

10 March 2021

Mr Jim Betts  
Secretary  
Department of Planning, Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Dear Mr Betts,

**MP10\_0118 EDMONDSON PARK SOUTH  
PROPOSED CONCEPT PLAN MODIFICATION NO. 10 – PRECINCT 3**

I write in relation to a proposed modification (Mod 10) to the Edmondson Park South Concept Plan (MP10\_0118). The purpose of this letter is to request Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Assessment for the proposed modification. The applicant for this matter is Landcom with the key contact being Kate Denney, Senior Development Manager on [kdenney@landcom.nsw.gov.au](mailto:kdenney@landcom.nsw.gov.au) or the undersigned.

To support the request for SEARs this letter provides an overview of the modifications sought to the Concept Plan and identifies the key likely environmental and planning issues associated with the proposal.

The proposed section 75W modification application seeks to:

1. Amend the maximum number of residential dwellings provided for under the Concept Plan from a total of 4,502 to 4,852 dwellings (an increase of a maximum of 350 dwellings) to be developed within Precinct 3 (where currently 250-270 dwellings are provided for and up to 600 are now proposed) in accordance with

the Urban Design Review prepared for the Precinct by Smith and Tzannes (19 July 2018), and

2. Vary the road layout as currently approved in the Road Network Hierarchy Concept Plan and DCP.

The proposed modification does not relate to the existing heritage item on site, the Bardia Barracks.

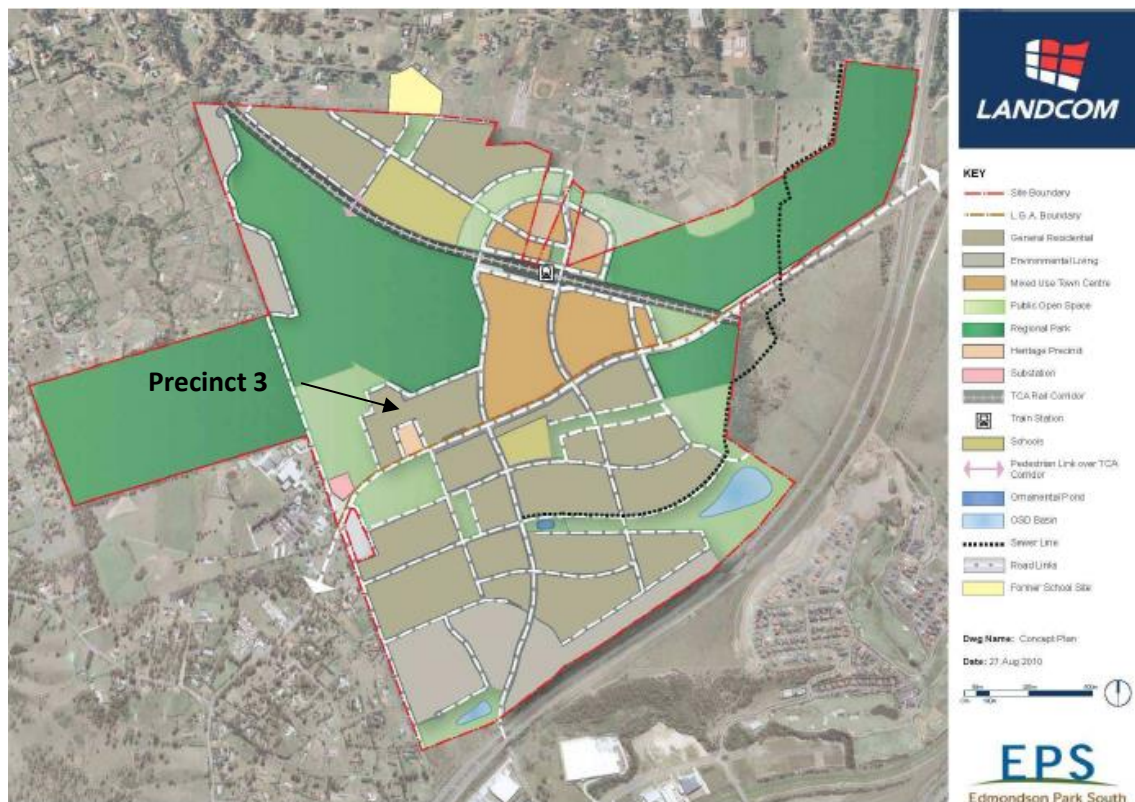
## 1. BACKGROUND

In March 2010 Landcom lodged a Concept Plan (MP 10\_0118) and concurrent Project Application (MP 10\_0119) for the development of Edmondson Park South. The Concept Plan was approved by the Planning Assessment Commission (now Independent Planning Commission) on 18 August 2011 and provides for a development on approximately 413 hectares of land, including provision of a new town centre adjacent to Edmondson Park Station incorporating a mix of retail, commercial, business, civic, community, recreation, residential and mixed-use employment. The Concept Plan provided for residential development of 3,530 dwellings although it is noted that the application itself sought consent for 'approximately' [*emphasis added*] 3,530 dwellings to support the location of a new train station at Edmondson Park. This number has since been modified by Modification 4 to 4,502 dwellings (12 October 2017).

To facilitate the redevelopment of Edmondson Park South under the Concept Plan, the site was listed in Part 31 of Schedule 3 of the Major Development SEPP (now Appendix 16 of the State Significant Precincts SEPP). The State Significant Precincts SEPP zones the Edmondson Park South site whilst also providing maximum building height, FSR and minimum lot size development standards. The listing also includes a range of miscellaneous provisions, including heritage listings and the requirement to prepare a Development Control Plan to guide the future redevelopment of the Edmondson Park South site.

A series of modifications to the Concept Plan have been submitted since its original approval. Most notably modification (Mod 5), currently under assessment, relates to

the Town Centre North and Precinct 3 and seeks to amend the boundary of the Concept Plan site to include land owned by the Office of Strategic Lands, in addition to other development modifications (with amendments to *State Environmental Planning Policy (State Significant Precincts) 2005*) relating to floor area, school zone, road layout, dwelling yield, type and mix, building height, and bushfire asset protection zones. Relevant to the subject modification it also seeks to increase the dwelling yield within the Town Centre North Precinct from 440 to up to 3,286 dwellings and if approved would increase the total yield within the Precinct to 7,348 dwellings (not including the subject modification). Further in relation to Precinct 3, the Mod 5 seeks to make 'studios' (fonzie flats) permissible within the Precinct via a concurrent amendment to the SEPP provisions. As part of this modification, approval is also sought to allow studios to be subdivided on to separate title. The Mod 5 application is currently being assessed by DPIE but at the time of writing has not been determined.



