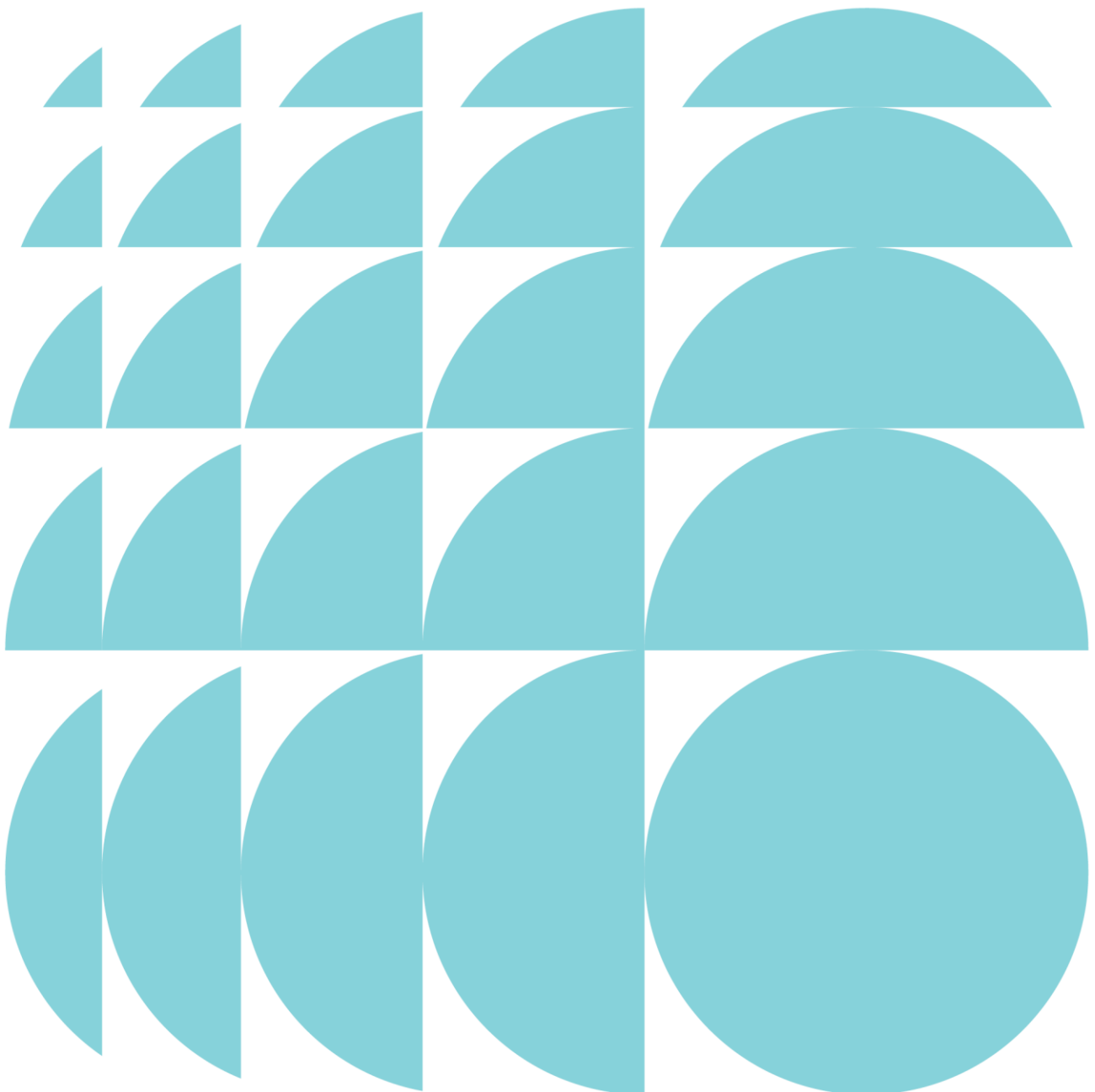


Section 75W Modification Application
Ed. Square – Town Centre West School and RP3
Apartments Modification (MOD 12)

Submitted to Department of Planning, Industry and
Environment

On behalf of Frasers Property Australia

2 December 2021 | 218133



CONTACT

Michael Rowe Director mrowe@ethosurban.com 0403 043 345

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This document has been prepared by:



Jacob Dwyer

This document has been reviewed by:



Chris McGillick

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Ethos Urban Pty Ltd
ABN 13 615 087 931.
www.ethosurban.com
173 Sussex Street, Sydney
NSW 2000 t 61 2 9956 6952

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- F** Ed. Square Height and Gross Floor Area Maps
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- I** Waste Management Plan
SLR
- J** Bushfire Protection Assessment
Peterson Bushfire

1.0 Introduction

This Environmental Assessment Report (EAR) has been prepared by Ethos Urban on behalf of Frasers Property Australia (Frasers) in support of a Section 75W Modification Application pursuant to clause 3C, Schedule 2 of the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017* (Savings and Transitional Regulation) to modify Concept Plan Approval MP 10_0118, as it applies to the Edmondson Park Frasers Town Centre being developed by Frasers (now known as 'Ed. Square').

The Modification Application seeks to facilitate the future development of a new required NSW Department of Education secondary school in the North-West Quadrant of the Town Centre. The school will deliver important infrastructure to serve the growing population of the local area in a highly accessible location. Its integration into the town centre also reflects Fraser's on-going commitment to make Ed Square the benchmark for mixed use places. The introduction of the school will necessitate relocation of approved residential apartments out of the Town Centre Core to the Residential Precinct 3 Stage 9 (now known as the 'High Density Residential Precinct'), with no additional dwellings proposed beyond the currently approved total yield. Specifically, it seeks to make the following modifications to the Concept Plan:

- Amend the Ed. Square Design Guidelines (Design Guidelines) to:
 - Update the vision, principles, key elements and urban structure to reflect the introduction of the school and new relocated High Density Residential Precinct.
 - Provide design guidance for future development of the school and the High Density Residential Precinct.
- Introduce the Ed. Square Public Domain Plan – Town Centre West and RP3 Modification 12 (Public Domain Plan) to guide the future design of public domain relating to:
 - Town Square West (an extension of the existing town square through Town Centre West).
 - The school in the North-Western Quadrant.
 - The High Density Residential Precinct.
- Introduce maximum Gross Floor Area (GFA) and building heights to the High Density Residential Precinct.
- Amend the existing maximum height and GFA for the Town Centre Core Quadrants to accommodate the school.
- Corresponding amendments to the conditions of approval as required to accommodate the above changes.

This EAR describes the site, its environs, and provides an assessment of the proposed modifications in the context of the approved Concept Plan. It should be read in conjunction with the following supporting documentation appended to this report (see table of contents).

2.0 Consent proposed to be modified

2.1 MP 10_0118 approval

In March 2010, Landcom (subsequently UrbanGrowth NSW, now known as Infrastructure NSW) lodged a Concept Plan (MP 10_0118) and concurrent Project Application (MP 10_0119) for the development of the Edmondson Park South precinct, pursuant to Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The Concept Plan was approved by the Planning Assessment Commission (PAC) on 18 August 2011. The extent of the Edmondson Park South precinct and the approved concept plan is shown in **Figure 1** below.

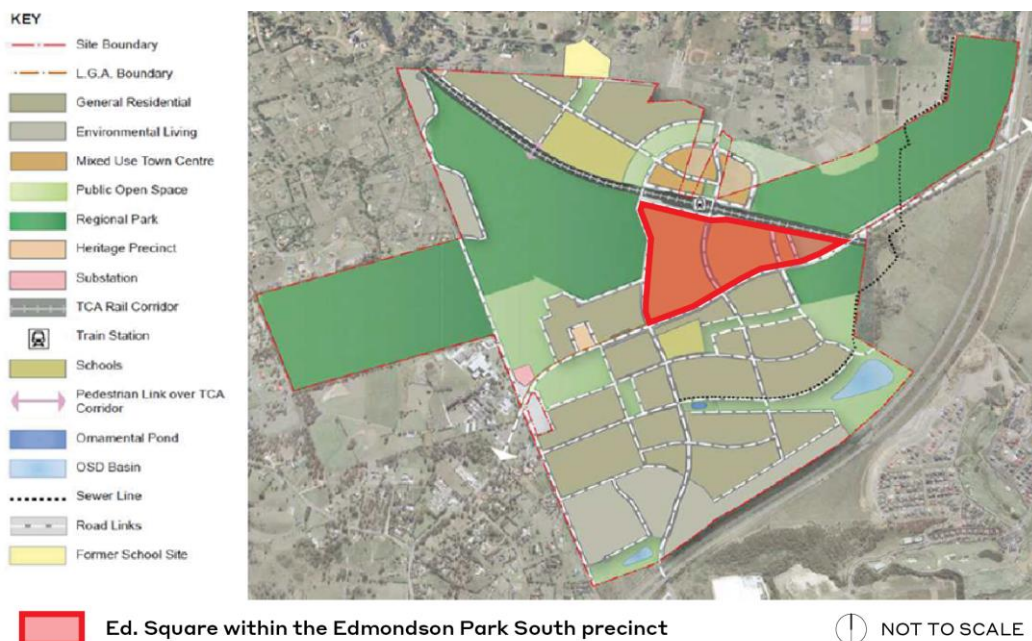


Figure 1 The Edmondson Park South precinct and Frasers (Ed. Square) site

Source: Landcom

To facilitate the orderly development of the Edmondson Park South precinct as envisaged under the Concept Plan, the precinct was listed under Appendix 16 of *State Environmental Planning Policy (State Significant Precincts) 2005* (the SSP SEPP). The SSP SEPP zones the Edmondson Park site whilst providing maximum building height, Floor Space Ratio (FSR) and minimum lot size development standards, as well as miscellaneous provisions.

2.2 Ed. Square

In August 2014, UrbanGrowth NSW (now Infrastructure NSW) started the tendering process for the development of the mixed use town centre within the Edmondson Park South precinct. In August 2015, it was confirmed that Australand (now Frasers) had been awarded the tender for the purchase and development of the southern part of the town centre to the south of the railway station, as highlighted in red in **Figure 1** above. This portion of the precinct being developed by Frasers is now referred to as Ed. Square (previously Frasers Town Centre). The Frasers Town Centre is described under Schedule 1, Part B of the MP 10_0118 consent as:

The land within the Edmondson Park Town Centre, south of the South West Rail Link but excluding the Transport for NSW commuter car park.

In March 2016, Frasers lodged a Section 75W Modification (Mod 4) to incorporate the winning concepts of the bid process with a number of consequential and related changes into the Concept Plan. As part of Mod 4, the Design Guidelines and Public Domain Plan were approved to guide the future built form, dwelling typologies and public domain outcomes of the Ed. Square site.

MOD 4 was approved by the Planning Assessment Commission on 12 October 2017, and comprised the following amendments:

- *introduce a maximum gross floor area limit of 145,025m² for the Town Centre Core;*
- *increase the maximum building height in the Town Centre Core from 30 m to 67.4m;*
- *increase the approximate number of dwellings within the Town Centre Core from 912 to 1884;*
- *introduce maximum car parking rates and change the road network; and*
- *introduce new design guidelines and a public domain plan.*

The Ed. Square design features a high density, mixed-use core in the north-west portion of the town centre, surrounded by Residential Precincts that provide medium density housing (**Figure 2**), providing a transition to the lower density residential dwellings further beyond and outside Ed. Square.

