

ASSESSMENT REPORT

Section 96(1A) Modification Dexus Quarry West Estate (SSD 6801 MOD 5) Amendments to Precincts C and D

1. INTRODUCTION

This report assesses a modification application by the Dexus Quarry West Subtrust (the Applicant) to the Dexus QuarryWEST Estate (SSD 6801). The application has been lodged pursuant to section 96(1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

2. BACKGROUND

The Applicant manages an industrial estate near the Prospect Highway, Pemulwuy. The site is located partly in the Cumberland (formerly Holroyd) and Blacktown local government areas (LGA), approximately 35 km west of the Sydney central business district (see **Figure 1**).

The site is located wholly within the former Prospect Quarry and the Greystanes Southern Employment Lands (Greystanes SEL) which is a State significant precinct under *State Environmental Planning Policy (State Significant Precincts) 2005* (SSD SEPP) and permits business park and light industrial uses on-site.

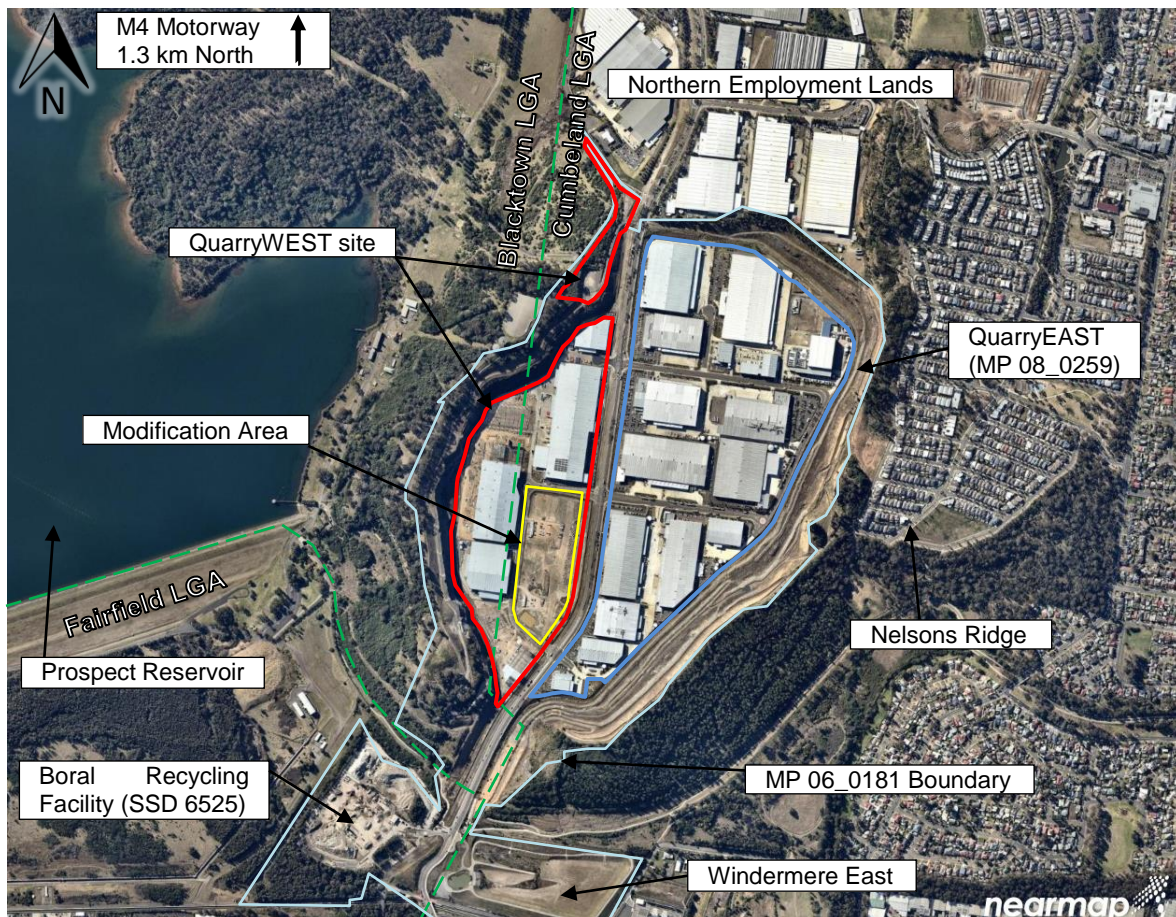


Figure 1: Site and Modification Location

Surrounding land uses include:

- the Greystanes Northern Employment Lands (NEL) and the M4 Motorway immediately to the north
- the DEXUS QuarryEAST Estate immediately to the east (MP 08_0259)
- the suburb of Nelsons Ridge further to the east, which is separated from the site by Ridgeline Reserve
- Boral's construction materials recycling facility (SSD 6525) to the south in the Fairfield LGA, which is currently operating
- the industrial/manufacturing area of Wetherill Park, Fairfield further to the south
- Prospect Reservoir and Eastern Creek to the west.