**Figure 1:** Approved Edmondson Park South Concept Plan

## 2. CONCEPT PLAN DWELLING NUMBERS SUMMARY

The Concept Plan approval, as issued by the Independent Planning Commission, provided for “residential development of 3,530 dwellings”. Notably the approval does not state that this number is a maximum however does not refer to it as being a minimum or an approximate number either.

Although the application itself sought approval for “approximately 3,200 dwellings” when issued the approval appears to have been set as a maximum. The approval of 3,530 dwellings seems to have been calculated by adding together the dwelling allocation for the respective precincts within Edmondson Park South as outlined in Table 3 of Edmondson Park South DCP 2012 (reproduced below).

The DCP however specifically states that:

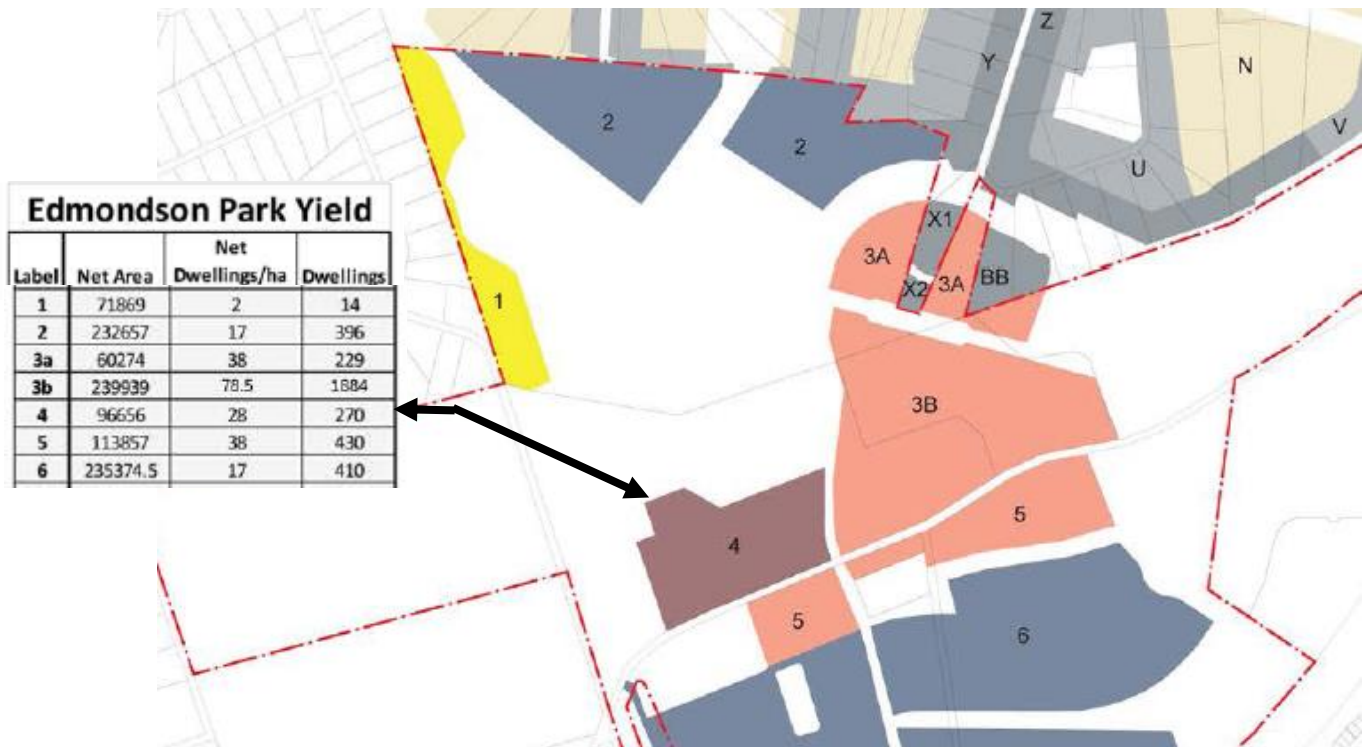
*The minimum [emphasis added] residential dwelling target for Edmondson Park South is 3,699 being 3,530 dwellings in the Landcom project and 169 dwellings in other landholdings. In order to ensure the minimum [emphasis added] residential dwelling targets are achieved, as part of a subdivision application, an applicant is to demonstrate to Council that the area dwelling targets shown in Figure 4 and Table 3 can be achieved (Section 2.3 Residential Dwelling Targets, p. 13).*

**Table 3 - Dwelling targets by precinct**

Area	Dwelling Target
1A	398
1B	912
2	439
3	13
4	250
5A & 6A	300
5B & 7B	489
6B	482
7A	347
8A	18
8B	51
<b>Total Dwellings</b>	<b>3699</b>

*Note: Area 4 as referred to above is now known as Precinct 3. Further 169 dwellings included in Table 3 are not the subject of the Concept Plan being in separate ownership.*

The approved Concept Plan also includes a yield schedule which shows 270 dwellings within Precinct 3 as shown in Figure 2 below.



**Figure 2:** Edmondson Park Yield from Concept Plan

Accordingly it seems that it was the intention, at the time of the Concept Plan lodgement and DCP formulation, that a minimum residential dwelling density of 3,530 dwellings would be achieved within the Concept Plan area rather than a maximum. This however does not appear to have translated into the approval that was issued by the Independent Planning Commission. Other modifications have been submitted to increase the dwelling yield under the Concept Plan and it is therefore considered appropriate that a modification be submitted in the subject case to ensure an abundance of caution.