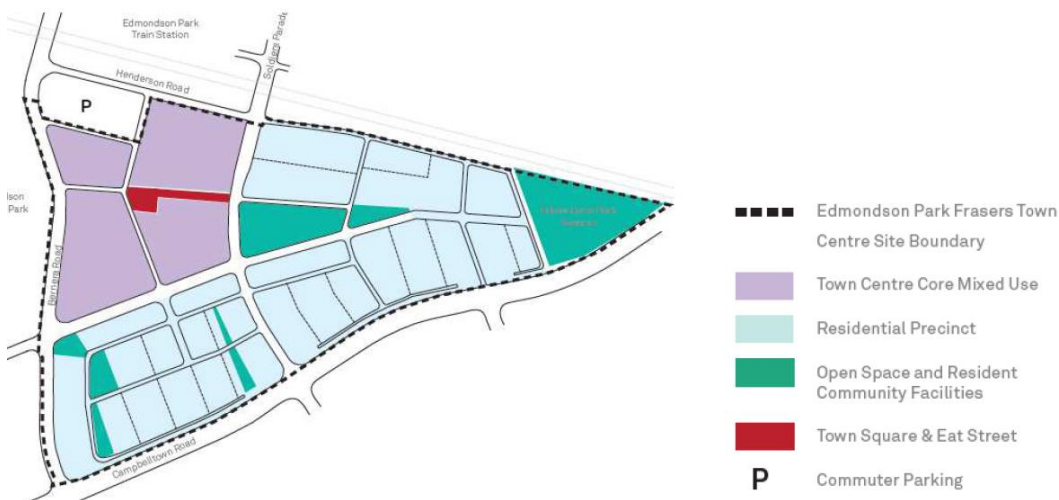


Figure 2 Ed. Square (Frasers Town Centre) Structure Plan (Mod 4)

Source: Edmondson Park Frasers Town Centre Design Guidelines

2.3 Mod 11

At the time of writing, the eleventh modification to the Concept Plan (Mod 11) was under assessment by DPIE. Mod 11 seeks to:

- Amend the Ed. Square Design Guidelines (Design Guidelines) to enable additional attached dwelling typologies within Residential Precincts 2 and 3;
- Introduce the Ed. Square Public Domain Plan – Residential Precincts Modification 11 (Public Domain Plan) to facilitate the new typologies and streetscape/open space amenity; and
- Incorporate a new condition of consent clarifying the design of drainage infrastructure.

It is expected that the modification to which this report relates (Mod 12) will be determined after Mod 11. As such, the documentation provided with this Modification Application includes the changes proposed in Mod 11 for a logical assessment.

To the extent of any inconsistency between MOD 11 and MOD 12, the changes proposed under MOD 12 will supersede MOD 11 (this only relates to Residential Precinct 3 – stage 9).

2.4 Part 3A repeal

As previously mentioned, the Concept Plan for the Edmondson Park South precinct was approved pursuant to Part 3A of the EP&A Act. On 1 October 2011, Part 3A was repealed by the NSW Government, however transitional arrangements were introduced to apply to approved Part 3A projects through the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017* (Savings and Transitional Regulation).

Under Schedule 2, Clause 2 (Transitional Part 3A projects) of the Savings and Transitional Regulation, the approved Concept Plan continues to have weight and force. Furthermore, Schedule 2, Clause 3B (Provisions applying with respect to approval of concept plans) reinforces the Concept Plan approval.

Section 75W continues to apply to Modification Applications to a Concept Plan approved before or after the repeal of Part 3A pursuant to Schedule 2, Clause 3C(1) of the Savings and Transitional Regulation.

2.5 Current site conditions and project status

Development within Ed. Square has been progressing gradually over the past several years. The development of the mixed-use Town Centre East, eat street and town square are now complete, as are the substantial elements of Residential Precinct 1. The Town Centre West, as well as Residential Precincts 2 and 3 are currently under design development by Frasers and will be subject to future development applications in accordance with this proposed Concept Plan modification. Refer to **Figure 3** for a recent aerial photograph which shows progress at the site.

This Section 75W Application relates primarily to the North-Western Quadrant of the Town Centre Core and Stage 9 of Residential Precinct 3 (as shown in **Figure 3** below). As part of this modification, the Residential Precinct 3 Stage 9 will be referred to as the High Density Residential Precinct.



Figure 3 Aerial photograph of Ed. Square showing current progress

Source: Terroir

3.0 Proposed modifications to the consent

This Modification Application seeks to facilitate the future development of a new required NSW Department of Education school in the North-West Quadrant of the Town Centre. The introduction of the school will necessitate relocation of residential apartments out of the Town Centre to the Residential Precinct 3 Stage 9 (now known as the 'High Density Residential Precinct'). Specifically, it seeks to make the following modifications to the Concept Plan, as follows:

- Amend the Ed. Square Design Guidelines (Design Guidelines) to:
 - Update the vision, principles, key elements and urban structure to reflect the introduction of the school and new High Density Residential Precinct.
 - Provide design guidance for future development of the school and the relocated High Density Residential Precinct.
- Introduce the Ed. Square Public Domain Plan – Town Centre West and RP3 Modification 12 (Public Domain Plan) to guide the future design of public domain relating to:
 - Town Square West (an extension of the existing town square through Town Centre West).
 - The school in the North-Western Quadrant.
 - The High Density Residential Precinct.
- Introduce maximum Gross Floor Area (GFA) and building heights to the High Density Residential Precinct.
- Amend the existing maximum height and GFA for the Town Centre Core Quadrants to accommodate a school.
- Corresponding amendments to the condition of approval as required to accommodate the above changes.

3.1 Background and key moves for Mod 12

Town Centre East is open and functioning as the heart of the Ed. Square community. Frasers are now seeking to progress the design and delivery of Town Centre West, which is essentially the second half of the Town Centre Core.

As further investigations and development of Town Centre West have progressed, and in discussions with the NSW Department of Education, the inclusion of a new high school in the Town Centre Core will complement the existing uses and strengthen the Town Centre's role as a cultural and civic hub for the community. Frasers have been selected through an expression of interest process as the preferred proponent to deliver the required High School in Edmondson Park. This process is subject to an RFP process in February 2022 with a target school launch in January 2025. As a result, Frasers now propose to include a new secondary school in the Town Centre Core.

Inclusion of a school in the Town Centre Core requires amendments to the Concept Plan to accommodate the high school under the Concept Plan. Notably, the school will displace some residential uses previously envisaged in the Town Centre Core and requires a re-think of how the public domain is laid out. As a result, this modification is essentially underpinned by three key moves:

1. Introduce a school in the North-West Quadrant.
2. Introduce Town Square West, an extension of the existing Town Square through Town Centre West.
3. Relocate the displaced residential dwellings into Stage 9 of Residential Precinct 3.

The key moves described above are shown graphically in **Figure 4** and the resulting indicative configuration of the Town Centre is shown at **Figure 5**.

This modification seeks to implement the above by amending the Design Guidelines (**Appendix A**) and the Public Domain Plan (**Appendix B**). It has been informed by an Illustrative Design Scheme (**Appendix D**) and Urban Design Report (**Appendix C**), which are described at **Section 3.2**. The Illustrative Design Scheme and Urban Design Report have been updated to respond to the above key moves and provide built form testing of the Concept Plan as it is proposed to be modified. A description of the design thinking behind the Concept Plan Modification and the Illustrative Design Scheme is provided in the following sections.

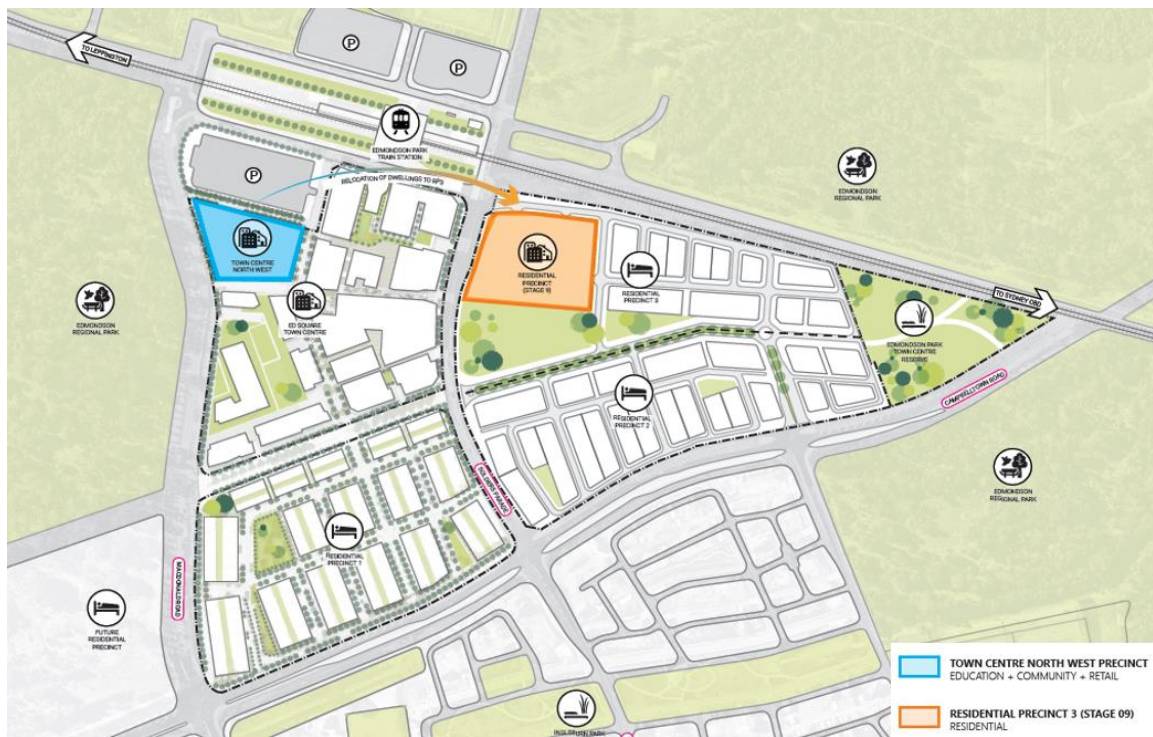


Figure 4 Indicative displacement of residential apartments as a result of the school

Source: Terroir/Plus

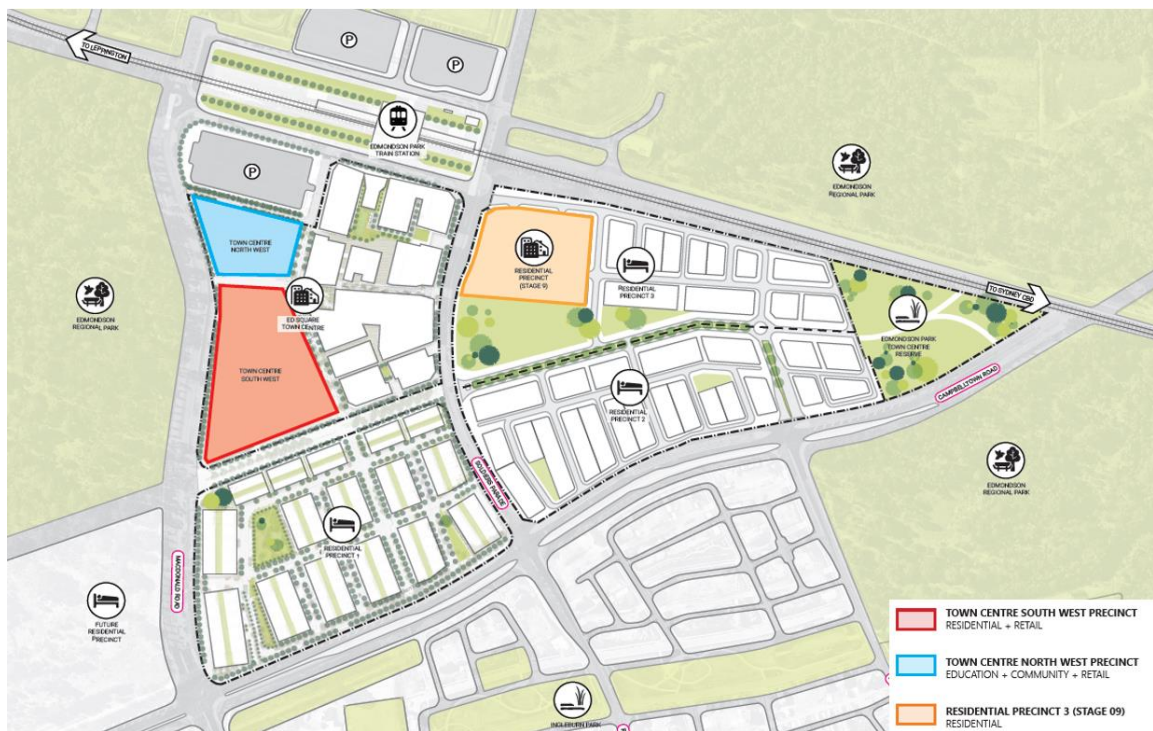


Figure 5 Indicative layout of Town Centre showing school, high density residential and South-West Quadrant

Source: Terroir/Plus

3.1.1 Locating the School

It is proposed that the school be located in the North-West Quadrant of the Town Centre Core. The location was chosen for the following reasons (as shown at **Figure 6**):

- It has excellent accessibility and views to the Edmondson Park Regional Park.
- It is close to Edmondson Park Train Station.
- It can offer a highly visible public “front door” to the school from Sergeant Street (Main Street).
- The North-West Quadrant is the best sized lot that can integrate the school into the Town Centre Core, but still function as a standalone use.
- It provides an opportunity to improve solar access to the proposed Town Square West.
- It is within the undeveloped Town Centre West and will complement the range of uses that exist in Town Centre East and that are proposed for the South-West Quadrant.
- It provides an opportunity to integrate with other community uses to form a civic heart of the Town Centre.
- It provides an opportunity to extend the existing Town Square through the Town Centre West.