The Applicant has lodged the modification application to amend the layout of Precincts C and D of the estate to replace the approved retail and food and drink premises areas with a warehouse, amend architectural treatments and make minor adjustments to the precinct layouts and access points.

3. APPROVAL HISTORY

On 20 July 2007, the then Minister for Planning granted concurrent Concept Plan and Project Approval for MP 06_0181 for the use and development of light industrial and business park uses within the Greystanes SEL under Part 3A of the EP&A Act.

On 20 October 2016, the Acting Executive Director, Key Sites and Industry Assessments, as delegate of the Minister for Planning, granted development consent for the Dexus QuarryWEST project (SSD 6801) (see **Figure 2**). The development consent permitted:

- subdivision of the site into eight lots
- construction of internal roads and site services
- bulk and detailed earthworks
- construction and use of facilities in two 'zones' including:
 - a logistics campus and service centre for industrial (warehousing and distribution centres) and business (retail) facilities in 'Zone 1'
 - associated industrial facilities (warehousing and distribution centres) in 'Zone 2'
- a total gross floor area (GFA) across the site of approximately 127,765 m²
- operations on a 24 hour, seven days a week basis.



Figure 2: QuarryWEST Layout as Originally Approved

SSD 6801 has been modified four times. The currently approved layout is show in **Figure 3**.

On 16 June 2016, SSD 6801 MOD 1 was approved under delegation to modify the areas of Precincts A, B and E, the lot boundaries within the site, the size of warehouses A2, B1 and B2, ancillary offices and retail spaces.

On 20 September 2016, SSD 6801 MOD 2 was approved under delegation to split warehouses B2 and B3 in Precinct B, Zone 1 and amend the warehouse, office, parking and access layouts.

On 25 April 2017, SSD 6801 MOD 3 was approved under delegation to amend the subdivision layout of Lot B, the access circulation and layout of Precinct B, amend the sizes of warehouses B2 and B3 and increase the height of warehouse B2 to accommodate Symbion Health as a tenant.

On 10 August 2017, SSD 6801 MOD 4 was approved under delegation to amend the subdivision layout of Lot A, amend the layouts of warehouses A1 and A2, add trade related hardware/bulky goods and manufacturing/light industry uses in Precinct A.

To date the Applicant has constructed or commenced construction of:

- internal roads including Basalt Road, Dolerite Way and Charley Close cul-de-sac, earthworks, infrastructure and services
- warehouse buildings in:
 - Precinct E: warehouses E1 to E4
 - Precinct B: warehouses B1 to B3
 - Precinct A: warehouses A1 and A2.