### 3. PROPOSED CONCEPT PLAN MODIFICATION

It is proposed to modify the Concept Plan (as amended) to:

1. Amend the maximum number of residential dwellings provided for under the Concept Plan from a total of 4,502 to 4,852 dwellings (an increase of a maximum of 350 dwellings) to be developed within Precinct 3 (where currently 250 – 270 dwellings are provided for and up to 600 are now proposed) in accordance with the Urban Design review prepared for the Precinct by Smith and Tzannes (19 July 2018), and
2. Vary the road layout as currently approved in the Road Network Hierarchy Concept Plan and DCP.

As noted above the proposed modification does not relate to the existing heritage item on site, the Bardia Barracks.

Under Edmondson Park South DCP 2012 it appears that an allocation of 250 dwellings has been factored into the overall dwelling numbers within the release area for Precinct 3 (previously referred to as Area 4). The approved Concept Plan also includes a yield schedule which shows 270 dwellings on the Precinct 3. Post approval Smith and Tzannes has undertaken a detailed design review (refer Attachment 1) of the Precinct and prepared a masterplan for its development. The masterplan is illustrated in Figure 3 below.

The masterplan provides for development of the precinct in a variety of typologies including apartments, stacked terraces, garden maisonettes, terraces & fonzie flats (studios), manor houses and shop top housing apartments. This is consistent with Landcom's commitment to the provision of housing diversity within the release area which seeks to cater to the full range of household types and demands within close proximity of public transport and services. The design analysis provides that approximately 500-600 dwellings can be accommodated within the Precinct as illustrated. To allow flexibility in the final design however it is proposed that up to 600 dwellings be provided for in Precinct 3 by amending the dwelling cap set out in the Concept Plan.



Notably the Masterplan is generally consistent with the Edmondson Park South DCP 2012 (albeit with an amended road layout) however Design Guidelines consistent with the Frasers Town Centre (Mod 4) and the Town Centre North (Mod 5), or a precinct specific amendment to the DCP, are proposed to be submitted with the application to provide further guidance on the final development form. This is particularly important having regard to the interface with, and heritage significance of, the Bardia Barracks (Ingleburn Military Heritage Precinct) part of the site and its surrounds.



**Figure 3: Precinct 3 Masterplan**

#### 4. MODIFICATION OF A CONCEPT PLAN APPROVAL

Part 3A, clause 3BA of Schedule 2 of the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017* states:

*(5) A concept plan may continue to be modified under section 75W pursuant to a request lodged on or after the cut-off date (whether or not the project is or*

*has ceased to be a transitional Part 3A project), but only if the Minister is satisfied that—*

- (a) the proposed modification is to correct a minor error, misdescription or miscalculation, or*
- (b) the proposed modification is of minimal environmental impact, or*
- (c) the project to which the concept plan as modified relates is substantially the same as the project to which the concept plan currently relates (including any modifications previously made under section 75W).*

Accordingly an application can be submitted to modify a Concept Plan approval subject to the above criteria. The proposed modification to increase the dwelling numbers and road layout fits into this criteria being substantially the same as the project to which the Concept Plan currently relates (including any modifications) as it will continue to:

- provide a variety and diversity of housing consistent with the capacity of the Precinct
- be broadly consistent with the density and scale of development originally anticipated in the Concept Plan
- ensure the conservation and preservation of the significant heritage item on site (Bardia Barracks) including an appropriate curtilage around the item, and
- meet the housing needs of the community in an area ideally suited to the proposed use within close proximity to public transport, services and facilities.

The proposed modification will result in an increase of approximately 8% in the number of dwellings permitted within the Precinct were it to be assumed that the current maximum is indeed a maximum number. This increase is minor only, will not result in any adverse impacts and is substantially the same as originally anticipated by the Concept Plan.



## 5. STATE SIGNIFICANT PRECINCTS SEPP

The Edmondson Park South site is listed as a State Significant Precinct in Appendix 16 of the State Significant Precincts SEPP. The SEPP zones the land the subject of the modification R1 General Residential.

No amendment to Appendix 16 of the State Significant Precincts SEPP is required to facilitate the proposed increase in dwelling numbers as the Concept Plan prevails over the SEPP. It is however noted that Mod 5 (current separate application) seeks to make 'studios (fonzie flats)' permissible within Precinct 3 via a SEPP amendment and allow for studio dwellings to be subdivided on to separate title.

## 6. OVERVIEW OF LIKELY PLANNING ISSUES

The following key assessment issues will be addressed as part of the modification:

- proposed land use including proposed density and development yield;
- urban design and built form, including consideration of the proposed height, scale and form of development and landscape and public domain treatment within the precinct;
- traffic, parking, and accessibility;
- impact on heritage items in the vicinity;
- social and utilities infrastructure, and
- stormwater drainage.

Design guidelines will also be prepared to support the proposed modification.

## 7. CONSULTATION

As part of the modification application, consultation will be undertaken with the following stakeholders:

- Liverpool City Council
- Heritage NSW

- Transport for NSW, and
- Social and Utility Infrastructure providers.

All consultation will be undertaken in accordance with the Department of Planning, Industry and Environment's consultation guidelines.

## 8. CONCLUSION

We trust that the above information is sufficient to enable the Secretary to issue Secretary's Environmental Assessment Requirements (SEARs) for the Concept Plan Modification (Mod 10).

If you have any queries regarding this matter or require any further information, please do not hesitate to contact the undersigned on 0405 180 117 or via email at [hmill@mgplanning.com.au](mailto:hmill@mgplanning.com.au).

Yours faithfully

A handwritten signature in black ink, appearing to read 'H. Miller', with a stylized flourish at the end.

Helena Miller  
Director

# **Attachment 1**

---

Edmondson Park Design Review

Smith & Tzannes

# EDMONDSON PARK DESIGN REVIEW

EDMONDSON PARK PRECINCT 3  
REV C 19-07-2018

SMITH & TZANNES

KEY THEMES

There are several key themes that can tie the proposed development to the site and provide it with greater depth and meaning.

- Connections to the town centre and surrounding areas - in particular the green space that surrounds the site.
- The past history as the Ingleburn Military Precinct - both the social and physical history
- The topography and hydrology and existing natural features.

These key themes remain consistent with the overall all principles and structuring framework which were approved in the Concept Plan.