The Illustrative Design Scheme provides an indicative massing and layout for the North-West Quadrant. As shown at **Figure 7**, there is an opportunity for the school to be located in the northern portion of the quadrant, which maximises solar access to Town Square West. There is also an opportunity for the school to be integrated with other community uses and retail uses, activating and interfacing with Town Square West and the South-West Quadrant.

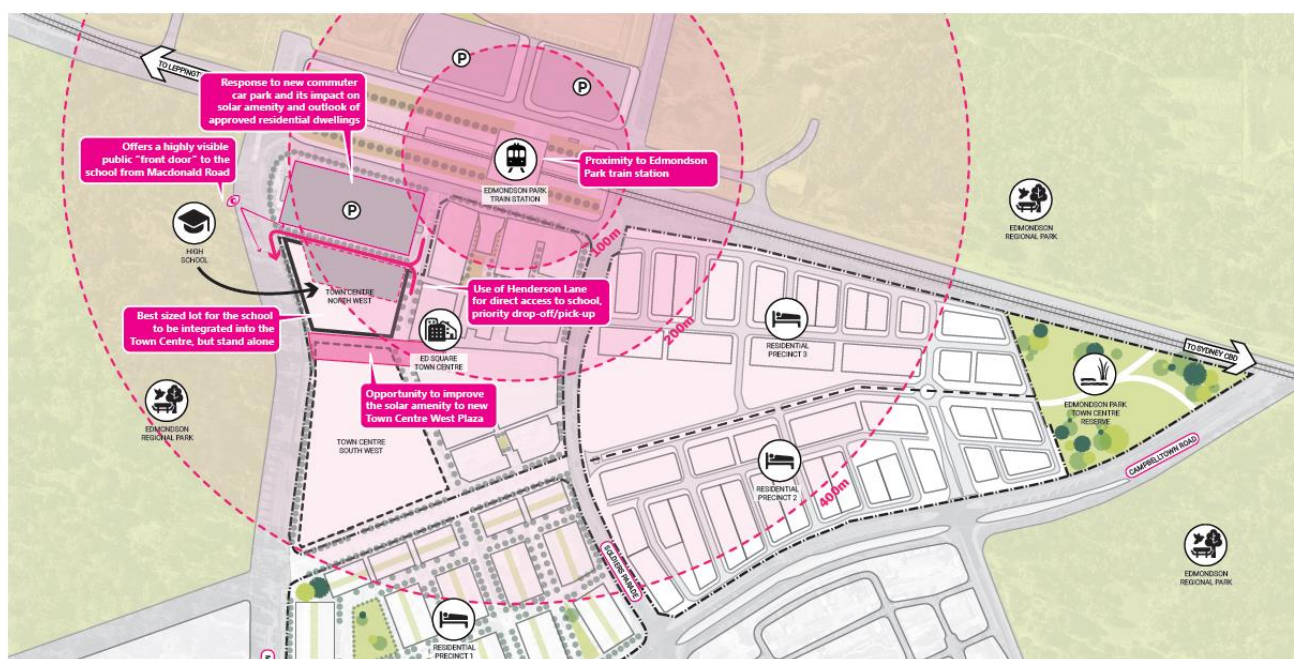


Figure 6 Locating the school in Ed. Square

Source: Terroir/Plus

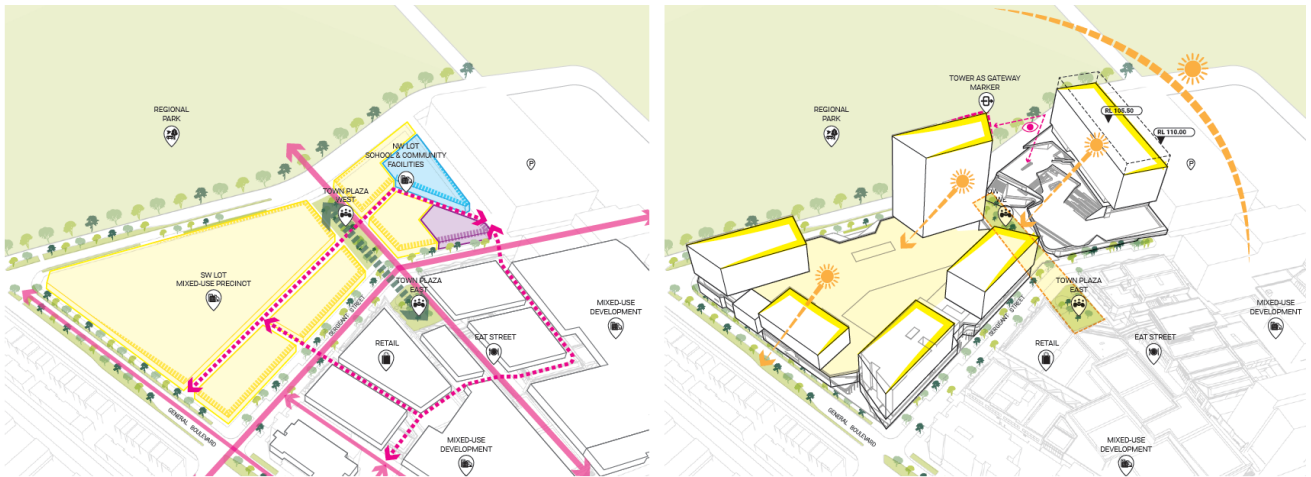


Figure 7 Massing evolution for the school in the North-West Quadrant

Source: Terroir/Plus

The massing tested in the Illustrative Design Scheme and described above necessitates changes to the approved height and GFA for the North-West Quadrant. **Figure 8** shows the currently approved heights and the proposed heights for Town Centre West. The changes to height and GFA are described at **Section 3.6**.

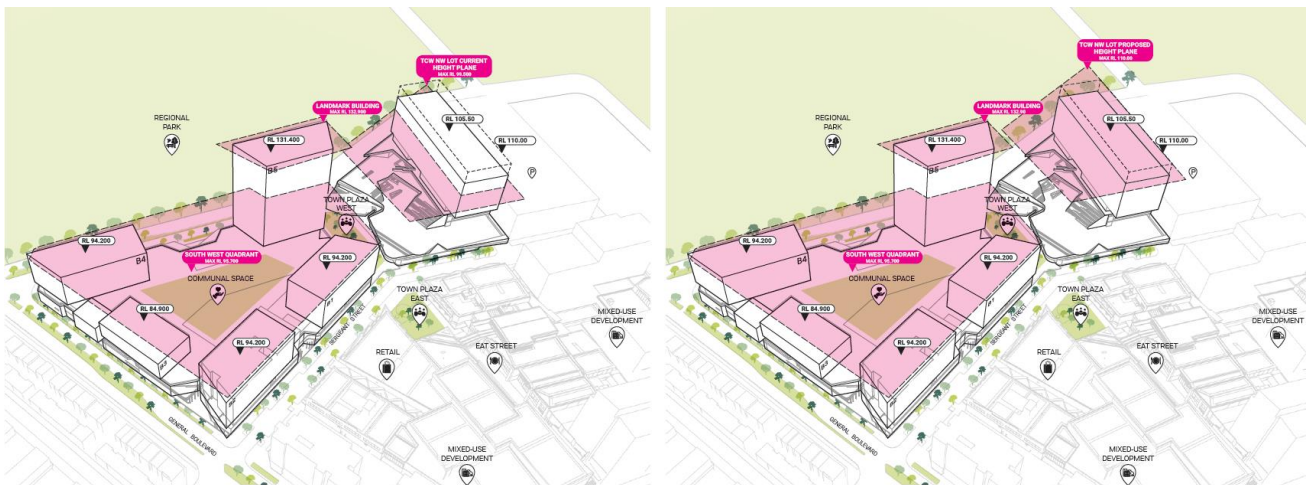


Figure 8 Heights in the North-West Quadrant: Approved (left), Proposed (right)

Source: Terroir/Plus

3.1.2 Town Square West

Under the current Concept Plan approval, Eat Street runs east/west through Town Centre East and terminates at the current Town Square fronting Sergeant Street (formerly Main Street) in the west. Across Sergeant Street, a road then bisects the Town Centre West into its northern and southern quadrants (**Figure 2**).

With the success of Eat Street and the Town Square since construction, along with opportunity to revisit the Concept Plan to accommodate a school in the Town Centre, an opportunity to extend the Town Square through Town Centre West, connecting the Town Square and regional park was identified. This would provide an extended public domain through the civic heart of the Town Centre, as well as connecting ecologies through the precinct (particularly the Cumberland Plain Forest from the regional park to Edmondson Park Reserve). The location of Town Square West is shown at **Figure 9**. Further detail regarding Town Square West is provided in **Section 3.4**.

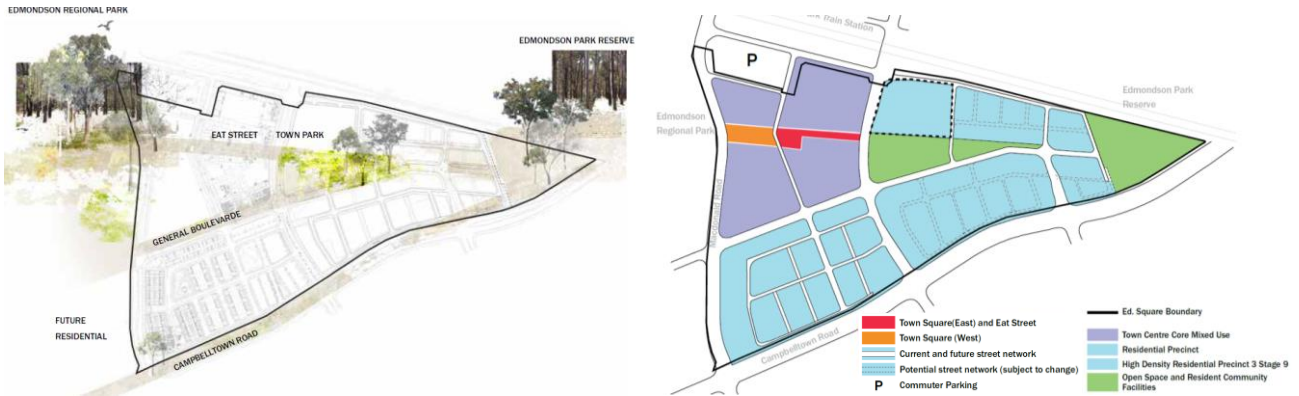


Figure 9 Town Square West: Connecting Ecologies (left), Structure Plan (right)

Source: Hassell

3.1.3 High Density Residential Precinct

With the introduction of a school in the North-West Quadrant, the previously approved apartments in the North-West Quadrant have been displaced. It is proposed that these apartments be relocated to the Residential Precincts (with no overall increase in yield).

The displaced residential apartments are proposed to be located in Residential Precinct 3 Stage 9, now known as the High Density Residential Precinct. The location of the High Density Residential Precinct was chosen due to its adjacency to the Town Centre East and local/town parks, proximity to the train station and ability to continue to provide a transition from the Town Centre Core to the lower scale residential areas to the south consistent with the principles for the town centre established in Concept Plan (Mod 4).

The Illustrative Design Scheme envisages these apartments as a podium-tower typology that provides a stepped transition in height from the Town Centre down to the lower scale Residential Precincts to the east and the local and town parks. The Illustrative Design Scheme also preserves solar access to the local park while providing good solar access to the apartment residents themselves. The massing evolution and drivers are shown at **Figure 10**.