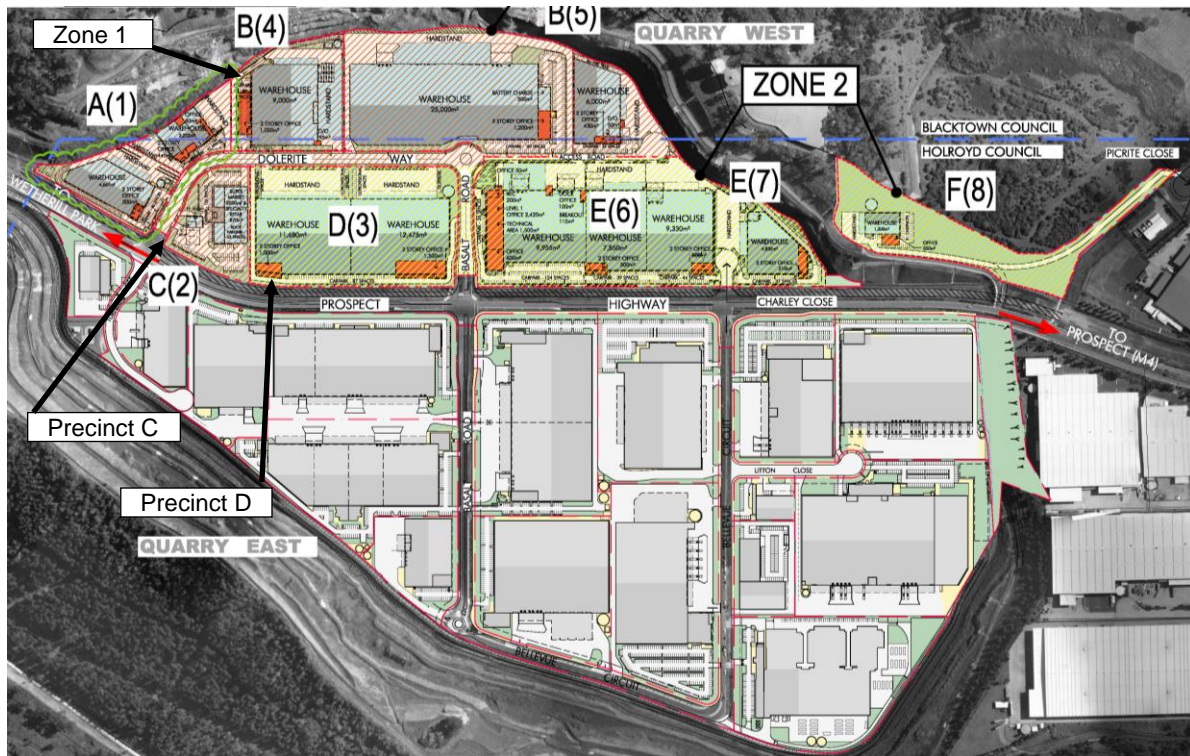


Figure 3: QuarryWEST Layout as Currently Approved

4. PROPOSED MODIFICATION

The Applicant has lodged a modification application under section 96(1A) of the EP&A Act to modify the QuarryWEST development to facilitate the development for Precincts C and D of the site for future end users that are yet to be identified. The modification is described in full in the Statement of Environmental Effects (SEE) included in **Appendix B**. The approved layout of Precincts C and D are shown in **Figure 4**. The proposed layouts of these areas are shown in **Figure 5**. The elevations of the additional and modified warehouses in Precincts C and D are shown in **Figure 6** and **Figure 7**.

The Applicant has advised it has been unable to secure a potential tenant for the retail and food and drink areas and considers there is a lack of demand for these end uses within the estate now and into

the future. On this basis, the Applicant is seeking to develop Precinct C of the estate for warehousing and distribution uses, consistent with the dominant use within the QuarryWEST Estate.

The Applicant has provided a detailed area breakdown of the approved and proposed changes. The relevant areas to this modification are shown in **Table 1**. The proposed modifications are located on land zoned B7 – Business Park under the SSP SEPP and would:

- change the use on Precinct C from retail to warehouse and distribution
- relocate interpretative heritage items consisting of a jaw crusher and select rocks to accommodate warehouse C (see **Figure 5**)
- amend the layouts of Precincts C and D to:
 - remove the retail premises (supermarket, specialty retail, fast food outlet and petrol station) in Precinct C and replace it with a warehouse (warehouse C)
 - amend the footprint and layout of warehouses D1 and D2 in Precinct D
 - amend the architectural treatments of warehouses in Precinct D to accommodate the new warehouse in Precinct C
 - increase the total floor area of the overall estate, associated with proposed warehouse C
 - make minor changes to access points, car parking and circulation areas.

The only building on-site is the 17.4 m high warehouse B2 in the IN2 zone, which was modified under SSD 6801 MOD 3.

Table 1: Relevant Quantitative Changes - Approved Development as Modified versus Proposed Modifications

Areas/Measures	Development as Modified and As Built	Proposed	Change (+/-) (%)
Site Area (m ²)	242,397	242,397	No Change
Warehousing (m ²)	104,744	111,109	+6,365 (6.08 %)
Retail (m ²)	2,870	0	-2,870 (-100 %)
Food and Drink Premises (m ²)	350	0	-350 (-100 %)
Office (m ²)	11,410	11,810	+400 (+3.51 %)
Total Building Area (m ²)	121,186	124,731	+3,545 (+2.93 %)
Awning Areas (m ²)	15,144	18,137	+2,993 (+19.76 %)
Hardstand (m ²)	78,896	77,527	-1,369 (-1.74 %)
Landscaping (m ²)	40,834	39,375	-1,459 (-3.57 %)
Building Height (m)	8-17.4	8-17.4	No Change
Site Cover incl. awning (%)	54	57	+3 (+5.56 %)
Floor Space Ratio (%)	50	51	+1 %
Car Spaces Required (No.)	847	691	-156 (-18.42 %)
Car Spaces Proposed (No.)	995	849	-146 (-14.67 %)

