

ATTACHMENT H

Department of Planning Letter Dated 4th October 2011

in response to

Submitted Test of Adequacy Documents

plus

CBHK Planning's response dated 31 October



Planning & Infrastructure

Contact: Caroline Owen
Phone: 9228 6574
Fax: 9228 6540
Email: caroline.owen@planning.nsw.gov.au

Mr Lindsay Hunt
Colston Budd Hunt & Kafes Pty Ltd
PO Box 5186
WEST CHATSWOOD NSW 1515

Our ref: MP 10_0143

Dear Mr Hunt,

Subject: Adequacy of the Environmental Assessment for- Mixed Use Development, at the Columbia Precinct 2-20 Parramatta Road & 11-13 Columbia Lane, Homebush (MP 10_0143)

I refer to your lodgement of an Environmental Assessment (EA) on 19 August 2011 for the above project.

The Department has reviewed the EA and is generally satisfied that it adequately addresses the Director-General's Environmental Assessment Requirements issued on 11 November 2010 provided that additional information is submitted prior to the EA being placed on public exhibition (**ATTACHMENT 1**).

Once the information has been submitted and considered satisfactory, you should submit the following information so that the EA may be placed on public exhibition:

- 5 hard copies of the Environmental Assessment;
- 5 sets of architectural and landscape plans to scale, A3 size; and
- 5 copies of the Environmental Assessment and plans on CD-ROM (PDF format), each file not exceeding 5Mb in size.

The EA will be placed on exhibition and will be made publicly available at the following locations during their regular business hours:

- **Department of Planning & Infrastructure**, Information Centre, 23-33 Bridge Street, Sydney
- **Strathfield Council**, Customer Services Centre, 65 Homebush Road, Strathfield

An invoice for the required project fee will be forwarded under separate cover. This fee is payable within 14 days of the commencement date of public exhibition. The Department will notify you of this date shortly.

Please note that the Department has not undertaken a detailed assessment of the EA at this time. There may be issues arising from the detailed environmental assessment and public consultation process that you will need to address in a response to submissions or a Preferred Project Report.

Your contact officer for this proposal, Caroline Owen, can be contacted on (02) 9228 6574 or via email at caroline.owen@planning.nsw.gov.au. Please mark all correspondence regarding the proposal to the attention of the contact officer.

Yours Sincerely,

Anthony Witherdin
A/ Director, Metropolitan & Regional Projects South

ATTACHMENT 1

The following additional information is required to be submitted, in accordance with the DGR's, prior to the EA being placed on public exhibition:

General Requirements

- 1 • Section 1.3 of the Environmental Assessment (EA) shall be modified to clearly define the proposed development including:
 - details of existing buildings to be demolished or retained;
 - details of the proposed floor space of each land use including retail, commercial, community facility uses and self-storage uses;
 - details of the number of buildings proposed and building heights.
- 2 • The Concept Plan Design Drawings shall be modified to clearly illustrate the proposed works. All works outside of the site boundary shall be clearly distinguishable as indicative only or part of the proposal.
- 3 • The Economic Assessment (Annexure 7) shall be modified to address the following issues:
 - Once the exact GFA split has been nominated, the report shall be amended to assess the impacts of the proposed commercial & retail floorspace on surrounding centres; and
 - the report shall detail the likely impacts resulting from the loss of existing employment land.
- 4 • The landscape Design Report (Annexure 8) shall be modified to address the following:
 - the report shall clearly identify which works are proposed as part of the Concept Plan, specifically addressing the Parramatta Road Overhead Access Bridge and the bridges over the Powells Creek Stormwater Canal;
 - all illustrations shall be modified to clearly illustrate the site boundary and make clear any works shown outside the site boundary are indicative only or part of the proposal;
- 5 • If the connecting bridges shown on the landscape plans are part of the proposed development, details shall be provided in Section 1.3 of the EA. Details of the method of delivery (including funding) of these bridges should be provided.
- 6 • The EA shall identify land owners of adjoining lands likely to be impacted upon by the proposed development.
- 7 • The final EA is to be accompanied by a completed application form and Political Donations Disclosure Statement.
- 8 • The final EA shall:
 - include a signed Author's Statement; and
 - be presented in amalgamated ring binder(s) for ease of use.