The layout tested in the Illustrative Design Scheme indicates that changes to the approved height and GFA are required. As shown in **Figure 11**, the current 24m SEPP height limit is required to be increased. A GFA cap is also proposed to be introduced for the High Density Residential Precinct, similar to those that exist for each quadrant of the Town Centre Core. A description of the proposed changes to height and GFA is provided at **Section 3.6**.

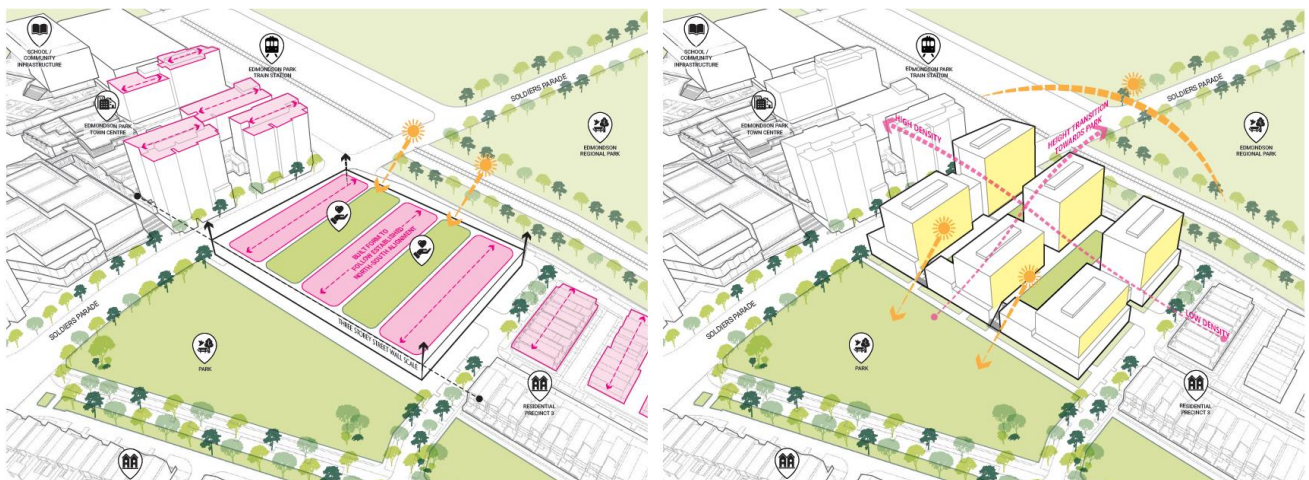


Figure 10 Massing evolution for the High Density Residential Precinct

Source: Terroir/Plus

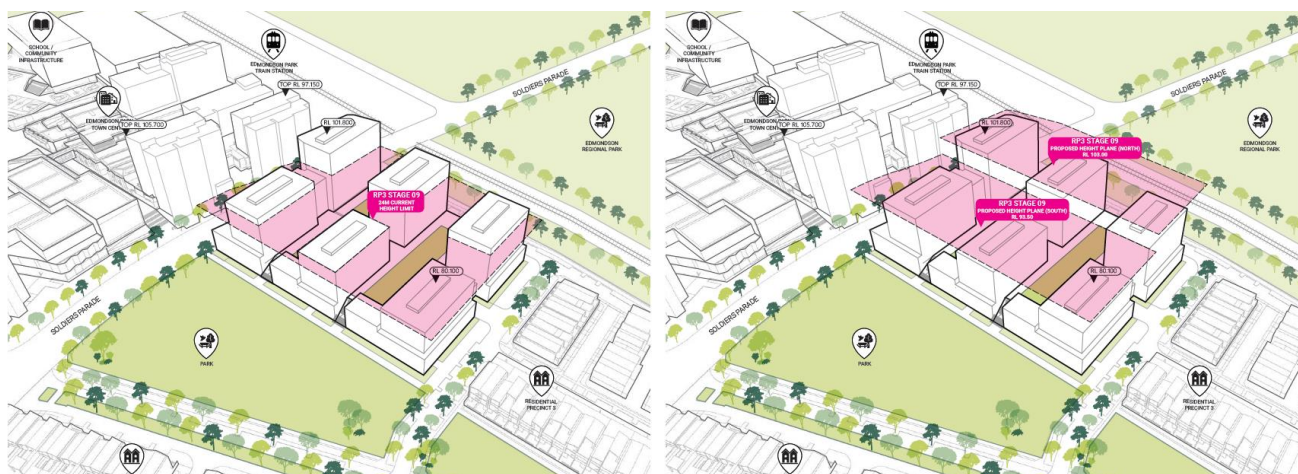


Figure 11 Heights in the High Density Residential Precinct: Approved (left), Proposed (right)

Source: Terroir/Plus

3.1.4 South-West Quadrant

It is noted that the illustrative design scheme of the south-west quadrant has evolved in line with the broader changes outlined above. This represents design development in response to the other changes within Ed. Square, including Town Square West and the new school. The location of the landmark tower has been revised in the Illustrative Design Scheme compared to the Illustrative Design Scheme presented in MOD 4, however the tower was not in a fixed location.

Approval for the location of the landmark tower would be subject to a future development application, which would then be assessed in terms of its consistency with the Concept Plan approval, Design Guidelines and Public Domain Plan. However, to enable a holistic assessment of MOD 12 the current design of the south-west quadrant has been shown.

3.2 Illustrative Design Scheme and Urban Design Report

This modification provides DPIE with an Urban Design Report (**Appendix C**) and Illustrative Design Scheme and Design Report (**Appendix D**) which contains an indicative layout and design scheme. As described above, the Urban Design Report establishes design principles for the precinct, and the Illustrative Design Scheme and Design Report outlines the form that a development within the precinct might take (in accordance with the Concept Plan and with consideration to the Design Guidelines) (**Appendix A**).

Importantly, it must be noted that the provision of the Urban Design Report (**Appendix C**) and Illustrative Design Scheme and Design Report (**Appendix D**) is to allow DPIE to assess the proposed modifications only, as subject to this Section 75W application. This application does not seek approval for the illustrative design scheme precinct outcome as expressed in these documents.

Instead, the layouts for the precinct shown in **Appendix C** and **Appendix D** are indicative only and are to allow for an assessment of this modification – they are not intended to provide a singular or fixed outcome. The Concept Plan provides a framework for future development and the final layout and arrangement of the Residential Precincts and Town Centre Core would be subject to detailed design in accordance with the Design Guidelines (**Attachment A**) and Public Domain Plan (**Attachment B**) upon submission of a detailed Development Application (at the relevant time) as required by Conditions 1.3(c) and (d).

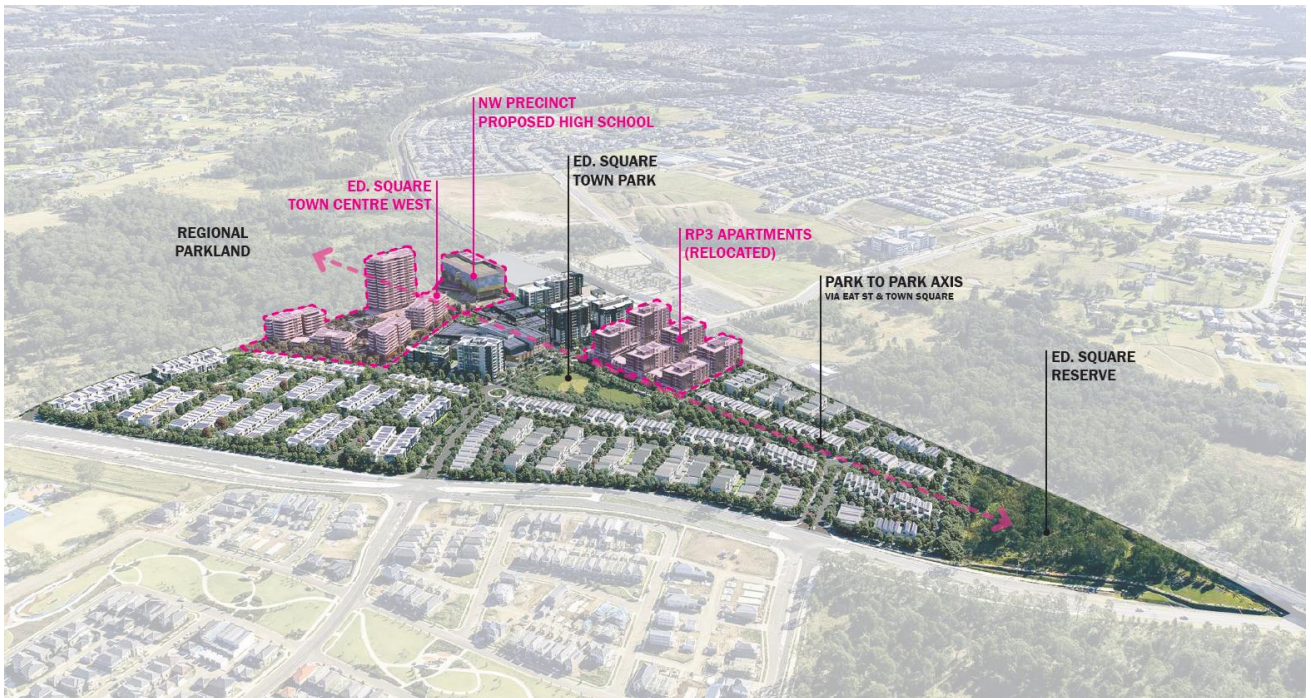


Figure 12 Indicative artistic rendering of Ed. Square Illustrative Design Scheme

Source: *Terroir/Plus*

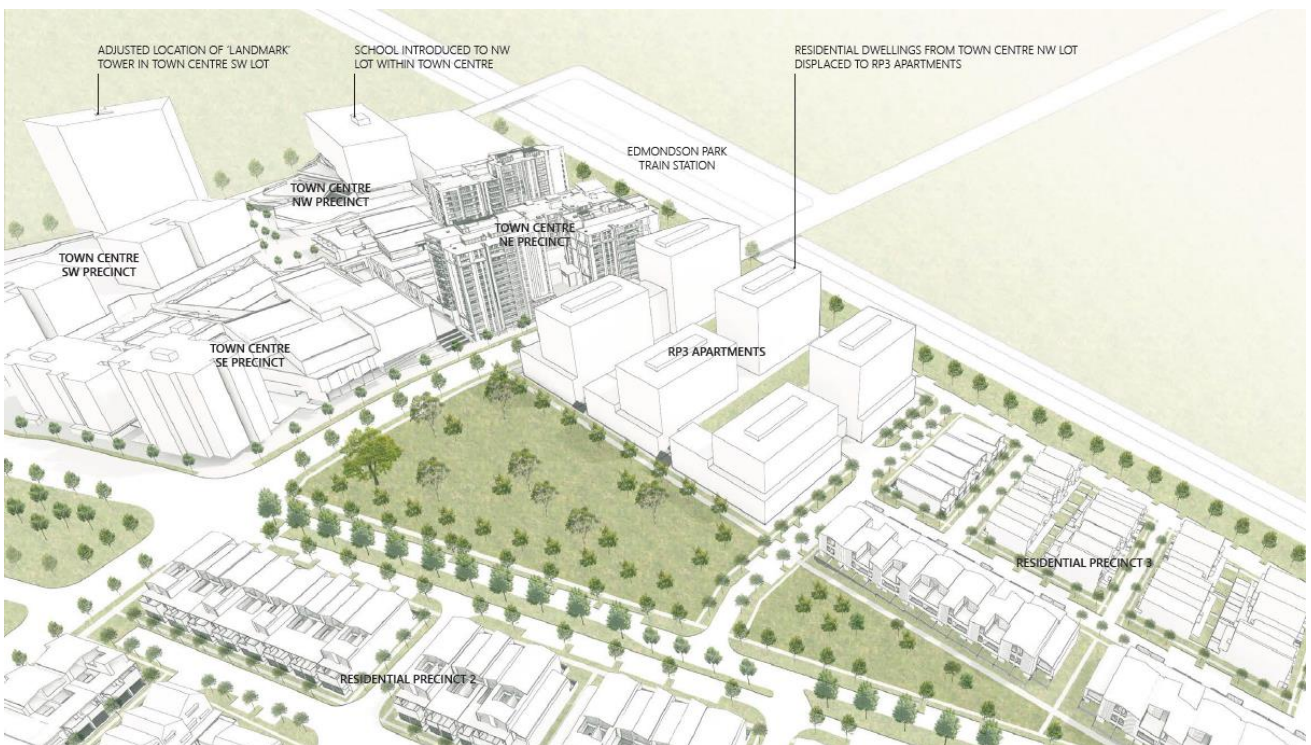


Figure 13 Indicative layout of Ed. Square showing areas subject to Mod 12

Source: *Terroir/Plus*

3.3 Amendments to the Design Guidelines

It is proposed to amend the Design Guidelines to enable the future development of a school in the North-West Quadrant and residential apartments in the High Density Residential Precinct, as shown at **Appendix A**. The changes to the guidelines are described below.