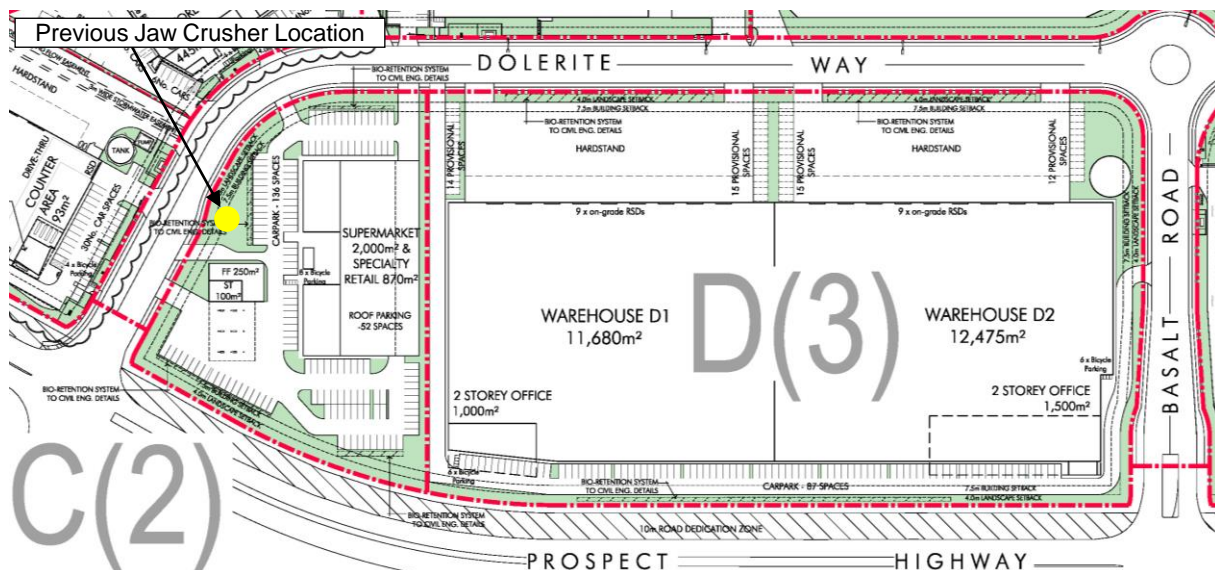


Figure 4: Approved Layout of Precinct C and D

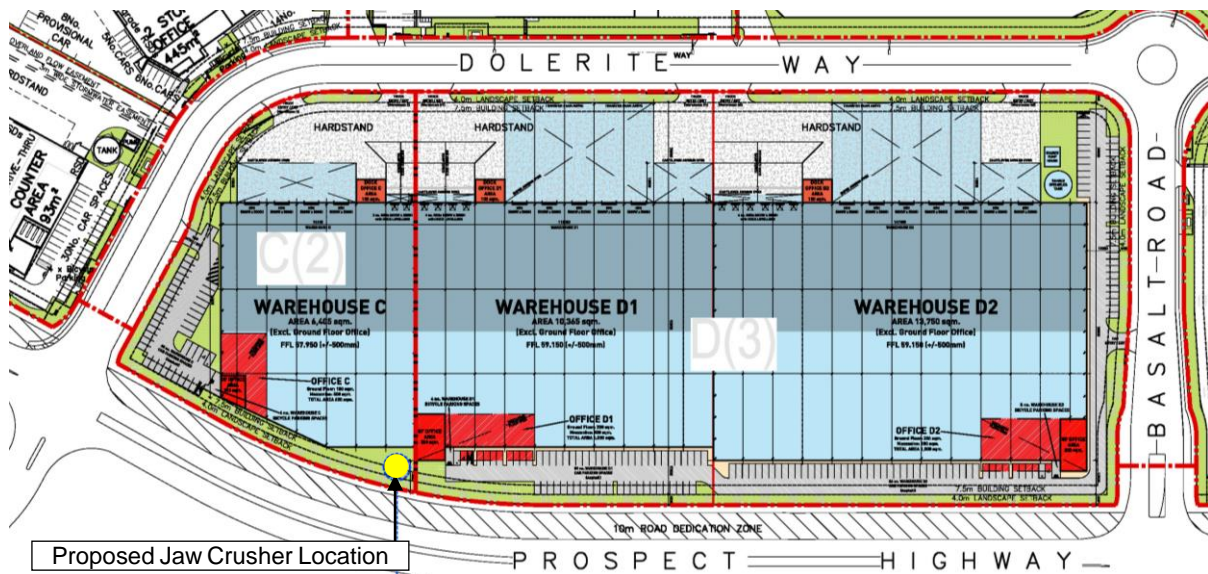


Figure 5: Proposed Layout of Precinct C and D

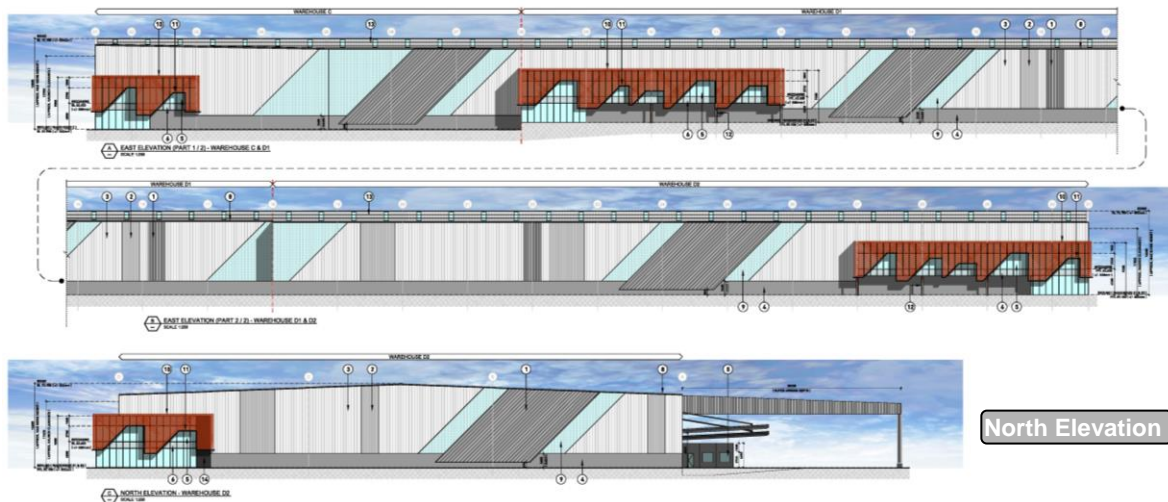


Figure 6: Elevations of Precincts C and D – North and East



Figure 7: Elevations of Precincts C and D – South and West

5. STATUTORY CONTEXT

5.1 Consent Authority

The Minister for Planning is the consent authority for the application. Under the Minister's delegation of 11 October 2017, the Director, Industry Assessments, may determine the application under delegation as:

- the relevant local council has not made an objection
- a political disclosure statement has not been made
- there are no public submissions in the nature of objections.

5.2 Section 96(1A)

The Department has reviewed the scope of the modification application and is satisfied that the proposed modification would result in minimal environmental impacts, and relates to substantially the same development as the original development consent on the basis that:

- the primary function and purpose of the approved project would not change as a result of the proposed modification, and would support the predominant use on-site
- no significant changes to the overall site layout are proposed
- the modification is of a scale that warrants the use of section 96(1A) of the EP&A Act
- any potential environmental impacts would be minimal and appropriately managed through the existing or modified conditions of consent.

Therefore, the Department is satisfied the proposed modification is within the scope of section 96(1A) of the EP&A Act and does not constitute a new development application. Accordingly, the Department considers that the application should be assessed and determined under section 96(1A) of the EP&A Act rather than requiring a new development application to be lodged.

6. CONSULTATION

Clause 117(3B) of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) specifies that the notification requirements of the EP&A Regulation does not apply to State significant development. Accordingly, the application was not notified or advertised, however, it was made publicly available on the Department's website from 14 November 2017, and was referred to Blacktown Council, Cumberland Council, Roads and Maritime Services (RMS) and the Heritage division of the Office of Environment and Heritage for comment.

Cumberland City Council (Council) did not object and raised no issues and provided no recommended conditions.

Blacktown City Council did not object and raised no issues and provided no recommended conditions.

The **Heritage Division** did not object to the modification and noted the proposed area is a highly visibly part of the estate.

No comments were received from the RMS.

7. ASSESSMENT

The Department has assessed the merits of the proposed modification. During this assessment, the Department has considered the:

- SEE and RTS provided to support the proposed modification (see **Appendix B**)
- assessment report for the original development application and subsequent modification application(s)
- submissions from the public, State government authorities and Council (**Appendix C**)
- relevant environmental planning instruments, policies and guidelines
- requirements of the EP&A Act, including the objects of the EP&A Act.

The Department's assessment of other issues is provided in **Table 2**.

7.1 Other Issues

The Department's assessment of issues of the modification application is provided in **Table 2**.