The aim is to create a legible pattern of streets and blocks that not just enable quality medium density development but also tie the street and block layout to the natural and historical features of the site.

CONNECTIONS

A strong east - west connection is desirable through the site to link the town centre, and the 'Fraser's site' with the recreation areas to the west of this precinct.

The connection has the opportunity to draw people travelling through into the heart of the cultural precinct.

Visual and physical connections should not be ignored to the Mount St Quentin Oval

The visual and physical connections to Edmondson Regional Park



CONNECTIONS

URBAN DESIGN REVIEW - PRECINCT 3 EDMONSON PARK

18\_029  
REV A 19-07-2018



HERITAGE

The layout and experience of the site should contain a reflection on the cultural and physical heritage of the site - in particular the role it played as a Defence training site.

The Ingleburn Defence Site, which was, from 1939 to the 1970s, one of Australia’s major army camps, is a place of considerable historic significance. The site played a central role in the mobilization of Australia’s citizens and their military training throughout World War II and was the first purpose-built infantry training camp for World War II. It was the assembly point for the first military contingent assembled for overseas service in World War II and is associated with training for the Korean and Vietnam Wars and the anti-conscription movement.

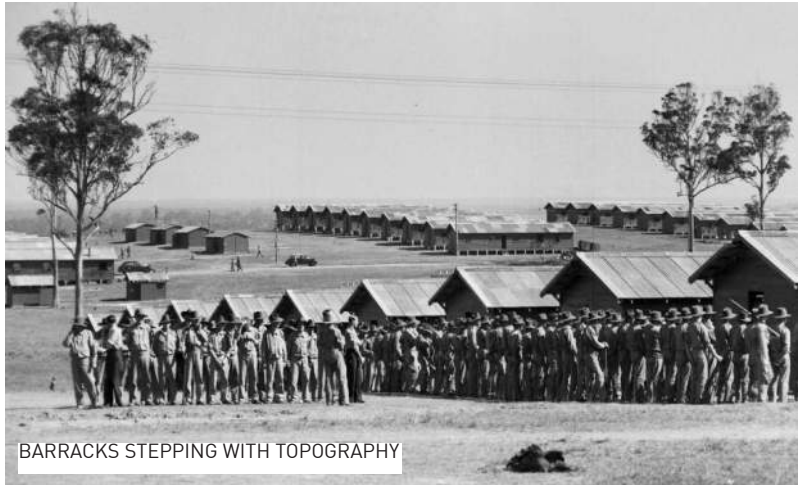
Ingleburn Defence site is of social significance as it is a symbol of the service given by the generations of soldiers who trained here and as a place where respect for and remembrance of that service has become a continuity and highly valued tradition.

Ingleburn Defence site is of social significance for the local community as a landmark that symbolizes the important historical and contemporary role played by the Army within the area and as a community meeting place, where links were forged between civilians and Army.

Only a small number of the buildings on the site remain - in the area known as ‘Bardia Barracks’. This group consist of representative examples of the standardized barracks and support structures that were erected in response to the training demands of World War II.

The principles of development on the site should not just respect the physical heritage - as a preservation item, but also provide links to the cultural connections of the site - including the connection to the placement of social and community facilities vs residential ones

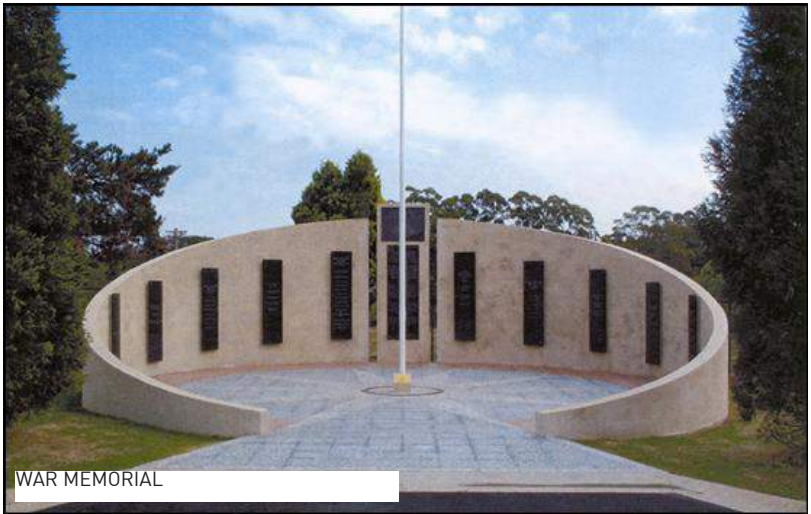
The barracks typically ran parallel to the topography, with the streets running perpendicular to the barracks - this layout makes sense in both connecting the history of the site and the natural features. Impressions of the footprints of barracks and other notable features of the site could be represented through public art.