3.3.1 New Definitions

To distinguish between the High Density Residential Precinct and the remaining Residential Precincts, it is proposed to include definitions for the following two areas within the Residential Precincts:

- High Density Residential Precinct (to accommodate apartments displaced by the school).
- Medium Density Residential Precinct (remainder of the Residential Precincts unaffected by Mod 12).

The areas are shown at **Figure 14**. The High Density Residential Precinct is otherwise known as Residential Precinct 3 Stage 9.

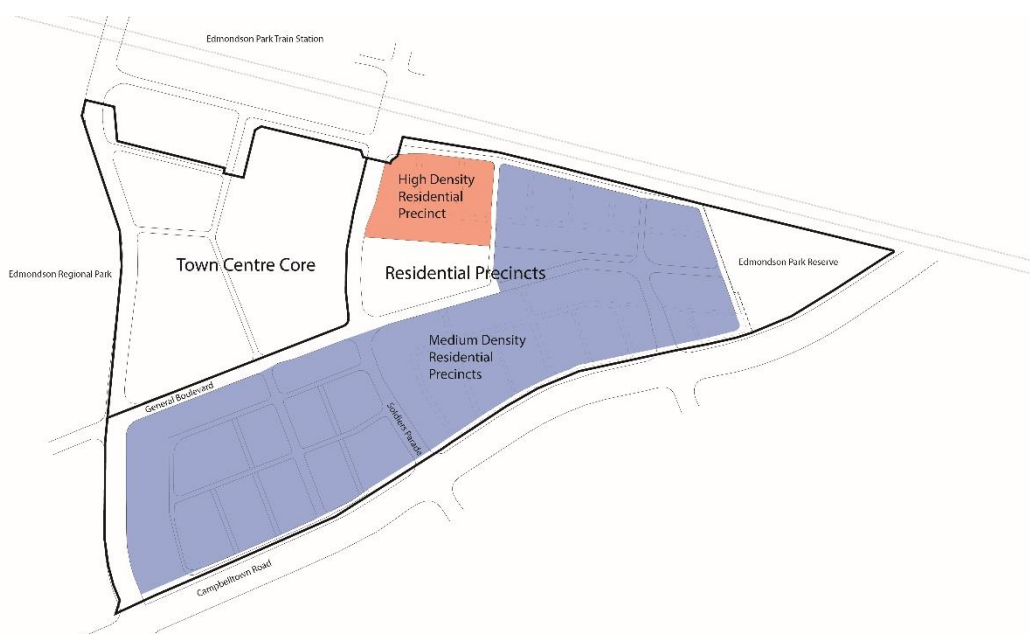


Figure 14 Design Guidelines – Precincts diagram

Source: Hassell/Ethos Urban

3.3.2 Structure Plan

The amended structure plan as depicted in the Public Domain Plan (**Appendix B**) is included in the Design Guidelines as the indicative urban structure for Ed. Square. The Urban structure is indicative only and subject to detailed design resolution as part of any relevant DA. Refer to **Section 3.4** for a description of the changes to the structure plan.

3.3.3 Education use

The design of a new school will primarily be led by the requirements of the Education Facilities Standards and Guidelines (EFSG), the Design Quality Principles in *SEPP (Educational Establishments and Child Care Facilities 2017)*, the Government Architect NSW (GANSW) Better Placed – Design Guide for Schools, along with other functional requirements.

Nonetheless, the Design Guidelines have been updated so that the school use can be accommodated in the Town Centre Core along with some key design guidance:

- Part 2 – Vision and Principles: Inclusion of “Education” use to the vision and principles for the Town Centre.
- Part 3 – Key Elements and Urban Structure: Inclusion of the school as a new key element:

- *Land use: A school is provided in the Town Centre Core.*
- Part 5 – Town Centre Core Built Form Guidelines: New section 4.6 *Educational Uses* including:
 - New Performance Criteria PCE1:
 - *respond positively to the physical, social and environmental context*
 - *support the delivery of excellent learning environments*
 - New Design Solution DSE.1:
 - *Have regard for the Education SEPP Design Quality principles including the NSW Government Architect’s Better Placed – Design Guide for Schools.*
 - New Design Solution DS7.7:
 - *Education development to achieve 5 Star Green Star Design and As-built rating or equivalent.*

3.3.4 High Density Residential Precinct

The following changes are proposed to the Design Guidelines to guide future development within the High Density Residential Precinct:

- Part 1 – Introduction: New definitions as described in **Section 3.3.1** above.
- Part 3 – Key elements and urban structure: Administrative changes to distinguish between the High Density and Medium Density Residential Precincts.
- Part 5 – Residential Precinct Built Form Guidelines:
 - New Section *High Density Residential Precinct*. New Performance Criteria and Design Solutions are proposed that have been adapted from the Town Centre Core Guidelines as appropriate for the High Density Residential Precinct. Refer to **Appendix A**. Key Design Solutions include the following:
 - *DS16.2 Provide a 2-3 storey podium at the interface with the medium density precinct and/or where adjoining a park*
 - *DS16.3 Car parking is to be sleeved by other uses or appropriately screened from view from the public domain.*
 - *DS16.7 Residential apartment buildings achieve a 5 Star Green Star Design & As-built v1.1 rating.*
 - *DS16.8 Residential apartment buildings do not prevent the adjoining Town Park and Local Park (immediately to the south) achieving 50% solar access for 4 hours mid-winter.*
 - *DS16.9 Deep soil is not required where site coverage and basement construction prevent deep soil zones. Deep soil requirements are achieved for the High Density Residential Precinct in the Town Square Park.*
 - *DS16.10 Where deep soil is not possible, alternative forms of planting may be provided, such as on structure.*
 - DS3.6 and DS3.7 are also proposed so that the deep soil requirements are consistent between the Illustrative Design Scheme and the Open Space and High Density Residential Precinct sections of the Design Guidelines.

Other minor changes reflect the evolution of the design intent since MOD 4, including the illustrative design scheme structure, updated street names, and currency of Regulation/standards.

3.4 Amendments to the Public Domain Plan

A new Public Domain Plan (**Appendix B**) is proposed that serves as an addendum to the existing Frasers Town Centre Public Domain Plan (2017) and the Ed. Square Public Domain Plan Residential Precinct Modification 11 (which will continue to remain in force). The addendum Public Domain Plan seeks to:

- Introduce Town Square West, defined separately to Town Square East.
- Include guidance for the future design of the Town Square West public domain.

- Ensure the layout and key interfaces for the High Density Residential Precinct and school are appropriately accommodated.
- Update the Structure Plan, Open Space Plan, Pedestrian Network and Street Network plans to reflect the above.

To the extent of any inconsistency between the existing Frasers Town Centre Public Domain Plan (2017), the Ed. Square Public Domain Plan Residential Precincts Modification 11, and the Ed. Square Public Domain Plan Town Centre West and RP3 Modification 12, the Ed. Square Public Domain Plan Town Centre West and RP3 Modification 12 (**Appendix B**) will prevail. This is detailed within the Public Domain Plan itself.

3.4.1 Structure Plan

To accommodate Town Square West, the school and High Density Residential Precinct, the Structure Plan and associated plans, including Open Space Plan, Pedestrian Network Plan and Street Network Plan have been updated (**Figure 15 to Figure 18**). It is noted that details within super lots are identified as indicative throughout the structure plan and are subject to detailed resolution depending on the final arrangement of dwellings, as part of any relevant detailed development application.

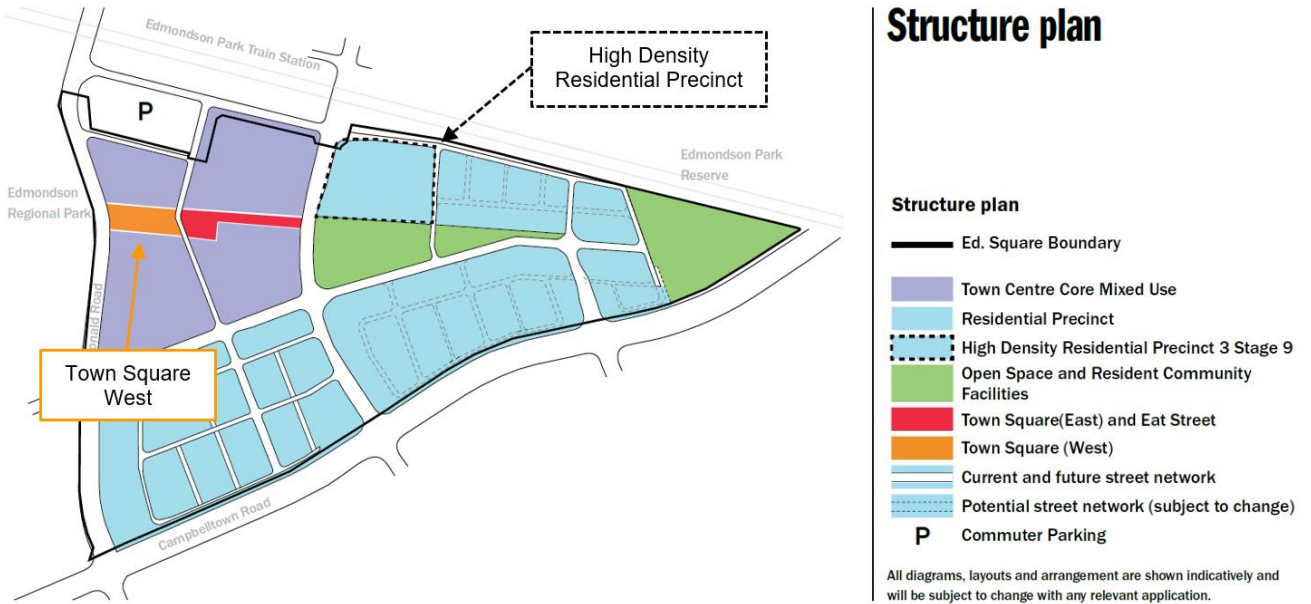


Figure 15 Amended Public Domain Structure Plan

Source: Hassell



Figure 16 Open Space Plan: Mod 11 (left), Proposed (right)

Source: Hassell

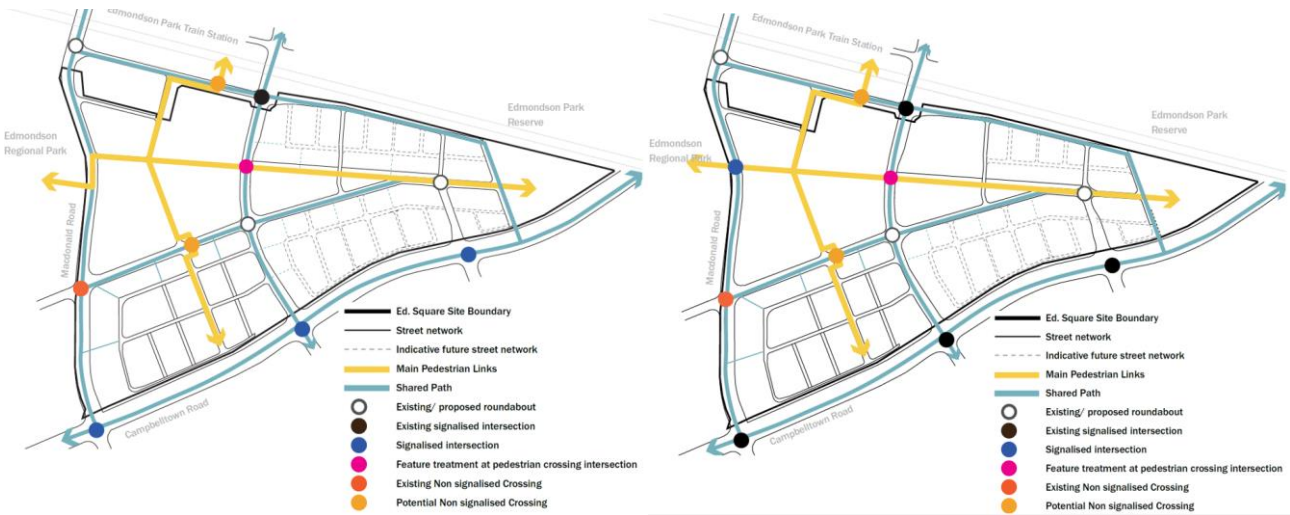


Figure 17 Pedestrian Network Plan: Mod 11 (left), Proposed (right)

Source: Hassell



Figure 18 Street Network Plan: Mod 11 (left), Proposed (right)

Source: Hassell

3.4.2 Town Square West

The Public Domain Plan has also been updated to include a guiding structure for the future development of Town Square West. As shown in **Figure 19**, the square could comprise three key spaces:

- Community Green: To connect with, and be activated by, the adjacent retail, community/school uses and the regional park.
- Retail Transition: Creating a central north-south link between the North-West and South-West Quadrants.
- Civic heart: To connect with the existing Town Square and Town Centre East and signal arrival at the civic core of the Town Centre.