Table 2: Assessment of Other Issues

Issue	Assessment	Recommendation
SSP SEPP Compliance	<ul style="list-style-type: none"> The SSP SEPP includes key development standards for the site relating to building height, GFA, floor space ratio (FSR), car parking, design excellence and public utility infrastructure. The Applicant provided a detailed SSP SEPP compliance table with the SEE. The compliance table confirms the proposed modifications would comply with the SSP SEPP development standards, including the zoning of the site, notwithstanding departures approved under the original SSD application and subsequent modifications. The Department has assessed the proposal against the SSP SEPP development standards (see Table 3 at Appendix D). The Department's assessment concludes the proposed amendments to building locations, design, size and car parking provision are acceptable and the development would continue to comply with the SSP SEPP development standards. 	<ul style="list-style-type: none"> N/A
Consistency with Concept Plan	<ul style="list-style-type: none"> The Concept Plan includes key requirements and development controls for the site. The Applicant has provided a detailed Concept Plan compliance table with the SEE which confirms the development, as proposed to be modified, is generally consistent with the Concept Plan. The Department has assessed the consistency of the modification application with the Concept Plan (see Table 4 in Appendix D) and notes the modifications to Precinct A are minor in nature and do not impact on the acceptability of the development as modified. The Department concludes the development will continue to be consistent with the Concept Plan and no modifications to that approval are required. 	<ul style="list-style-type: none"> N/A
Design Excellence	<ul style="list-style-type: none"> The modification includes alterations to the façade design of warehouses D1 and D2 and seeks to extend the revised design to proposed warehouse C (see Figure 6 and Figure 7). The revised treatments incorporate perforated metal screening along office elevations with a reciprocated orientation to 'bookend' the length of the warehouses when viewed from the street. The design also includes metal sheeting in a recessive colour palate and translucent polycarbonate wall sheeting for façade articulation. The Department considers the proposed amendments change the overall design of the warehouse elevations, however maintain a high standard of architectural quality of the warehouse buildings in precincts C and D, which does not compromise the objective of design excellence. The Department's assessment concludes the proposed modification would ensure the development maintains a high standard of design and concludes it will continue to achieve design excellence. 	<ul style="list-style-type: none"> include updated and new plans in the development consent.
Traffic, Access and Car Parking	<ul style="list-style-type: none"> The proposed modifications would remove the 3,220 m² of retail and food and drink premises GFA and increase the amount of warehousing GFA from 104,744 m² to 111,109 m² (an increase of 6,365 m²). Car parking, crossovers and circulation areas area also need to be relocated to facilitate the proposed layout. <p><u>Traffic</u></p> <ul style="list-style-type: none"> The Applicant's Traffic Impact Assessment (TIA) concluded the removal of the retail component would significantly reduce traffic generation in the estate. When applying the rates under the RMS Guide to Traffic Generating Development, traffic volumes would fall from: <ul style="list-style-type: none"> 860 trips per hour to 653 trips per hour in the AM peak 1,136 tips to 660 trips in the PM peak. The original SSD 6801 assessment concluded the Dolerite Way/Turnbull Close, Basalt Road and at Bellevue Circuit/Charley Close intersections would operate with a Level of Service (LoS) of D or better (acceptable). As the traffic volumes are predicted to fall, the Department is satisfied the traffic impacts would be consistent with those assessed under the Concept Plan and SSD 6801. <p><u>Access</u></p> <ul style="list-style-type: none"> Light and heavy vehicles would still have separate access to each warehouse building. 	<ul style="list-style-type: none"> manage through existing conditions.

Issue	Assessment	Recommendation
	<ul style="list-style-type: none"> Revised crossovers off Dolerite Way and manouvering areas will see warehouses D1 and D2 accommodate 19 m articulated vehicles and B-Doubles, while warehouse C would accept 12.5 m heavy rigid vehicles, 19m articulated vehicles and B-Doubles. Swept path analysis shows the nominated vehicle classes can circulate for each respective warehouse in accordance with AS2890.2 (requirements for off-street parking in commercial facilities). B-Doubles would also unload from hardstand areas so side trailer doors can be used and allow easier access for long vehicles. <p><u>Car Parking</u></p> <ul style="list-style-type: none"> Condition C5 specifies car parking rates for the estate. Under these rates, the revised design requires 691 spaces. 40 spaces including 1 accessible space would be provided for warehouse C. 145 spaces including 2 accessible spaces would be provided for warehouses D1 and D2. 849 spaces will be provided overall under the proposed modifications and would continue to provide a surplus of car parking spaces in the estate. The Department's assessment concludes the traffic volumes, access and parking requirements of the proposed modifications can be accommodated by the site and the local road network and can be managed through existing conditions of consent. 	
Stormwater	<ul style="list-style-type: none"> The modification included a review of the stormwater system and updated civil plans prepared by Costin Roe to confirm the proposed changes can be managed by the approved stormwater system. The review confirmed stormwater run-off rates would remain consistent with the approved stormwater system, as impervious areas remain largely unchanged. Bio-retention basins in Precinct C have been moved to accommodate the proposed warehouse. Basins in Precinct D remain generally consistent with the approved scheme. The revised design in Precincts C and D would provide the same capacity as previously approved and continue to provide a minimum of 3,000 m² bio-retention capacity as required by SSD 6801. The Department's assessment concludes the revised stormwater system would manage stormwater quality and quantity in a manner consistent with SSD 6801. Administrative changes are recommended to include the updated plans in the development consent. 	<ul style="list-style-type: none"> administrative changes to include updated civil plans.
Heritage	<ul style="list-style-type: none"> The modification does not seek to change the approved construction/disturbance areas. The Greystanes SEL includes interpretative heritage elements in accordance with the Heritage Interpretation Plan (HIP) under the MP 06_0181. These elements included a Traylor Jaw Crusher and associated rocks to be placed at the front of the retail area along Dolerite Close. The original SSD approved variations to HIP which included relocating the jaw crusher from site 1 to site 5, and relocating site 5 to the retail area fronting Dolerite Close. To facilitate warehouse C, the Applicant seeks to relocate the jaw crusher and associated rocks from the Dolerite Close road frontage to the landscaped area between warehouse C and D1, fronting Prospect Highway (see Figure 4 and Figure 5). The Heritage Council raised no issues with the new location of these elements. The Department considers the new location is acceptable as it is a prominent location on the arterial road network and would allow the elements to be seen by road users and is consistent with the HIP under MP 06_0181 as amended by SSD 6801. 	<ul style="list-style-type: none"> administrative changes to include updated documents.
Landscaping	<ul style="list-style-type: none"> The revised layout would reduce the landscape area across the estate by 1,459 m² (-1%). Most of this loss is from the removal of the internal landscaping for the retail premises. The Applicant provided updated landscape plans which show the landscaping along the Prospect Highway and Dolerite Close frontage is generally consistent with the approved landscaping. 	<ul style="list-style-type: none"> administrative changes to include updated plans.

