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By email: Emily.Dickson@planning.nsw.gov.au

Dear Ms Dickson,

Re: Edmondson Park South Concept Plan – Precinct 3 (MP10_0118 MOD 10)

Liverpool City Council was invited to provide comments on a request for SEARs for a proposed modification (Mod 10) to the Edmondson Park South Concept Plan – Precinct 3 (MP10_0118 MOD 10).

The amendment seeks to increase the number of lots yielded in Edmondson Park South (Precinct 3). This will result in increasing the precinct plan yield from 4,502 dwellings to 4,852 dwellings, representing an increase of 350 dwellings. The modification will also include a revised ILP, and changes to other planning controls, which will prevail to the extent of any inconsistency with the SEPP and DCP.

The modification to the concept plan represents a divergence from the original concept plan. To ensure that the impacts of this modification are realised, Council requests that the Department takes the advice attached to this letter into consideration when preparing SEARs.

If you have any questions please contact Ian Stendara, Executive Planner on 8711 7511.

Yours sincerely,



Charles Wiafe
A/Manager Planning & Transport Strategy

Council has reviewed the Draft SEARs and provides the following comments in relation to each item that the proponent must address.

1. Statutory and strategic context

It is understood that the original concept plan (MP10_0118) provided an approximate dwelling yield count which came to be accepted as the precinct maximum dwelling yield. Council staff acknowledge the benefits of locating higher dwelling densities in close vicinity to neighbourhood centres and mass transit stations. This will encourage greater use of public transport, allow more residents to live within walking distance of shopping and commercial uses, and offer a greater variety of dwelling configurations to suit multiple household compositions.

However, with the original concept plan's estimated residential dwelling yield came assumptions of residential population and the required infrastructure to support this density. As with previous modifications, there will be a need to undertake a review of planned infrastructure to identify any additional requirements resulting from the proposed uplift. The reports prepared to address key issues 2, 4, 6, 9, 10, 14, 17, 18, and 21 shall adequately assess the impacts (and any mitigation) of this change in anticipated yield.

Of the key issues to be addressed by the proponents EA, Council recommends item 1 (statutory and strategic context) includes additional provisions, being:

- 1) Indicate consistency with LCC strategic plans, including 'Our home, Liverpool 2027', 'Connected Liverpool 2040' Local Strategic Planning Statement (LSPS), and the 'Liverpool Local Housing Strategy 2020'.
- 2) The EA must address any changes to outline how it provides for a diversity of housing, and the modification's alignment with the district plan's affordable housing targets.

4. Built Form and Urban Design

Given the site's proximity to a mass transit stop, nature conservation area, and cluster of European heritage items, Council sees it fit that the context and interface with these elements be particularly addressed in the urban design plans. Given the urban context of the development site, an urban design strategy should emphasis pedestrian friendly streets and opportunities for place-making.

Of the key issues to be addressed by the proponents EA, Council recommends item 4 (Built form and urban design) includes additional provisions, being:

- 1) Identify key interfaces and identify how the proposed changes enhance the relationship with the broader environmental and development context;
- 2) Identify how any changes in the proposed street layout will affect connectivity to/from and through the precinct;
- 3) How the additional dwellings will affect built form and scale, and articulate whether the changes will alter how the built form interfaces with surrounding environmental lands and developments.

- 4) Identify key changes in built form and scale, including:
 - a) Building/block locations and siting;
 - b) Changes to scale, size, and overall height of buildings; and
 - c) Demonstrate consistency with best practice outcomes for built form, with respect to the various typologies proposed.
- 5) Identify key changes to proposed street alignments, and the resulting changes in built-form-and-open space relationships.
- 6) Identify where opportunities for flexible usage may be applicable, providing for home office, home-based business, and other civic uses.

5. Visual Impacts

The urban framework provided by MG Planning appears to seek retention of view corridors to/from the Ingleburn barracks, for which Council staff are supportive. The interface with the nature conservation area to the north should also be treated appropriately. As part of developing the heritage management and urban design strategies, further opportunities for integrating these elements into the development should be explored.

Of the key issues to be addressed by the proponents EA, Council recommends item 5 (Visual impacts) includes additional provisions, being:

- 1) Indicate and demonstrate key vistas and visual experiences that the precinct can include, and how these outcomes can be achieved.
- 2) Indicate the visual impacts that development will have on the existing features of the precinct, including existing structures and heritage/historic sites.