The Public Domain Plan also confirms that the public domain areas (shown in **Figure 9**) will target 40% canopy coverage and that 20-30% of the Town Square West site area be provided as deep soil, contributing to the overall Precinct deep soil.

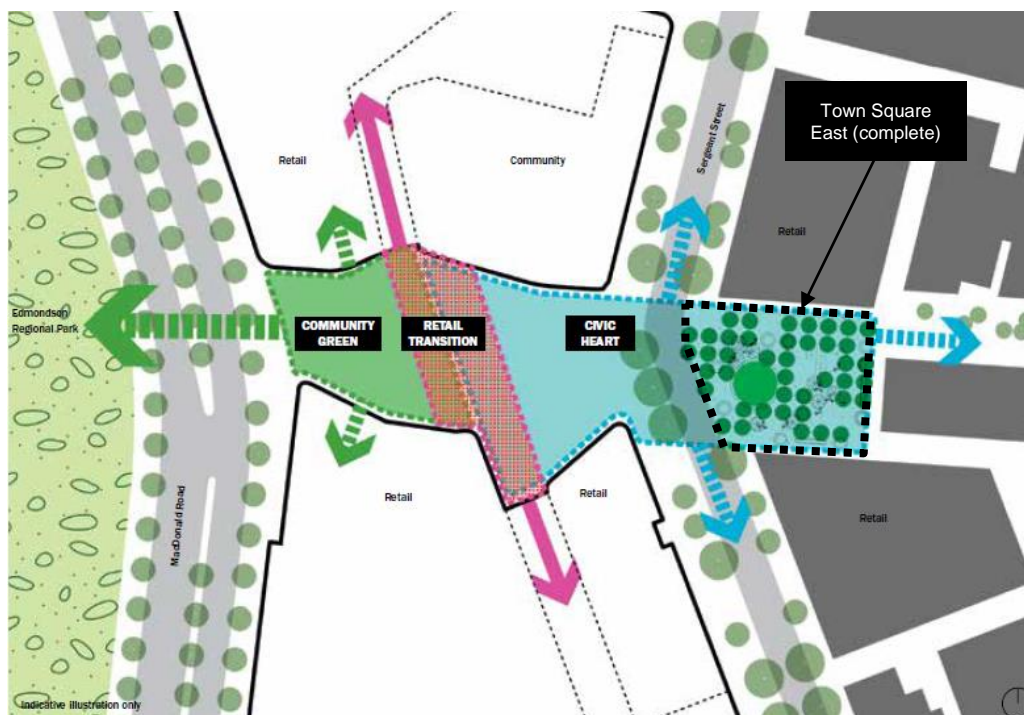


Figure 19 Indicative layout of Town Square West and its components

Source: Hassell

3.5 Dwelling yield

There is no change proposed to the overall dwelling yield of Ed. Square approved under the Concept Plan (being 1884 dwellings across the whole of Ed. Square). The dwelling yield displaced by including a school in the North-Western Quadrant is transferred to the High Density Residential Precinct.

3.6 Building Height and Gross Floor Area

As described above, changes are proposed to the approved maximum GFA and building height to accommodate the school and the High Density Residential Precinct. These changes include the following:

- Increase in height and GFA for the North-West Quadrant to accommodate a school building.
- Decrease in GFA for the South-West Quadrant to ensure the total Town Centre Core GFA remains unchanged.
- Introduction of stepped height limits and a GFA cap for the High Density Residential Precinct.

A comparison between the maximum approved and proposed height and GFA is provided at **Table 1** and **Table 2**. The distribution of height and GFA for each quadrant/precinct is shown at **Figure 20**. The heights and GFA for the High Density Residential Precinct are based on the maximum heights in the Illustrative Design Scheme and allow for a transition in height from the Town Centre Core to the town and local parks. As described above the changes proposed to the Town Centre Core are GFA neutral. The maximum height and GFA will be implemented by the Height and GFA Maps provided at **Appendix F** as well as amended wording of Condition 1.3A as described in **Section 3.7**.

Table 1 Comparison of approved and proposed maximum heights

Area	Height (Approved)	Height (Proposed)	Change
Town Centre Core			
North-West	99.5RL	110.0RL	+10.5m
North-East	105.8RL	105.8RL	No change
South-West	95.7RL (132.9RL for landmark tower)	95.7RL (132.9RL for landmark tower)	No change

Area	Height (Approved)	Height (Proposed)	Change
South-East	96.4RL	96.4RL	No change
High Density Residential Precinct			
High Density Residential north	24m	103.0RL	Varies
High Density Residential south	24m	93.5RL	Varies

Table 2 Comparison of approved and proposed maximum GFA

Area	GFA (Approved)	GFA (Proposed)	Change
Town Centre Core			
North-West	20,000sqm	26,000sqm	+6,000sqm
North-East	41,500sqm	41,500sqm	No change
South-West	55,500sqm	49,500sqm	-6,000sqm
South-East	28,025sqm	28,025sqm	No change
Total	145,025sqm	145,025sqm	No change
High Density Residential Precinct			
High Density Residential	N/A	41,400sqm	N/A

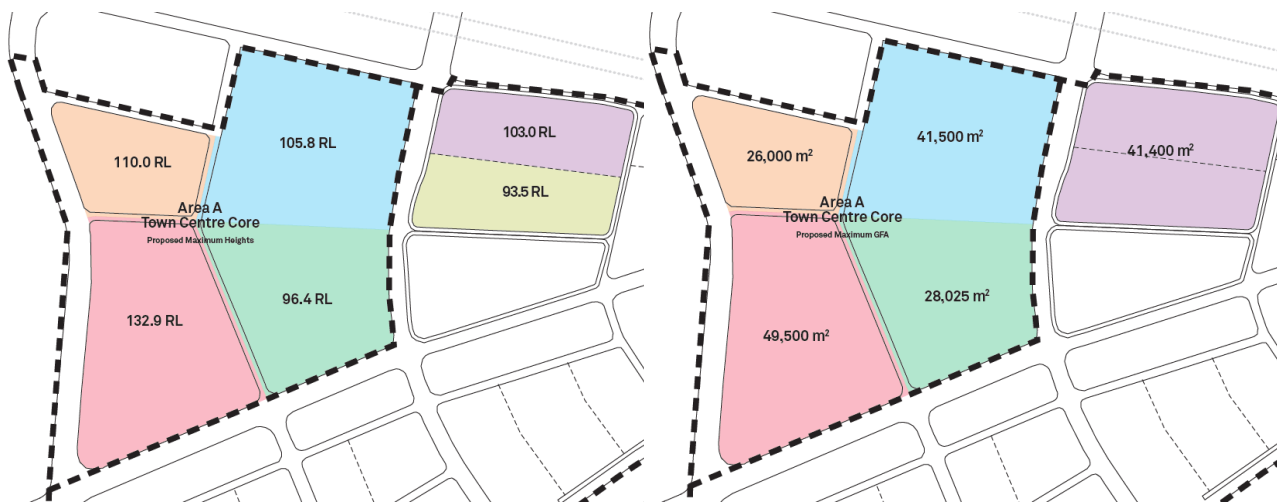


Figure 20 Proposed maximum height (left) and GFA (right) for each quadrant/precinct

Source: Hassell

3.7 Modification to conditions

The proposed modifications to the Design Guidelines and Public Domain Plan described above necessitate amendments to the consent conditions which are identified below. Words proposed to be deleted are shown in **bold strike through** and words to be inserted are shown in **bold italics**.

It should be noted that another Modification Application to MP 10_0118 (Mod 11) is currently under assessment by DPIE. It is expected that Mod 11 would be determined before Mod 12. As such we request that DPIE consider and include the Mod 11 changes in its drafting of amending conditions when assessing and determining Mod 12.

PART A – ADMINISTRATIVE CONDITIONS

1.1 The Proponent shall carry out the Concept Plan generally in accordance with the:

- a) Concept Plan Application MP10_0118;
- b) State Significant Site Study and Environmental Assessment – Edmondson Park concept plan and State significant site listing, prepared by JBA Planning and dated September 2010; [...]
- g) Environmental Assessment Report – Concept Plan Modification and Major Development SEPP Amendment (Mod 4), prepared by JBA and dated March 2017;
- h) Consolidated Response to Submissions (Mod 4), prepared by JBA and dated March 2017;
- i) Section 75W Modification of the Concept Plan MP 10_0118 (MOD 8), prepared by Ethos Urban and dated 21 March 2019; **and**
- j) **Section 75W Modification of the Concept Plan MP 10_0118 (MOD 12), prepared by Ethos Urban and dated November 2021; and**
- k) this approval.

PART C – FURTHER ENVIRONMENTAL ASSESSMENT REQUIREMENTS

1.3 Any future development application within the Frasers Town Centre must demonstrate it is consistent with the:

- a) Frasers Town Centre Maximum Height of Buildings Plan;
- b) Frasers Town Centre Maximum Gross Floor Area Plan;
- c) Frasers Town Centre Public Domain Plan; **and**
- d) **Frasers Town Centre Ed. Square Design Guidelines (November 2021) (as amended by FEAR 4.3C) and**
- e) **Ed. Square Public Domain Plan – Town Centre West and RP3 – Modification 12.**

Reason: The above amendments will give effect to the changes sought under this Modification Application, including the amended Public Domain Plan and Design Guidelines. It is noted the Design Guidelines were amended in accordance with Condition 1.3C in 2018.

1.3A Future development applications within the Frasers Town Centre Core are not to exceed the GFA and building heights specified in the table below:

a)

TCC Quadrant	Gross floor area (m ²)	Maximum height (RL)
North West	20,000 26,000	99.5 110.0
North East	41,500	105.8
South West	55,500 49,500	95.7
South East	28,025	96.4
Total	145,025	

b) Notwithstanding the GFA figures in a) above, GFA in any quadrant may exceed the maximum by up to 10 per cent, provided that the total GFA for all quadrants is not exceeded; and

c) Notwithstanding the maximum height figures in a) above, only one single ‘landmark’ building may be approved in the South West quadrant to a height of RL 132.9.

d) Future development applications within the High Density Residential Precinct are not to exceed the GFA and building heights specific in the table below:

	Gross floor area (m ²)	Maximum height (RL)
High Density Residential Precinct (north)	41,400	103.0
High Density Residential Precinct (south)		93.5

Reason: The above modifications to the wording of condition 1.3A are required so that the conditions of the Concept Plan approval specify the correct maximum heights and GFA for each portion of Ed. Square. The heights and GFA are proposed to accommodate the future development of a school in the North-West Quadrant and the High Density Residential Precinct.