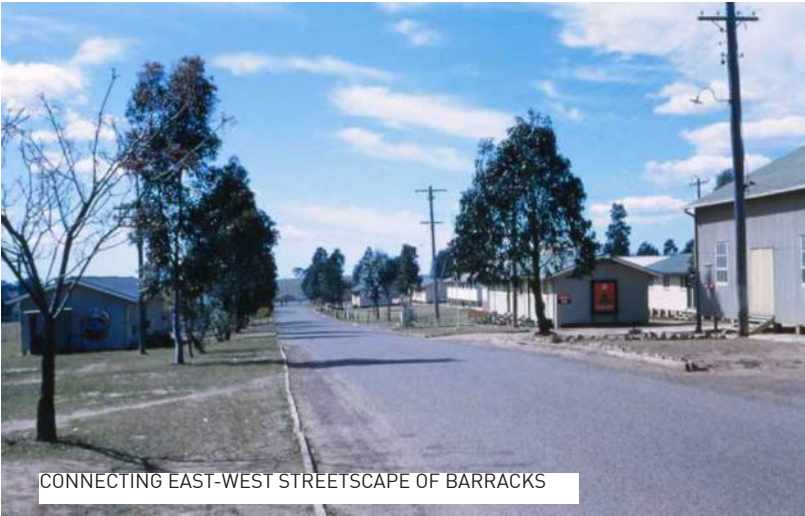
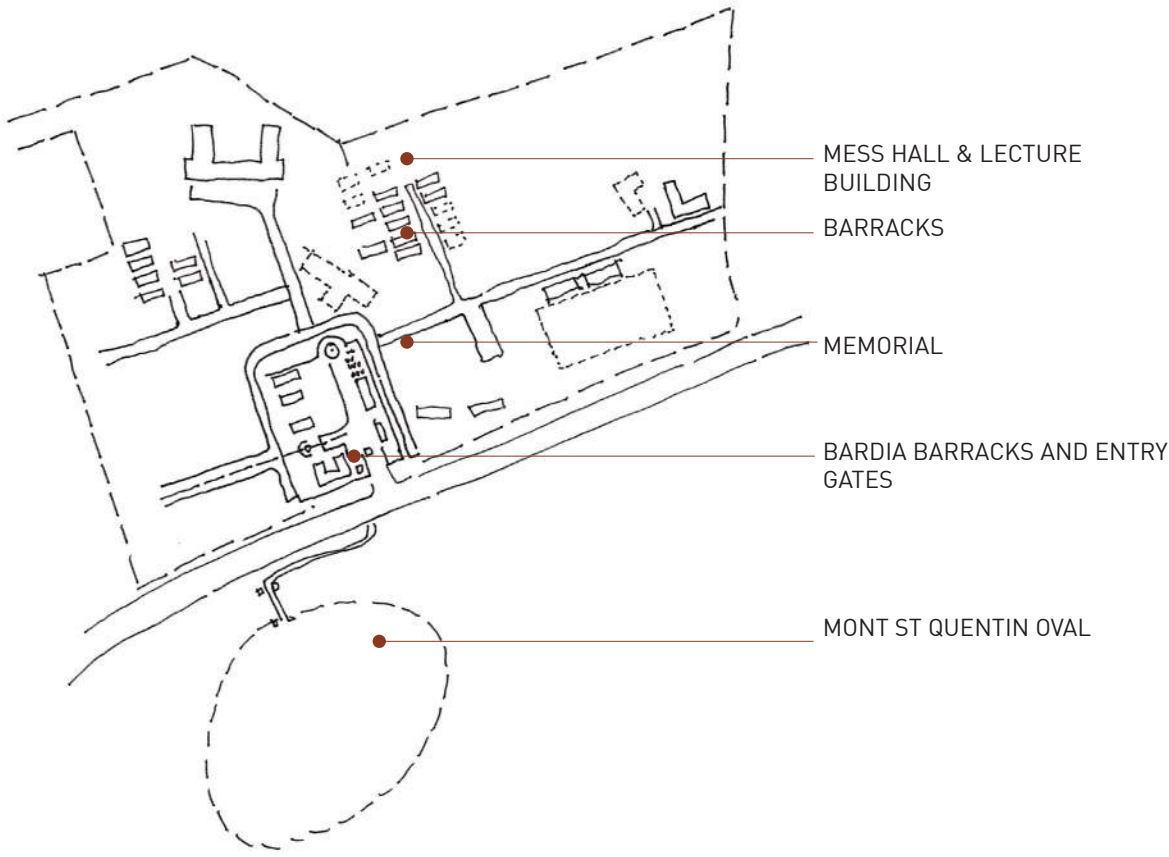
BARRACKS STEPPING WITH TOPOGRAPHY



BARDIA BARRACKS ENTRY GATES



WAR MEMORIAL



CONNECTING EAST-WEST STREETSCAPE OF BARRACKS

INGLEBURN MILITARY HERITAGE PRECINCT

URBAN DESIGN REVIEW - PRECINCT 3 EDMONSON PARK

18\_029  
REV A 19-07-2018



## RESPECT FOR LANDSCAPE

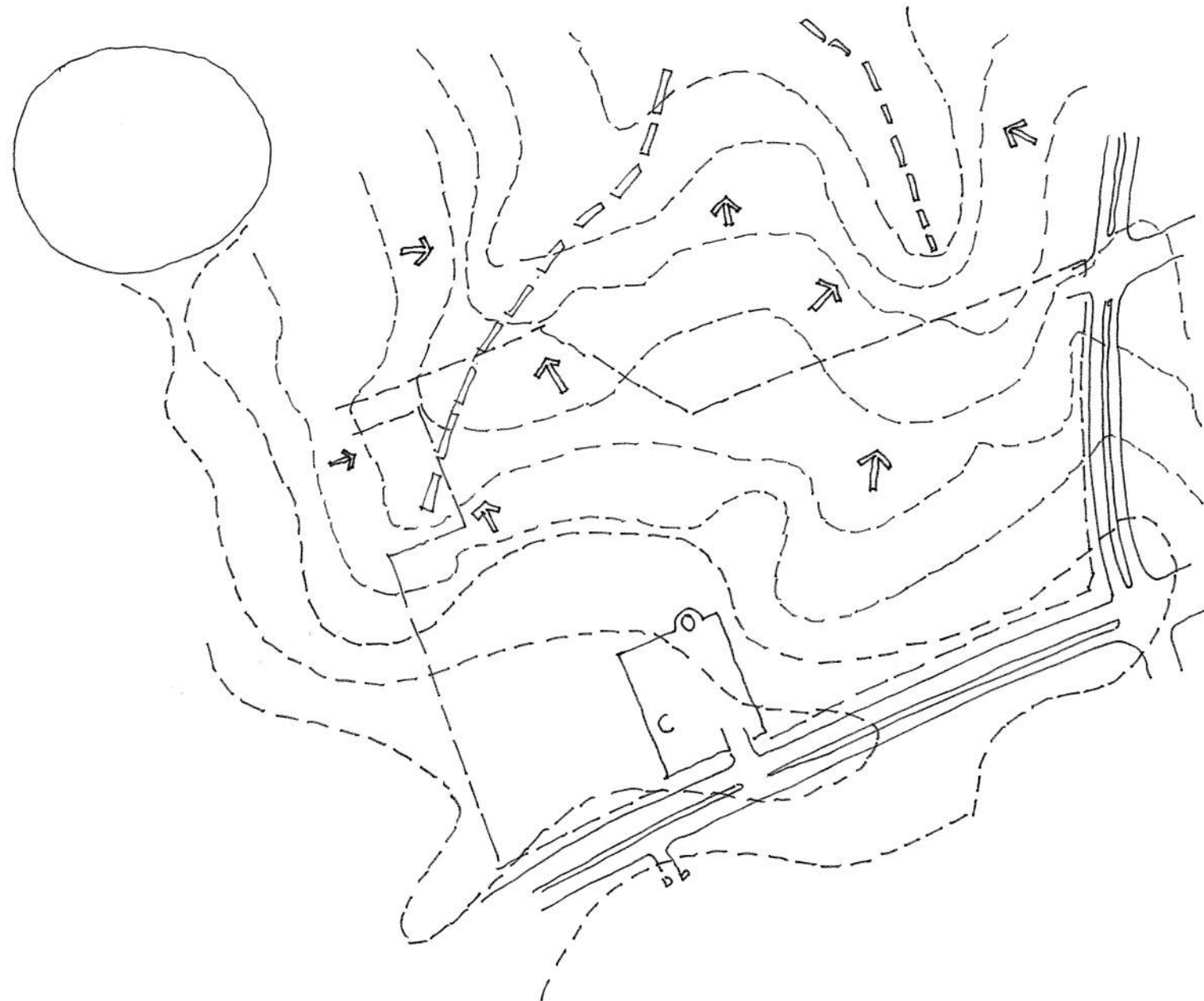
Campbelltown Road runs along a ridgeline with Bardia Barracks located at the highest part of the site. The site falls to the north towards the Edmondson Regional Park.