6. Public Space

Of the key issues to be addressed by the proponents EA, Council recommends item 6 (Public space) includes additional provisions, being:

- 1) Demonstrate that pedestrian access to and from dwellings and key public spaces and amenities is aligned with best practice outcomes, including the 'Guide to Movement and Place (GA NSW), and Healthy Streets Index and indicators (<https://healthystreets.com/>);
- 2) Demonstrate that the size and types of public spaces proposed are appropriate for the precinct and will add to the experiential value for residents and visitors, and that they are considered within the broader context of other nearby existing spaces and proposed developments. This should detail (but not be limited to):
 - a) The total site area,
 - b) The area of public open space,
 - c) The area of private / communal space,

- d) The standards used to determine the quantum of open space required (the proponent should note the Liverpool Council Recreation, Open Space and Sports Strategy 2018-2028 2.83ha/1,000 persons, and the WHO guidelines for urban areas 10sqm/person); and
- 3) Identify public domain areas that may be suitable for adjunct activities, such as street fairs and markets, pop-up events, and other events involving public gatherings, and demonstrate these scenarios through diagrams, drawings, and/or relevant imagery.

The provisions above should also be reflected in any proposed changes to traffic circulation and street designs (including cross-sections and plans).

7. Landscaping and trees

Of the key issues to be addressed by the proponents EA, Council recommends item 7 (Landscaping and trees) demonstrate that resilience has been considered in the selection and placement of landscape elements, with respect to potential environmental threats and sustainability initiatives.

9. Development contributions and public benefit

An additional 350 dwellings could provide for another 1,000 or so residents, for which the contributions plan (as a local infrastructure strategy) did not envisage. The proponent must demonstrate to Council that the impacts to the provision of local infrastructure (including cumulative impacts) have been understood and prepare a means to enhance the supply of public infrastructure.

Of the key issues to be addressed by the proponents EA, Council recommends item 9 (Development contributions and public benefit) includes additional provisions, being:

- 1) Analysis of the infrastructure required to support the additional development yield,
- 2) Identification of relevant state and local infrastructure that requires upgrade or augmentation, and
- 3) Options for delivery mechanisms for any increased infrastructure provision.

10. Transport, traffic, parking and access (operation and construction)

Of the key issues to be addressed by the proponents EA, Council recommends item 10 (Transport, traffic, parking and access) includes additional provisions, being:

- 1) A cumulative traffic and transport impact assessment is prepared in relation to the proposed development and other planned developments within Edmondson Park South including MOD 5. It shall address the existing and future transport infrastructure, in consultation with Council and Transport for NSW.

A meeting is to be held between TfNSW, Council and the applicant to discuss study methodology, transport modelling assumptions, and an update of the previous AIMSUN and SIDRA models developed for the Edmondson Park South

to assess the cumulative impacts of this modification and other planned developments in the precinct.

- 2) On-site car parking rates should be provided in accordance with the Council's DCP and the relevant site specified guideline.
- 3) Identify measures to integrate the development with the transport network, including road improvement works required to accommodate the proposed development, including bicycle facilities, active transport network, pedestrian crossing facilities and traffic calming devices; and
- 4) A Green Travel Plan is to be prepared or updated for future developments in Edmondson Park South to identify transport options to encourage sustainable transport modes. The plan is to be prepared by a suitably qualified transport consultant in consultation with Transport for NSW (TfNSW) and Council.

The plan is to include the following (but not being limited):

- a) Objectives and set future travel mode share targets, particularly for any car trips or on-site parking space reduction as specified in the transport impact assessment report;
 - b) Detail the existing transport options to and from a place;
 - c) Detail any travel demand management strategies, actions and an implementation plan to encourage greater usage of public transport and active transport modes;
 - d) Measures to promote and support the implementation of the plan, including incentives, human resource requirements, roles and responsibilities for implementing the plan; and
 - e) Detail the methodology, monitoring, review and reporting to measure the effectiveness of the objectives and mode share targets of the GTP, including the timeframe of monitoring and the requirement for travel surveys to identify travel behaviour changes of users of the development.
- 5) A drawing of the key pedestrian and cycle route network within and around the development precinct indicating connections with any existing and future elements including transit nodes, public spaces, key civic spaces, major roads, environmental lands, and neighbouring precincts.
 - 6) A drawing of the road network within and around the development precinct indicating interface with pedestrian and cycle routes, key publicly accessible facilities, civic spaces, shopping areas, transit nodes, public car parking, and connections with major arterial roads and adjoining precincts; and