4.0 Substantially the same project

As noted above in **Section 2.4**, Section 75W continues to apply to Modification Applications to a Concept Plan approved before or after the repeal of Part 3A pursuant to Schedule 2, Clause 3C(1) of the Savings and Transitional Regulation. However, Clause 3BA(5) limits the powers under Section 75W to 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).*

The proposed modification to the Edmondson Park South Precinct Concept Plan (MP 10_0118) is substantially the same project as that of the approved Concept Plan (as modified) for the following reasons:

- The modifications are considered to constitute a minor amendment to the Design Guidelines and Public Domain Plan when the overall scope and scale of the Concept Plan is considered.
- The original Concept Approval included a high school.
- The proposed inclusion of a school in the North-West Quadrant retains the intent and essence of the Town Centre Core as a mixed-use hub for the community.
- The overall approved residential yield remains the same.
- The key structural elements, layout, street network and public spaces of Ed. Square remain substantially the same.
- The proposed amendments will not give rise to any new or different environmental impacts than those originally considered.
- The maximum GFA cap for the Town Centre Core remains the same.

5.0 Environmental assessment

5.1 State Environmental Planning Policy (State Significant Precincts) 2005

Appendix 16 of the SSP SEPP is the principal environmental planning instrument that applies to the site. It sets out the key planning controls including with regards to land use zoning, floor space ratio, building height and heritage conservation.

Ed. Square is zoned B4 Mixed Use under the SSP SEPP, where residential flat buildings and educational establishments are permissible with development consent. B4 Mixed Use is also a prescribed zone for school development under *SEPP (Educational Establishments and Child Care Facilities) 2017*. Therefore, no amendments are required to either the Concept Plan or the SSP SEPP to allow development of the school or High Density Residential Precinct to be permissible.

Since the Concept Plan approval supersedes the SSP SEPP to the extent of any inconsistencies, it is not proposed that the SSP SEPP be amended to reflect the changes to FSR/GFA or height, since the maximum GFA and height set by the Concept Plan approval will take precedence, consistent with the approach to the Town Centre Core currently. Nonetheless, regard is to be given to the height and FSR standards. The blanket 24m height limit that applies to the entire Ed. Square site was implemented prior to Mod 4 being approved and therefore does not reflect the heights of the Town Centre Core as approved and constructed. The proposed modification seeks to implement building heights that are sufficient to accommodate the new school and provide a transition from the Town Centre heights down to the Medium Density Residential Precincts. Presently, the Town Centre Core ends with a height limit drop to the 24m. The proposal will provide for a better transition to the 24m height. An FSR of 2.5:1 also applies to the Ed. Square site under the SSP SEPP. It is expected that the broader Ed. Square will still be capable of complying with the 2.5:1 applied to the whole site in light of the modification.

5.2 Edmondson Park South precinct mapping

To align with the proposed modification and for completeness, revised maps of the Edmondson Park South precinct as a whole have been amended by Hassell, including the following:

- Concept Plan map.
- Bushfire Asset Protection Zones map.
- Open Space Network map.
- Pedestrian, Cycle and Public Transport Network map.
- Road Network and Hierarchy map.
- Water Cycle Management Strategy map.

These revised maps have been appended to this report at **Appendix E** and will supersede those currently approved under Mod 4 and those submitted with Mod 11 (currently under assessment) for consistency.

5.3 SEPP 65 – Design Quality of Residential Apartment Development

SEPP 65 and the NSW Apartment Design Guidelines (ADG) set design principles and guidelines for the design and amenity of residential apartment development across NSW. While this Concept Plan does not seek development consent for the construction of residential apartments, the Illustrative Design Scheme that has informed the proposed changes to the Concept Plan has considered the requirements of SEPP 65 and the ADG. In particular, the design criteria relating to visual privacy, building separation, communal and private open space, solar access and natural ventilation have been considered in developing the Illustrative Design Scheme. As described in **Section 5.8**, the Illustrative Design Scheme demonstrates, at a high level, that the Concept Plan as proposed to be modified, can result in development that satisfies the Design Principles of SEPP 65 and the key design criteria of the ADG, in particular for the High Density Residential Precinct.

5.4 Built form and urban design

As described in **Section 3.1.2**, Town Square West is proposed as an extension of the existing Town Square to the west, connecting visually and physically to the regional park. In combination with the school and South-West

Quadrant, Town Square West frames the civic heart of the Town Centre and will be activated by the surrounding community, school and retail uses. The final design of Town Square West will be subject to a future DA and should be guided by the Public Domain Plan (**Appendix B**).

Sizing of the school has ultimately been based on the required capacity and stream requirements (which are in turn based on service need, demand and future growth) in collaboration with the NSW Government. As described in **Section 3.1.1**, the siting, height and form of the school building was driven by solar access to Town Square West, Bushfire Asset Protection Zones, interface with the existing commuter car park to the north and school capacity, facility and layout requirements (along with EFSG, Education SEPP and Design Guide for School requirements). The urban design evolution of the school is depicted at **Figure 21**. The resulting form under the Illustrative Design Scheme concentrates mass towards the northern end of the quadrant, which in turn informs the maximum height and GFA sought under this modification.

The Concept Plan modifications will result in a school/community building that provides amenity to, and integrates with, Town Square West. The built form and massing will be designed to facilitate this. The maximum height of the North-West Quadrant has been increased by 10.5m to accommodate such a built form. The proposed maximum height is considered appropriate in the context of the Town Centre Core.

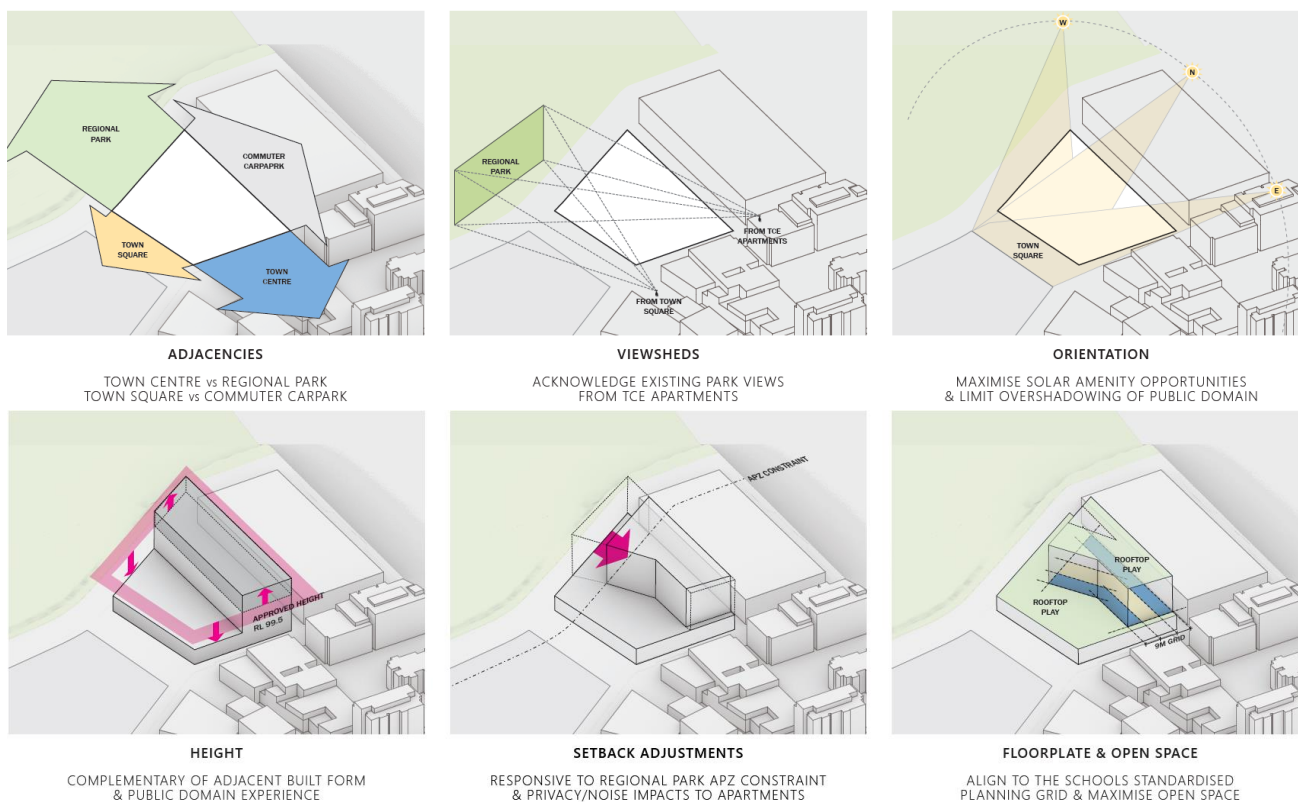


Figure 21 Illustrative Design Scheme – Urban design evolution for school building

Source: *Terrair/Plus*

As described in **Section 3.1.2**, the built form of the High Density Residential Precinct seeks to accommodate the displaced apartments from the North-West Quadrant while setting a height that provides a stepped transition from the Town Centre Core to the lower scale Medium Density Residential Precinct and preserving solar access to the town and local parks. This is achieved in the Illustrative Design Scheme by distributing the mass into six towers atop a single two-three storey common podium with communal open space. The towers are oriented north-south and arranged as shown in **Figure 22**.

The two tallest towers are located adjacent to the Town Centre Core and closer to the train station, with the southern tower slightly shorter to transition down to the parks. The built form then steps down in height towards the lower scale Medium Density Residential Precinct. This creates a better visual transition between the Town Centre Core and the low scale residential areas within the rest of Ed. Square. The north-south alignment and separation

into six towers also preserves an appropriate amount of sun to the town and local parks, as well as providing opportunities for good solar access to occupants of the towers.

In tandem with the proposed maximum height and GFA controls, the Performance Criteria and Design Solutions in the Design Guidelines will ensure an appropriate built form outcome. In particular, the Design Guidelines include the following design solutions:

- “Provide a 2-3 storey podium / street wall interface with the medium density precinct and/or where adjoining a park.” (DS16.2) and
- “Residential apartment buildings do not prevent the adjoining Town Park and Local Park (immediately to the south) achieving 50% solar access for 4 hours mid-winter” (DS16.7).

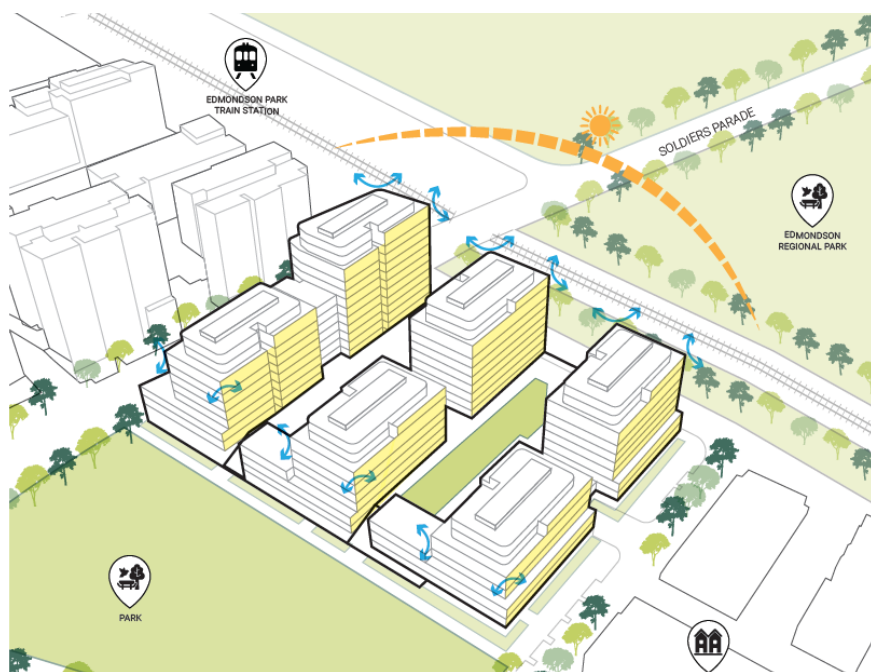


Figure 22 High Density Residential Precinct Illustrative Design Scheme Massing (indicative only)

Source: Terroir/Plus

5.5 Overshadowing

Town Square West and New School

The revised massing proposed has been informed by overshadowing to public spaces. By including a school within the North-West Quadrant, more sunlight can be provided to Town Square West than could be provided under the current approval (Mod 4). A comparative analysis of solar access to Town Square West under the Mod 4 and proposed Mod 12 Illustrative Design Scheme is provided at **Figure 23** and **Figure 24**.

The analysis shows that with the school included in the North-West Quadrant (**Appendix D**), sun access to Town Square West is significantly improved both mid-winter and at the equinox.