Issue	Assessment	Recommendation
	<ul style="list-style-type: none"> The Department considers this revised landscaping is acceptable as it is a minor decrease considering the total area of the estate and would still soften the appearance of warehouse C when viewed from the street. On this basis, the Department has recommended changes to include the updated landscape plans in the development consent. 	
Signage	<ul style="list-style-type: none"> The modification does not seek to change the design of the approved signage strategy. However, the changes to the building layouts will reduce the number of signs within Precinct C as the five retail uses are being replaced by one warehouse. The Department is satisfied this change is acceptable and would be carried out in accordance with the approved signage strategy. 	<ul style="list-style-type: none"> manage through existing conditions of consent and the approved signage strategy.

8. CONCLUSION

The Department has assessed the proposed modification in accordance with the relevant requirements of the EP&A Act. The Department considers the proposed modification is appropriate on the basis that:

- the proposed modification will result in minimal environmental impacts beyond the approved estate
- they will facilitate specific end user needs for future tenants within the QuarryWEST estate
- the proposed amendments will ensure the development remains consistent with the SSP SEPP and Concept Plan (MP 06_0181) and is substantially the same development as SSD 6801.

The Department is satisfied that the modification should be approved, subject to conditions.

9. RECOMMENDATION

It is recommended the Director, Industry Assessments, as delegate for the Minister for Planning:

- consider the findings and recommendations of this report
- determine that the application SSD 6801 MOD 5 falls within the scope of section 96(1A) of the EP&A Act
- modify the consent SSD 6801
- Sign the attached approval of the modification (Attachment A).

Recommended by:



Thomas Piovesan
Senior Planning Officer
Industry Assessments

Recommended by:



Joanna Bakopanos
Team Leader
Industry Assessments

DECISION

The recommendation is: Approved by:



Chris Ritchie
Director
Industry Assessments
as delegate of the Minister for Planning

APPENDIX A – NOTICE OF MODIFICATION

See link http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8889

APPENDIX B – STATEMENT OF ENVIRONMENTAL EFFECTS

See link http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8889

APPENDIX C – SUBMISSIONS

See link http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=8889

APPENDIX D – CONSISTENCY WITH SSP SEPP AND CONCEPT PLAN MP 06_0181

The following tables assess the modification application against the development standards of the SSP SEPP (see **Table 3**) and the existing Concept Plan (MP 06_0181) (see **Table 4**). The Department's assessment concludes the development as modified would continue to comply with the SSP SEPP development standards.

The Department also notes the approved development contains several departures from the Concept Plan. The Department is satisfied the proposed modifications to the development remain generally consistent with the Concept Plan, despite these existing departures, which were approved under the original SSD and subsequent modifications.