There are two main drainage lines that feed into the north of the site, a secondary ridge runs from Bardia Barracks north - south across the site.

The topography provides opportunities for vistas running down the north-south local streets providing views to the Regional Park.

The east-west roads can follow the topography.

The natural draining courses can inform the location of open space within the site.



## TOPOGRAPHY, HYDROLOGY & VEGETATION

URBAN DESIGN REVIEW - PRECINCT 3 EDMONSON PARK

18\_029  
REV A 19-07-2018

[www.smithtzannes.com.au](http://www.smithtzannes.com.au)

SD-A-004

## KEY THEMES AND DEVELOPMENT PRINCIPLES

The concept masterplan for the site is structured around the key themes and general best practice urban design principles to create a compact, safe and well connected community that also responds closely with the site and its natural and cultural features.

### 1. East - West Road

Provides a physical connection between the town centre and recreation area. It bends to respond to the natural drainage line but also bring people closer to the cultural heart of site - Bardia Barracks.

### 2. Cultural and community heart

Provide a neighborhood centre along the original 'social' axis of the site the north-south promenade - aligned with the war memorial this places the new cultural heart in the same area as the original mess hall and lecture buildings the main cultural heart of the barracks. The small retail area will serve the immediate community and also connect to the proposed community uses of Bardia Barracks. The retail area could also contain live-work studios that could contain artist in residents or small home businesses.

### 3. North south local roads

North- south orientated local roads traverse the topography providing a visual connection to the Regional Park

### 4. Greenway and alignment with barracks

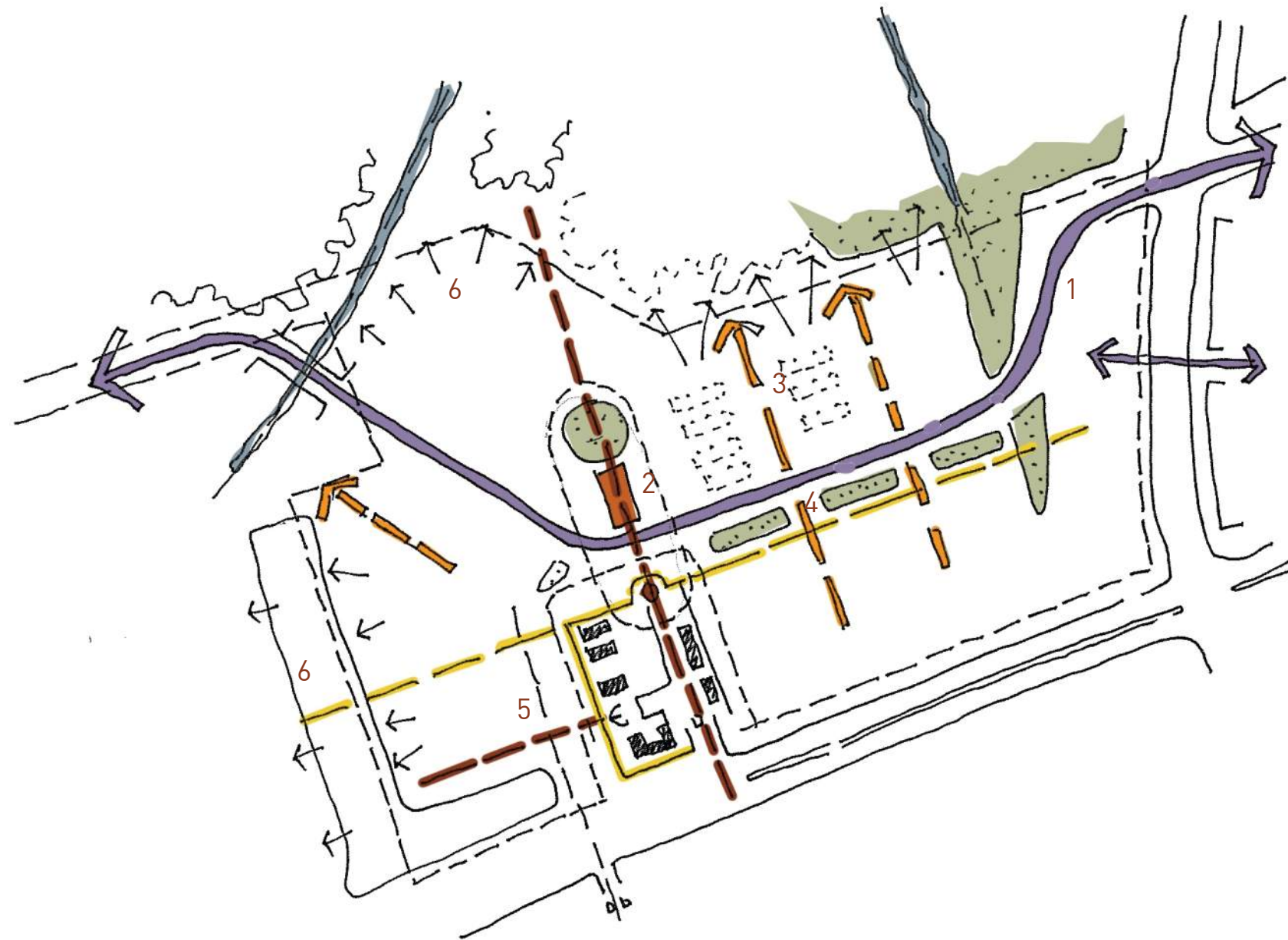
The alignment at the rear of the barracks creates a linear park along the east west road - creating opportunities for large tree planting and small pocket recreation space to serve the needs of the immediate community. This also continues the theme of the 'greenway' from the 'Frasers site'