- 7) Identify service vehicle access routes for retail and service areas within the precinct, and connection to arterial roads.
- 8) Provide an indicative street and road hierarchy, indicating street widths, key urban design elements, adjacent ground-level land-uses and features.
- 9) Provide details as to how the development will cater for persons with disability including aspects such as: disabled parking, ramps, way finding & signage, tactile markers in key public spaces (including towards the train station / bus interchange).

11. Ecologically Sustainable Development (ESD) and climate change

Of the key issues to be addressed by the proponents EA, Council recommends item 11 (ESD and climate change) includes additional provisions, being:

- 1) Demonstrate alignment with the 'Greener Places' framework (GA NSW);
- 2) Demonstrate mitigation tactics for urban heat island effect, showing quantitative justification and environmental modelling.
- 3) Indicate opportunities for precinct-wide sustainable initiatives and practices that may be appropriate for inclusion in the precinct; and
- 4) Demonstrate that resilience has been considered in the design of the precinct, with respect to potential environmental threats and sustainability initiatives.

12. Contamination

In accordance with Clause 7(1) of *State Environmental Planning Policy (SEPP) No. 55- Remediation of Land*, the consent authority is required to consider contamination and the need for remediation when determining an Application. If the land requires remediation, it must be satisfied that the land will be remediated before the land is used for that purpose. Furthermore, Clause 7(2) of *SEPP 55- Remediation of Land* requires the consent authority to consider a report specifying the findings of a preliminary investigation of land if the proposed development involves a change of use on any land specified in subclause 4.

With consideration for subclause 4 of *SEPP No. 55- Remediation of Land*, the Applicant intends to carry out development for residential purposes. It is understood that the land was previously used by the Department of Defence to train the Australian Army. Table 1 of the contaminated land planning guidelines identifies defence works as a potentially contaminating activity. It is noted that the draft SEARs will require the Applicant to assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable for the proposed use in accordance with *SEPP No. 55- Remediation of Land*. Further to these requirements, it is recommended that the Proponent is required to undertake a hazardous materials survey of any remaining structures and infrastructure as part of the site assessment.

To facilitate the change of use, it would be necessary for the Applicant to engage the services of a suitably qualified environmental consultant to prepare a Stage 1- Preliminary Site Investigation for the land. The Preliminary Site Investigation shall comply with applicable guidelines made or approved by the NSW EPA under the

Contaminated Land Management Act 1997 and identify all past and present potentially contaminating activities; identify potential contamination types; discuss the site condition; provide a preliminary assessment of site contamination; and assess the need for further investigations.

The Department shall consider whether further investigations comprising an assessment of unexploded ordnance (UXO) and materials of military origin are required by specialist consultants. In this regard, the Department may require the Applicant to provide written advice from a suitably qualified consultant experienced in the assessment and remediation of land affected by military activities. The consultant shall confirm whether an ordnance investigation, hazard analysis or geophysical survey are required for the land.

Where contaminating activities are suspected or known to have occurred, or if site history is incomplete, it may be necessary to prepare a Stage 2- Detailed Site Investigation. This investigation shall give regard to the potential effects of any contaminants on public health, the environment and building structures and shall meet the sampling density outlined in the NSW EPA Contaminated Sites Sampling Design Guidelines (1995).

If the Stage 2-Detailed Site Investigation indicates that the site poses unacceptable risks to human health or the environment, a Remedial Action Plan (RAP) shall be prepared by a suitably qualified environmental consultant in accordance with applicable guidelines made or approved by the NSW EPA under the *Contaminated Land Management Act 1997*. In these circumstances, the Remedial Action Plan shall be referred to the consent authority for review.

In accordance with Council's requirements, it is strongly recommended that contaminated site reports are prepared or reviewed and certified by a suitably qualified environmental consultant who is certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme.