Table 3: Compliance with Relevant SSP SEPP Development Standards

SSP SEPP Control	Complies (Y/N)	Comment
13. Height of Buildings The height limits in the Greystanes SEL are: <ul style="list-style-type: none"> 25 m in the B7 zone; and 15 m in the IN2 zone. 	N (existing non-compliance)	The Approved development contains buildings above the SSP SEPP height limits, including Warehouse B2 which were assessed under SSD 6801 MOD 3. However, the revisions to warehouses D1 and D2 and new warehouse C are below the height limits of B7 zone, which would be approximately 13.7 m, and therefore comply.
14. Gross Floor Area Maximum GFA in the B7 zone is 104,000 m ² , of which: <ul style="list-style-type: none"> max. of 6,500 m² for retail premises, service stations and vehicle repair stations, with a max. pub GFA of 2,500 m²; max. supermarket GFA of 2,000 m²; max. GFA for other uses of 97,000 m²; and min. GFA of 3,000 m² for any building containing office premises; Maximum office GFA in the IN2 zone is: <ul style="list-style-type: none"> 50 %, for lots within 400 metres of bus stop; and 30 %, for lots more than 400 metres of bus stop. 	Y	The modified development will result in a maximum GFA of 71,885 m ² in the B7 zone, which is under with the limit of the SSP SEPP. As discussed in Section 7 above the retail and services uses in Precinct C would be removed. The revised layout of warehouses D1 and D2 and new warehouse C have an ancillary office components of less than 30 % and therefore comply.
15. Flood Space Ratio The FSR of the any building within the IN2 zone must not exceed 0.75:1	Y	The revised estate layout has a slightly higher FSR from 0.43:1 to 0.51:1, which remains under the FSR limit of 0.75:1 under the SSP SEPP.
16. Hotel Accommodation	N/A	No hotel accommodation is proposed.
17. Child Care Centres	N/A	No child care centres are proposed.
18. Car Parking <ul style="list-style-type: none"> Light industry: 1 space/77 m²; Office: 1 space/40 m²; retail: 1 space/20 m²; industrial: 1 space/77 m²; and warehouse: 1 space/300 m². 	Y	The revised estate layout complies with the SSP SEPP car parking rates and provides a surplus of car parks over the minimum required (see Table 2).
21. Design Excellence The consent authority must have regard to the following: <ul style="list-style-type: none"> whether a high standard of architectural design, materials and detailing appropriate to the building type and location will be achieved; whether the form and external appearance of the building will improve the quality and amenity of the public domain; and whether the building will meet sustainable design principles. 	Y	The revised architectural designs and finishes are considered to exhibit design excellence as they are of a high standard, incorporate a range of materials, reflect the location and orientation of the warehouse buildings in Precincts C and D and would be in keeping with the character of surrounding warehouse buildings in the estate.

SSP SEPP Control	Complies (Y/N)	Comment
22. Architectural Roof Features <ul style="list-style-type: none"> to ensure that architectural roof features are decorative elements only, and to ensure that most the roof features are contained within the prescribed building height. 	N/A	The development does not involve architectural roof elements above the proposed heights, other than as shown on the architectural plans.
23. Public Utility Infrastructure Requires infrastructure to be provided, including potable water, electricity, gas and sewerage	Y	All required infrastructure for the Greystanes SEL has been approved under existing approvals (MP 06_0181 and SSD 6801)

Table 4: Compliance with Relevant Items of Concept Plan MP 06_0181

Concept Plan Requirement	Complies (Y/N)	Comment
GFA Maximum GFA of 493,215 m ² comprised of: <ul style="list-style-type: none"> a maximum of 97,500 m² for business park uses; and a maximum of 6,500 m² for service retail uses, of which no more than 2,000 m² is permitted for supermarket uses. 	Y	The proposed estate layout has a maximum GFA of 124,731 m ² . This is an increase of 3,545 m ² from the currently approved layout under SSD 6801 MOD 4, but less than the GFA originally approved (127,765 m ²). This continues to comply with the GFA requirements of the Concept Plan. Factoring the QuarryEAST project (MP 08_0259) (GFA of 250,607 m ²) the combined area totals 375,338 m ² , under the SSP SEPP GFA limit.
FSR Maximum FSR of 0.75:1 in the industrial precinct.	Y	The proposed modifications would result in a development FSR of 0.51:1 which as stated in Table 3 complies with the FSR control of 0.75:1.
Road Design Compliance with the conceptual road design which comprises: <ul style="list-style-type: none"> a 4-lane 50 m wide north-south central spine (Prospect Highway); a 2-lane 30 m wide east-west boulevard; and local roads with 20 m wide road reserves and 14 m wide carriageways. 	Y	The approved development contains minor variations to the conceptual road design which remain unchanged under this modification application. No changes to the road design are proposed as part of this modification. The Department is satisfied the road design of the proposed modification is consistent with the Concept Plan.
Urban Design The Development is to be consistent with the "Greystanes Estate Southern Employment Lands Urban Design Plan" (UDP).	N (existing non-compliance)	The approved development has several departures from the UDP in regards to streetscape (road corridor width), setbacks, business precinct landscaping coverage and building height (including the exceedance of the 15 m height limit under the SSD SEPP for warehouse B2 approved under SSD 6801 MOD 3). The proposed modification seeks no changes from the UDP. The Department notes landscape and building setbacks for new warehouse C are consistent with the UDP.
Car Parking <ul style="list-style-type: none"> office: 1 space/40 m²; retail: 1/20 m²; industrial: 1/77 m²; and warehouse: 1/300 m². 	Y	As discussed in Table 2 , the revised layout will provide 849 car parking spaces for the estate, exceeding the number required under the Concept Plan car parking rates.