



Your ref: SSD 10457  
File no: MC-20-00003

3 March 2021

NSW Department of Planning, Industry and Environment  
GPO Box 39  
SYDNEY NSW 2001

Recipient Delivery [emily.dickson@planning.nsw.gov.au](mailto:emily.dickson@planning.nsw.gov.au)

**Attention: Emily Dickson**

Dear Ms Dickson


**SSD 10457- Eastern Creek Retail Outlet - Stage 3**

Thank you for your correspondence dated 4 February 2021 requesting our advice, comments and recommended conditions of consent for Eastern Creek Factory (DFO) Retail Outlet - Stage 3 which is a State Significant Development proposal under section 4.36 of the *Environmental Planning and Assessment Act 1979*.

The Environmental Impact Statement and supporting documentation have been reviewed by our officers and we have identified a range of issues that have not been adequately addressed by the applicant. These are listed in **Attachment A** to this letter. On this basis we object to the proposal until these matters are addressed.

If you would like to discuss this matter further, please contact Judith Portelli, our Manager Development Assessment, on 9839 6228.

Yours faithfully

  
Glennys James PSM  
Director Planning and Development

**Connect - Create - Celebrate**

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All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

## Blacktown City Council submission to SSD 10457- Eastern Creek Retail Outlet - Stage 3

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### 1. Planning comments

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#### a. Matters to be addressed:

- There is little mention of the existing “bulky goods/homemaker” type centres in the Blacktown LGA which could be impacted by a DFO.
- The tables and some discussion that refers to retail facilities, e.g. Table 3.2, do not appear to include floorspace other than “majors”, which could affect the assessment of any potential impact. For example, Kmart is not included in items listed under “Westpoint Blacktown”. To adequately assess impact, the list should refer to the “centres” not “retail facilities”. Additionally, there is little logic to the structure of that particular table given it ignores the hierarchy of centres as detailed in the Metropolis of Three Cities and the District Plans, although this is possibly because it refers to “retail facilities” and not “centres”.

- The comment on page 28 about Mount Druitt is an assumption only:

*It has been noted that the \$1.49 billion Mt. Druitt CBD revamp has recently been approved by the State Government. The project is planned to deliver 2,800 new apartments, as well as a mix of cafes, restaurants, other retail and commercial uses. This revitalisation is unlikely to bear a strong competitive influence on the factory outlet centre at Eastern Creek Quarter, as it will likely have a food & beverage focus. Any competitive fashion tenants are likely to be provided more ad hoc, without a critical mass or scale to have a competitive bearing on the subject centre.*

- A “revamp” has not been approved by the State Government – it was the Mount Druitt Planning Proposal and at this stage the composition and timing of future development is unknown as planning controls only have changed and no substantive DAs have been approved. Thus it is unknown whether the “revamp” would have a competitive influence on the EC Quarter.

- b. Given that there is no existing DFO in the Blacktown LGA, the development may have little direct impact on existing centres and bulky goods/homemaker precincts, however there is still potential to impact as local trade may be lost when people visiting the ECBH/EC Quarter shop for day to day items rather than go to a nearby centre. Additionally, due to various assumptions made and the lack of full detail on retailing levels in existing centres, it is not clear how a detailed assessment of any potential impact could be made.

## 2. Development Engineering comments

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### a. Matters to be addressed:

- The Civil Engineering plans prepared by Henry and Hymas need to be amended to include the external works that are identified in the Colston Budd Traffic Report. In particular the works identified in Section 2.7 for the reconstruction of Church Street and signalisation of the Church Street and Rooty Hill Road South intersection.

## 3. Open Space comments

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### a. Matters to be addressed:

- Our tree management section has reviewed the Arboricultural Impact Assessment (AIA) and has indicated that removing 147 trees is of significant concern. The report does not advise specifically how these trees will be impacted (only affected by the proposed development). The trees within the proposed Factory outlet building and carpark footprints are evident, and there will be 100% impact/encroachment into the Tree Protection and Structural Root Zones. The trees located within the landscaping area indicated on drawing No. SK23.1 are potentially able to be retained despite the AIA indicating High Impact encroachment.
- No site-specific landscape Plan has been presented to justify the High Impact on trees in these areas. The Landscape Concept by Arcadia is not specific enough to indicate soil level grade changes or infrastructure that is to be included in the area.
- Trees located within the Landscape areas (10 m and 20 m landscape setback and area 12 indicated in drawing No. SK23.1) which have High and Medium Retention Values, and trees outside of the development area (trees 63-68), are to be retained and protected in line with Australian Standard AS4970 2009 Protection of trees on development sites. A specific Tree Protection Plan is to be submitted to Council for the specific protection of these trees, incorporating advice as indicated in section 4 of the AIA.
- A review of these trees can be submitted should the applicant provide specific details as to why they are required to be removed. Detailed information about the encroachment in the TPZ and SRZ should be presented along with a site-specific landscape plan for the area.