Please note that it is the responsibility of the consent authority to consider the requirements of Clause 7 of *SEPP 55- Remediation of Land* prior to granting consent to any development on the land.

12. Site Audit Statement and Site Audit Report

It is recommended that the Department requires a site audit to confirm that sufficient information is available to address the statutory requirements of *SEPP No 55- Remediation of Land*. In this regard, a Section B Site Audit Statement and Site Audit Report prepared by an NSW EPA Accredited Site Auditor shall be submitted to the consent authority for review and approval confirming that:

- The nature and extent of contamination has been appropriately determined at the proposed development site;
- The investigation, remediation or management plan is appropriate for the intended purpose; and
- The site can be made suitable for the proposed land use in accordance with the submitted Remediation Action Plan (if required).

13. Aboriginal and cultural heritage

Of the key issues to be addressed by the proponents EA, Council recommends item 13 (Heritage) includes additional provisions, being:

- 1) The Aboriginal Cultural Heritage Assessment Report should reference the draft 'Connecting with Country' framework (GA NSW).
- 2) Preparation of the Heritage Impact Statement should consider the conservation management plan of the Bardia Barracks, including an assessment as to any visual impacts from the proposed development in relation to the item.

14. Stormwater drainage and water quality

Of the key issues to be addressed by the proponents EA, Council recommends item 14 (Stormwater drainage and water quality) includes an additional provision, being:

- 1) The site is likely be impacted by overland flooding. The tributary of Maxwell Creek originates from this site. An overland flood study and flood impact assessment demonstrating no adverse impact of flooding due to the proposed development to adjoining properties and roads for up to the 1% AEP storm event shall be included.

15. Noise and vibration

The proposal is likely to be a traffic generating activity and may be a source of offensive noise. The Applicant shall be required to engage the services of a suitably qualified acoustic consultant to prepare a comprehensive acoustic assessment of all noise and vibration generating activities associated with the proposal and outline measures to minimise and mitigate potential noise and vibration impacts on surrounding occupiers.

The acoustic report shall take into consideration all applicable guidelines including the Interim Construction Noise Guideline (ICNG) (DECC, 2009), NSW EPA's Noise Policy for Industry (2017), NSW Road Noise Policy (RNP) (EPA, 2011) and Department of Environment and Conservation (DEC) Assessing Vibration: A Technical Guideline (DEC 2006).

In addition to the requirements prescribed by the draft SEARs, existing noise generating activities in the local area and their impact on future residential receivers must be considered. AS/NZS 2107:2016 "Acoustics - Recommended design sound levels and reverberation times for building interiors" (AS/NZS 2107:2016) may offer additional guidance relating to noise and reverberation design criteria within building interiors to ensure a healthy, comfortable, and productive environment for future residents.

18. Social Infrastructure Assessment

Of the key issues to be addressed by the proponents EA, Council recommends item 18 (Social Infrastructure Assessment) includes an additional provision, being:

- 1) Information be provided on how the demand for social infrastructure was determined, including:
 - a) The standards used to determine the requirements,
 - b) A demographic and social needs gap analysis,
 - c) Details on the delivery model of any infrastructure,
 - d) Details on the estimated time frame for delivery, and
 - e) Relating to item 6, details of any place which can hold community events
- 2) Section 27, Part 1 of Liverpool Council Development Control Plan 2008 includes triggers for the submission of a social impact comments. Residential flat buildings of greater than 250 units need to submit a comprehensive social impact assessment. Council's Social Impact Assessment Policy & Guidelines provides further information to prepare a SIA.
- 3) The EA should include details as to how the development caters for those with physical or sensory disabilities. This includes the quantum of accessible dwellings/units provided (and the standards for which they meet), as well as public domain aspects of the development, such as sensory gardens, adjustable seating, and tactile pavements. The EA should address the Liverpool City Council Disability Inclusion Action Plan 2017-2021.
- 4) The EA should provide details as to the dwelling mix, including:
 - a) Anticipated dwelling typologies.
 - b) Any dwellings to be delivered as per the Seniors Housing SEPP 2004,
 - c) Any dwellings to be delivered as per the Affordable Rental Housing SEPP 2009,
 - d) Number of accessible dwellings.