### 5. Alignment to memorials

The memorial create defining axis that generate from Bardia Barracks

### 6. Connections to open space

Create physical and visual connections to the recreation space and regional park along the perimeter of the site



## CONCEPT MASTERPLAN

URBAN DESIGN REVIEW - PRECINCT 3 EDMONSON PARK

18\_029

REV A 19-07-2018

www.smithtzannes.com.au

SD-A-005





## MASTERPLAN

URBAN DESIGN REVIEW - PR.  
18\_029  
REV A 19-07-2018

[www.smithtzannes.com.au](http://www.smithtzannes.com.au)

SD-A-006





#### DWELLING MIX

<span style="display:inline-block; width:10px; height:10px; background-color:darkred; border:1px solid black;"></span> Apartments	99
<span style="display:inline-block; width:10px; height:10px; background-color:yellow; border:1px solid black;"></span> Stacked terraces	144
<span style="display:inline-block; width:10px; height:10px; background-color:lightyellow; border:1px solid black;"></span> Garden maisonettes	153
<span style="display:inline-block; width:10px; height:10px; background-color:tan; border:1px solid black;"></span> Terraces & fonzie flats	41
<span style="display:inline-block; width:10px; height:10px; background-color:brown; border:1px solid black;"></span> Manor houses	10 (40%)
<span style="display:inline-block; width:10px; height:10px; background-color:purple; border:1px solid black;"></span> Shop top housing apartments	42
<b>TOTAL</b>	<b>519</b>

Retail space 1200m<sup>2</sup>

## MASTERPLAN - TYPOLOGY

URBAN DESIGN REVIEW - PRECINCT 3 EDMONSON PARK

18\_029

REV A 19-07-2018

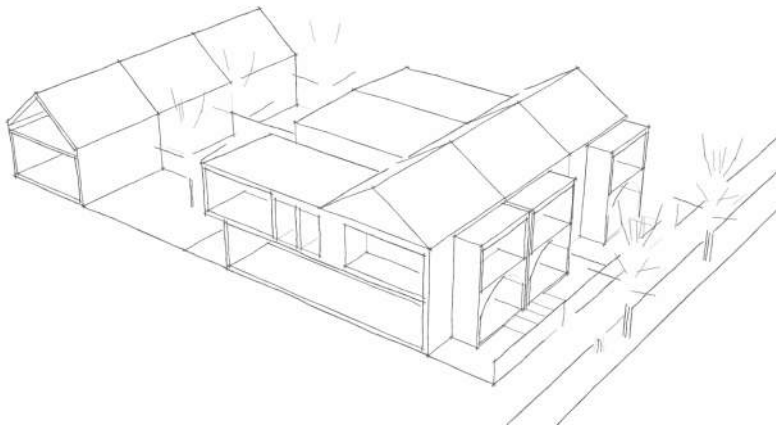
[www.smithtzannes.com.au](http://www.smithtzannes.com.au)

SD-A-007



The masterplan provides for a variety of different housing types. The types are distributed across the masterplan area to provide housing diversity for different budgets and household requirements. The distribuion is also a response to the locational characteristics of the site and the conceptual layout.

TERRACES WITH FONZIE FLATS

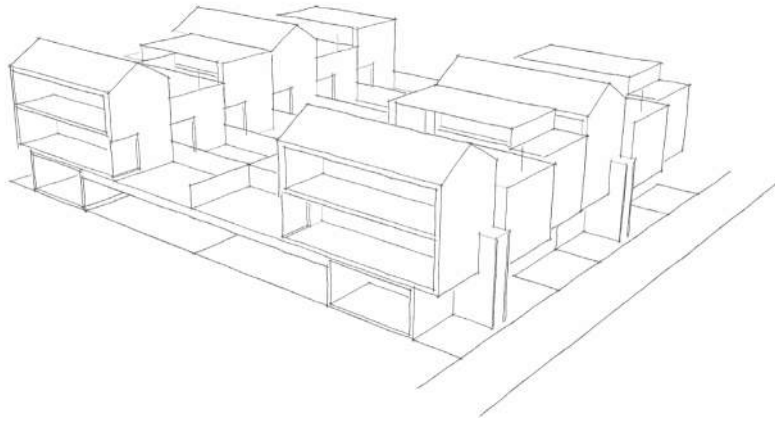


Two storey forms comprising traditional terraces houses with parking located in garages off a rear lane. Studio apartments are located above selected garages to provide activation of the laneway and affordable small scale accommodation

Typically 3 or 4 bedrooms around 130m²



GARDEN MAISONNETTES



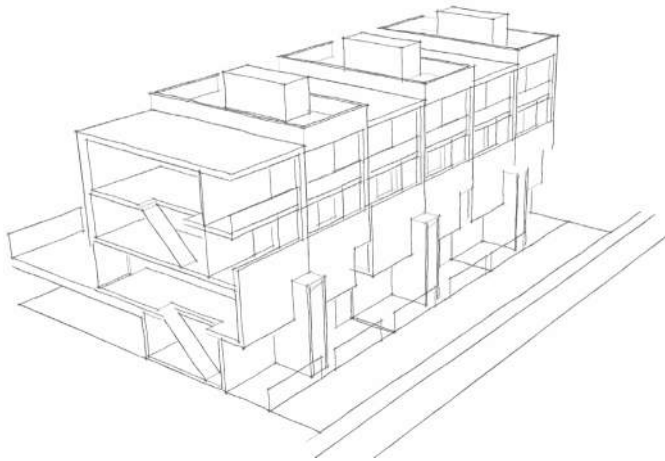
One, two and three storey dwellings around overlap in a terrace style format. This building form provides the independance of a terrace house and access to a large courtyards in a building with the efficiency of a small apartment building. Parking is located in a semi-basement / podium car park.