Colston Budd Hunt & Kafes Pty Ltd

as Trustee for C & B Unit Trust
ABN 27 623 918 759

Our Ref: LBH/7453.2/jj

Transport Planning
Town Planning
Retail Studies

15 November, 2011

The Director-General
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Anthony Witherdin/Caroline Owen

Dear Anthony, Caroline,

RE: MP 10-0143 'COLUMBIA PRECINCT', STRATHFIELD LGA
ENVIRONMENTAL ASSESSMENT DOCUMENTATION FOR
CONCEPT PLAN MAJOR PROJECT APPLICATION

Thankyou for your letter of 4 October 2011 in response to our draft EA documentation for the Columbia Precinct project submitted with covering CBHK letter of 6 August 2011 for the Department's Test of Adequacy. This Project was declared to be an application made under Part 3A of the Act by Departmental Declaration dated 17 October 2010, and so is preserved.

The Project Team has responded where necessary to satisfy the matters you raise in Attachment 1 to your 4 October letter by corresponding amendments of the EA documents lodged on 6 August, as discussed under paragraph #3 below. These include two new Mayoh drawings as described below, several amended drawings clarifying site boundaries and adding or amending annotated notes, a revised economic report prepared by Leyshon Consulting, and a revised CBHK EA Report in final format.

The requisite number of all EA documents are attached hereto, as are the completed application form, the donations disclosure statements provided by the landowners and by the applicant, and the application fee will be provided when the amount is notified.

The responses to each dotpoint in your Attachment 1 to your letter (attached again to the current letter for ease of reference) are as follows:-

- 1.1 Buildings for demolition** include all buildings currently on-site shown on drawing AC.04A, other than the existing Kennards storage building shown coloured blue-green on A.103A, which is to be modified, refurbished, and extended by a new light-weight top storey of storage. New Mayoh Architects' drawing AC.14A illustrates (see attached).

- 1.2 Floorspace details** by type of use are noted in the table to section #3.14 of the EA Report, and I have now repeated them in earlier sections of that report for added clarity. The final make-up is currently projected to be:-

Units (res.)	645 (mix and therefore final number could vary)
Commercial	4540m ² GFA (incl. Kennards offices)
Retail & showroom	4800m ² GFA
Self-storage	12700m ² GFA
Community use	920m ² GFA

- 1.3 Detail of proposed buildings and heights** are illustrated on Mayoh Dwgs A.301A, A.150A and A.160A, submitted on 6 August, as discussed, and are considered sufficient for the purpose.

- 2. Proposed EA Works** are restricted to those within the 'Site' delineated on Figures 2 and 3 of the EA Report, and by heavy black line on the PD Mayoh AC.05-AC.10 sheets, and by clearer delineation on several other sheets. (Note that the site definition also includes minor works i.e. not buildings, within Council-owned public lanes within the site). Proposed works outside the 'Site' include the new Powells Creek Reserve pedestrian bridge across Parramatta Road and related embellishment works within the Reserve, which are offered as S.94 off-sets (subject to RTA and Council approval respectively), and the related intersection upgrade works on Parramatta Road adjoining the site (which are not seen as S.94 off-set works). The other pedestrian bridges across Sydney Water's stormwater channel are considered desirable elements of the Precinct, but are dependent upon Council acquisition of Lot 2/814227 (Open Space reserve), and Sydney Water approval, neither of which has occurred to date. (Sydney Water has only indicated its support for one pedestrian overbridge, and that bridge is most likely to be the northern one linking two parcels of Consortium-owned Stage One land).

For purposes of clarity, Mayoh Architects have provided further information on a new Indicative Design Plan A.003A, titled Potential Works Outside Site Perimeter, which is both attached to this letter and included in the EA documentation.

- 3.1 The Leyshon Economic Assessment** report on page 25 nominates the following floorspace split as adopted for inclusion in the analysis:-

Neighbourhood retail	1300m ²
Bulky goods/showrooms	3476m ²
Commercial/offices	3000m ²

The retail component at 4776m² (1300 + 3476 above) represents the 4800m² (rounded) contained in the EA Report and repeated above under dotpoint #1. The 3000m² commercial/offices figure represents the 4540m² under dotpoint #1 less the office floorspace to be occupied by Kennards' administration here, as the Leyshon study is not concerned with impact from existing employment. Accordingly, in my opinion the Leyshon report's findings in Chapter 4 regarding retail and commercial impacts are considered to remain valid. I have now included clarifying comments on that score in Chapter 1 of the EA report and in Sections 3.6 and 3.14 on development staging.

