road, to including options to provide a 13.5 metre wide carriageway and a 3.5 metre wide footpath/s, including compliance with any conditions within the future determination of SSD 5175 Modification 2.</p>	<p>CBRK has reviewed Council's concerns regarding the design of Beggs Road and has addressed these in a letter provided at <b>Attachment E</b>. The design of Beggs Road includes a 13.5m wide carriageway and 3.5m wide footpath as requested by Council. A 13.5m turning head, however, is not achievable within the existing road corridor and this cannot be widened due to constraints such as the adjacent Cumberland Plain Woodlands. Notwithstanding, adequate turning area for a 12.5m long truck has been provided to allow for turning vehicles. It is also noted that Council raised this matter as part of MOD 2 to SSD 5175. Further information was provided to justify the proposed design and it is our understanding that this was determined to be satisfactory.</p>
<b>Child Care Centre</b>	
<p>8. If the child care centre is no longer proposed, please provide updated plans including details on any future use of this portion of the site, which would be subject to separate approval.</p>	<p>The child care centre is no longer proposed in this location and updated plans are provided at <b>Attachment F</b>. At this stage the future use of this area has not been determined, however it may be used for a car wash facility subject to practicability. Therefore, the future use of this area will be subject to a future DA.</p>
<b>Outdoor Lighting</b>	
<p>9. Provide details of all other outdoor lighting in accordance with Condition B19 of the Concept Plan Approval, with particular regard to the car park and loading areas and an assessment of potential light spill impacts to neighbouring residential areas.</p>	<p>Additional details on the proposed outdoor lighting for the site is provided at <b>Attachment G</b>. This includes a product information sheet for the proposed lighting, a Lux Plot Plan and an Obtrusive Light Compliance Report. This information confirms that the proposed lighting scheme complies with the applicable Australian Standards and maximum illumination levels.</p>
<b>Schedule 2 – Additional Information</b>	
<ul style="list-style-type: none"> <li>Provide section plans through the adjoining residential lot boundaries on Beggs Road and the loading dock including acoustic treatment, landscaping, driveways and the shopping centre building.</li> </ul>	<p>I2c has prepared additional section plans and perspectives (refer to <b>Attachment H</b>) showing the design of the loading dock in relation to the neighbouring residential lots.</p>

DPE Comment	Response
<ul style="list-style-type: none"> <li>Having regard to Condition B10 of the Concept Approval provide the validation report and site audit statement to demonstrate the site is suitable for development.</li> </ul>	<p>Remediation of the site has occurred, and a copy of the Site Audit Report and Site Audit Statement are provided at <b>Attachment I</b>. These documents conclude that the site has been remediated and is suitable for the proposed land uses.</p>
<ul style="list-style-type: none"> <li>Confirm whether approval is sought for any events.</li> </ul>	<p>The proposal does not seek consent for any events. If events requiring development consent are proposed at the site this would be subject to separate future approval.</p>
<ul style="list-style-type: none"> <li>Provide detailed landscaping plans including confirmation of trees to be removed.</li> </ul>	<p>A tree removal plan is provided at <b>Attachment J</b>. It is noted that the site will be cleared of all vegetation within the Lot 2 boundary and replaced with new landscaping, including the planting of 175 trees, in accordance with the submitted plans. The conservation areas to the north of the site will be protected and the Biodiversity Offset Strategy implemented as established by the Concept Plan.</p>
<ul style="list-style-type: none"> <li>Provide details of the VPA, including the delivery of infrastructure and timing of works.</li> </ul>	<p>Reference to a VPA in the EIS submitted with the application was incorrect. The original Concept Plan application initially included reference to a VPA, however it was later agreed between Council and the Western Sydney Parklands that a VPA was not appropriate for the development. All necessary infrastructure works are required to be delivered in accordance with the conditions of consent.</p>
<ul style="list-style-type: none"> <li>Provide a response to Council's concerns about the safety and security issues association with any future liquor store and ATM(s), including details of any consultation with NSW Police.</li> </ul>	<p>Council requested that the applicant consult with NSW Local Police regarding the proposed liquor store and ATM room. A copy of the development proposal and request for comment was provided to Mount Druitt Police who provided a number of suggestions relating to CPTED (refer to <b>Attachment K</b>).</p> <p>The following comments were made in relation to the ATM's:</p> <ul style="list-style-type: none"> <li><i>ATM's to be located within the complex within a central area with the intent of maximising opportunities for natural surveillance;</i></li> <li><i>Any ATM that potentially can be accessed outside normal business hours is recommended to be well lit incorporating vandal resistance lighting; and</i></li> <li><i>It is recommended that the ATM should not be recessed into a wall or similar so users can observe approaching people, and with reflective material so users can observe people approaching from behind.</i></li> </ul> <p>The current proposal includes a secure room adjacent to the centre's amenities which is identified as being used for ATM's. The detailed design of this room can incorporate additional security measures, such as CCTV, vandal resistance lighting and reflective materials to enhance the security for its users. Frasers would be happy to accept an appropriately worded condition of consent to this effect.</p> <p>No issues were raised by Mount Druitt Police with the proposed liquor store. It is noted that liquor stores accompanying supermarkets are a common feature of such retail centres and the following initiatives will be implemented to mitigate any safety concerns:</p> <ul style="list-style-type: none"> <li>The liquor retailer will need to obtain all relevant licences and abide by the applicable regulations pertaining to the sale of packed liquor;</li> </ul>

DPE Comment	Response
	<ul style="list-style-type: none"><li>• CCTV will be installed throughout the development and will be focused on the liquor store and ATMs;</li><li>• The liquor store is located within a well lit and secure location that allows for causal surveillance (particularly given its location adjacent a 24 hour gym);</li><li>• A 24 hour on call security service will operate;</li><li>• An Operational Management Plan for the liquor store was lodged with the application and will be refined by the retailer prior to operating. This includes compliance with a strict 'house policy' developed by the supermarket operator with extensive experience in liquor retailing.</li></ul>

We trust that the information provided satisfies the requirements of the additional information request. We look forward to the Department progressing the assessment of the application and to receiving a set of draft conditions for consideration in due course.

Should you have any further queries about this matter, please do not hesitate to contact me on 9409 4953 or [cforrester@ethosurban.com](mailto:cforrester@ethosurban.com).

Yours sincerely,



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