The height and scale of the building varies to create a interesting roof formthat can reflect the history of the site.

Mix of 1 bed (50m²), 2 bed (90m²) or 3 bed (105m²)



STACKED TERRACES



A terrace on the ground or one in the sky? High efficency urban form buildings. The narrow width provides great cross ventilation and good daylight access. Car parking in podium / semi-basement car park.

This form defines the street, and the internal spaces feel large and like separte terrace houses.

Typically two bedroom - 85m²



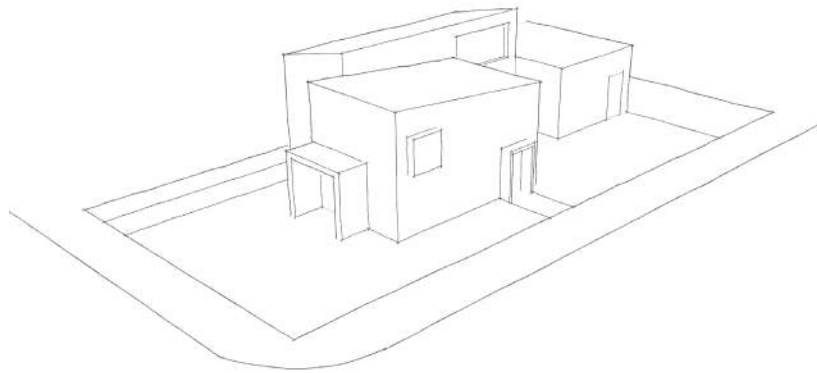
MASTERPLAN - DWELLING TYPOLOGY

URBAN DESIGN REVIEW - PRECINCT 3 EDMONSON PARK

18\_029  
REV A 19-07-2018

www.smithtzannes.com.au

## MANOR HOUSES

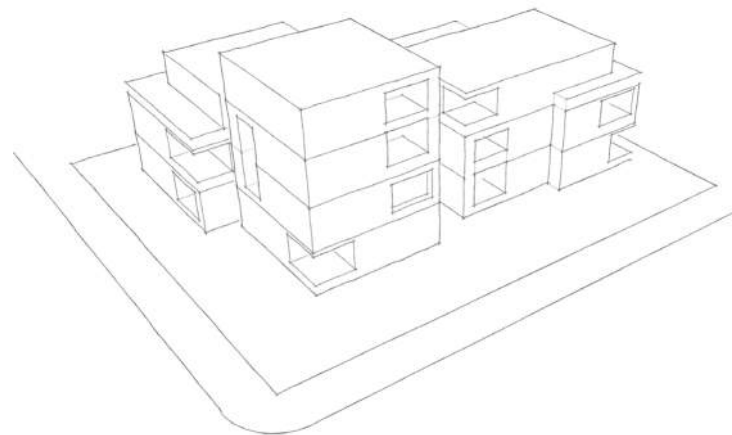


Small, compact and affordable - great for young people or older couples that might want a small garden in a community atmosphere. A group of 3 or 4 dwellings on a mid size lot.

Can be a mix of 1 (50m<sup>2</sup>), 2 (80m<sup>2</sup>) and 3 (95m<sup>2</sup>) bedroom dwellings



## APARTMENTS

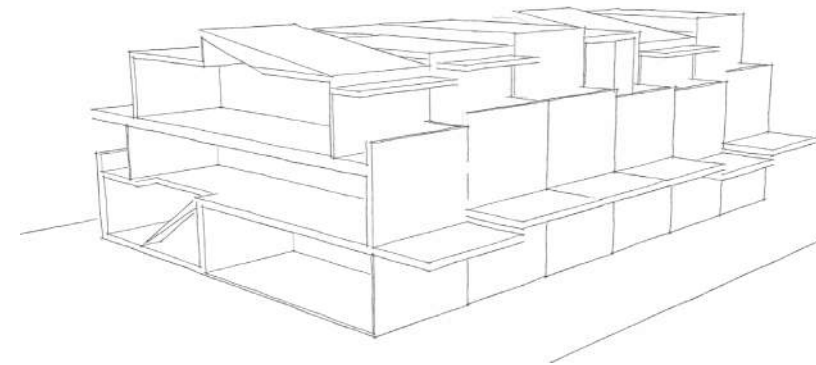


Two forms of apartments are proposed;

- NORTH WEST RESERVE VIEWS: Small simple affordable stack apartments. Mix of 1 (50m<sup>2</sup>) and 2 bedrooms (75m<sup>2</sup>). Same floor plate repeats
- CAMPBELLTOWN ROAD ENTRY - 5 storey apartment building around multiple core - large balconies. 1 (50m<sup>2</sup>), 2 (80m<sup>2</sup>) and 3 bed (100m<sup>2</sup>) - a 'landmark' at the corner.



## SHOP TOP HOUSING - NEIGHBOURHOOD CENTRE



The neighbourhood centre. Small scale retail on the ground floor with apartments above. Accessed from the rear are live/work studios that connect to the apartment above - ideal for small professionals and arts and creatives.

Built form to have a fine grain character - like an old main street - with slightly varying floor heights and articulation to give character

2 storeys of apartments over ground floor retail / workspaces (1 bed 50m<sup>2</sup>)



## MASTERPLAN - DWELLING TYPOLOGY

URBAN DESIGN REVIEW - PRECINCT 3 EDMONSON PARK

18\_029

REV A 19-07-2018

www.smithtzannes.com.au

SD-A-009



## OVERALL MASTERPLAN

URBAN DESIGN REVIEW - PRECINCT 3 EDMONSON PARK

18\_029  
REV A 19-07-2018

[www.smithtzannes.com.au](http://www.smithtzannes.com.au)

SD-A-010