- 3.2** **Loss of existing employment land** is the second matter raised in the third point in Attachment 1 to the Department's letter. The Columbia Precinct lands in question are actually a Mixed Use zone. The subject proposal for the land is in fact a mixed residential/employment development broadly consistent with the zoning, and in a floorspace mix designed to be compatible with market expectations and consistent with metro planning strategy and Centres Policy. The subject proposal will provide for some 400 jobs, notably more than provided on-site today given the presently strong warehousing representation. (Leyshon estimate of 150 persons currently, based on observation of the land uses in residence today). Much of the proposed employment will be local-serving, rather than more 'footloose' types of employment which should more sensibly locate in nominated centres better served with public transport and other support services. To replace the residential buildings with office towers would make little sense at this location, and generate negative knock-on effects. Other employment uses such as warehousing or manufacturing would not be commercially or economically viable.

In summary, it is not agreed that any negative impacts might result from a hypothetical loss of 'existing employment land' as stated.

Additional commentary on the above topic has been incorporated in the EA and Leyshon reports.

- 4.** **The Site Image P/L Landscape Design Report** has now been amended as requested, consistent with our response above to your second dotpoint, primarily involving clearer illustration of site boundary and additional explanatory notes. One additional Site Image drawing is provided, being the Landscape Scope diagram shown at page 11 of their amended documentation, consistent with the new Mayoh drawing A.003A attached, clearly identifying what works are proposed as part of this application and those that are the responsibility of others. All the Site Image Landscape Concept Plans from page 10 onwards now clearly show the site boundary as a dotted line.

5. **The connecting bridges** all form part of the proposed development, and are proposed to be constructed by the Consortium once the related agreements are reached with the RTA, Strathfield Council and Sydney Water as necessary. The Parramatta Road overbridge forms part of the strategic Powells Creek Corridor, and is therefore intended as a Section 94 off-set as discussed in the EA report. The pedestrian bridges across Sydney Water's stormwater channel would be provided by the proponent, but are subject to Sydney Water's approval. If only one stormwater bridge is acceptable to them, then the northernmost bridge would be constructed (if approved) as part of Stage One of the Precinct development, as the two bridges further south cannot be built until Lot 2 on the western side of the channel is acquired by Council as part of the of the open space reserve land. It is nevertheless still considered that the southern two bridges are desirable (although not necessarily essential), as they would certainly improve connectivity and provide increased use both of the pedestrian link through to Station Street and the Lot 2 open space extension.
6. **The information on land ownership** of adjoining allotments is provided in the attached under separate cover by the project surveyors Hill & Blume, identifying the ownership of the adjoining lands. The one exception as the two remnant parcels coloured yellow on Hill & Blume's attached plan, which do not appear to have Title notwithstanding the Lot and DP numbers shown on the LPMA composite extract coloured up. Formal searches have now been instigated of LPMA records to establish the status of these unattributed parcels, and this information will be forwarded to the Department as soon as it is provided. The most likely outcome is that the land in question will be found to belong to Sydney Water, given that David Lhuede's investigations indicate that it was in fact an easement for drainage in the 1950's, and may have been acquired or resumed at that time by the MWS&DB for that purpose. If it was not acquired by the Water Board or Sydney Water, then the current ownership may still reside with that of the land from which it was excised – in this case David Lhuede P/L.

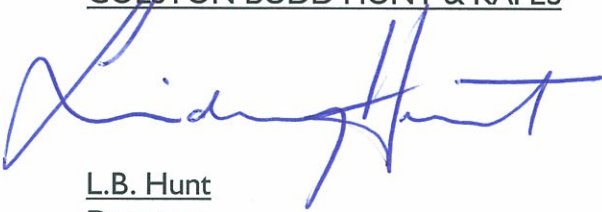
Neither outcome is an obstacle for the Concept Plan proposed, as its intended usage is as landscaping, not buildings.
7. **The Completed Application Form** and Political Donations disclosure statement are both provided, and a cheque for the application fee will be issued in due course in accordance with the Department's requirements when received.
8. **The Author's Statement** in the EA Report can now be signed, and all the documents (as now revised and signed) have been combined under common ring binders. Five copies of all documents plus electronic copy are provided, as requested.

Colston Budd Hunt & Kafes Pty Ltd

I hope the above and the attached are all in order. However should you have any queries at all please do not hesitate to call me direct on one of the numbers below.

Yours faithfully,

COLSTON BUDD HUNT & KAFES



L.B. Hunt
Director

Encl.

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