High Density Residential Precinct – town and local parks

As described above, the massing of the High Density Residential Precinct has been configured to preserve sun access to the local and town parks to the south of the precinct in accordance with best practice by the City of Sydney DCP control: *50% of the park gets 4 hours sun during mid winter*, noting Liverpool Council does not have a comparative control

A shadow analysis provided at **Figure 25** and **Figure 26** demonstrates that for the Illustrative Design Scheme, over 50% of the town and local park area (combined) receives sunlight between 9:30am – 1:30pm (four hours, mid-winter). This requirement is reflected in the Design Guidelines so that future development will preserve sunlight to

the parks. Therefore, it is demonstrated that the parks can receive an adequate amount of sunlight under the proposed modifications. In addition, since shadows fall on the park, they will not impact the solar access of the Medium Density Residential Precinct.



Figure 23 Comparative overshadowing analysis: Mod 4 (top) and Proposed Mod 12 (bottom) Illustrative Design Scheme: Mid-winter

Source: *Terroir/Plus*

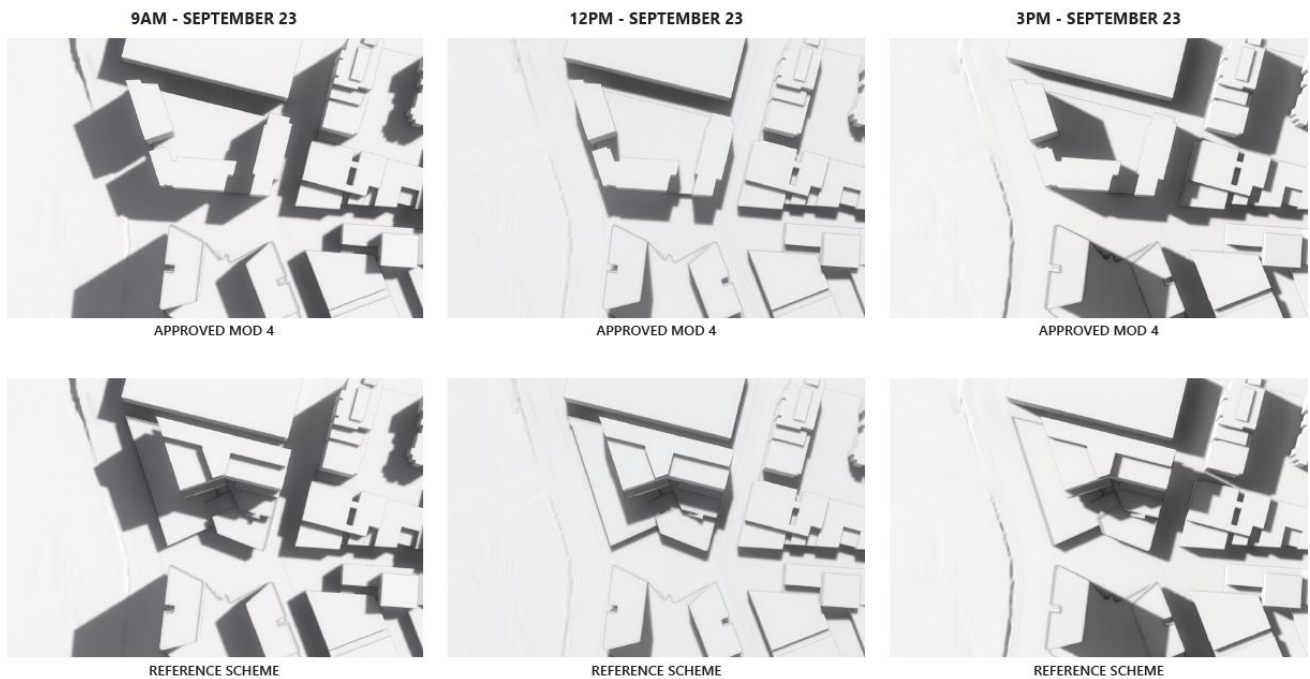


Figure 24 Comparative overshadowing analysis: Mod 4 (top) and Proposed Mod 12 (bottom) Illustrative Design Scheme: Equinox

Source: *Terroir/Plus*

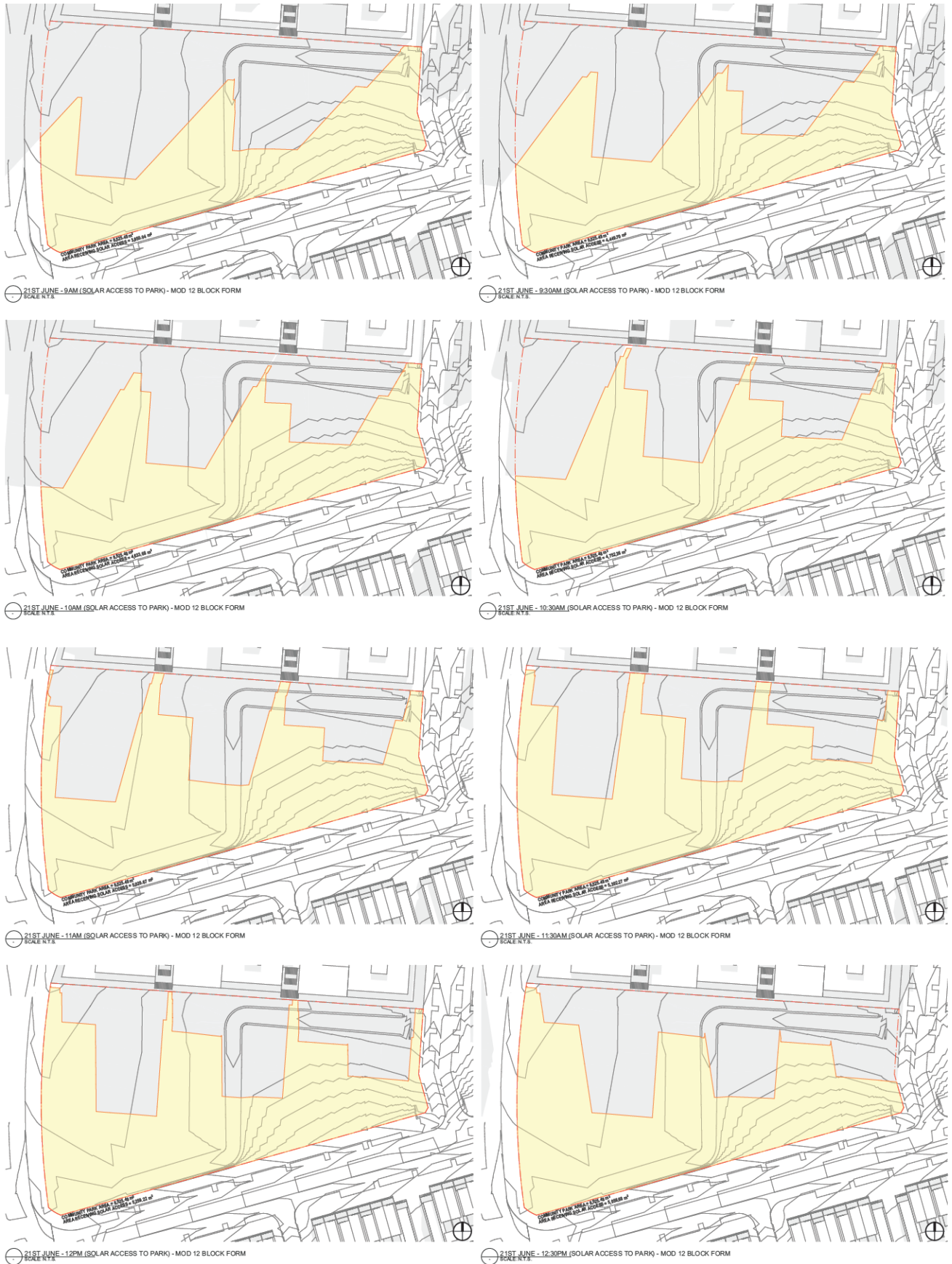


Figure 25 Shadow analysis of local and town parks: mid-winter, 9am to 12:30pm (yellow area receives sun)
Source: Terroir/Plus

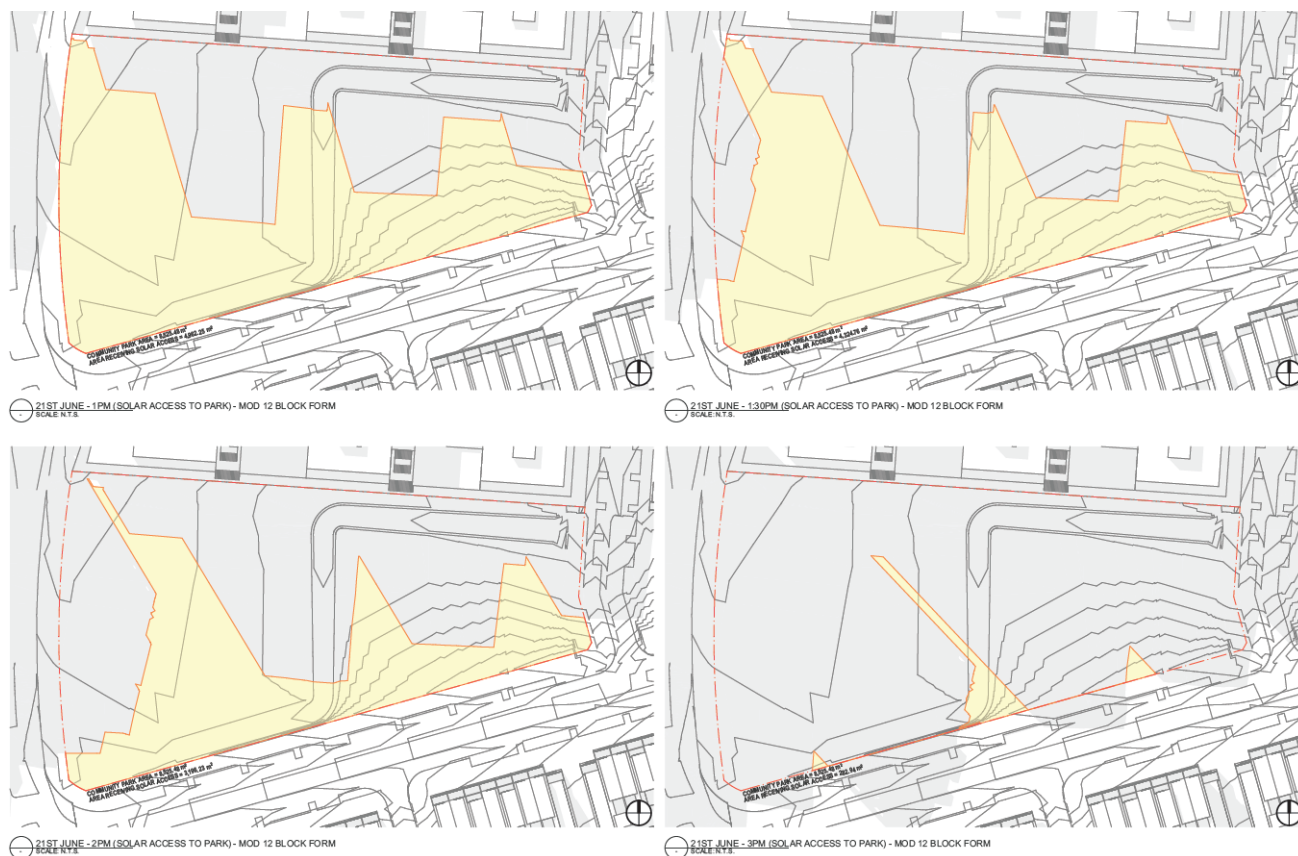


Figure 26 Shadow analysis of local and town parks: mid-winter, 1pm to 3pm (yellow area receives sun)

Source: *Terrair/Plus*

5.6 Open space, landscaping and deep soil provision

This modification seeks to increase the provision of formal open space within Ed. Square, in particular by facilitating Town Square West. While the final form of Town Square West will be subject to a detailed development application, the Public Domain Plan at **Appendix B** provides guidance as to what the structure of the space might be (also discussed at **Section 3.4**). A further indicative graphic is provided at **Figure 27**. It is envisaged that Town Square West will be a vibrant open space, activated by the retail, community and school edge uses to the north and south while connecting Eat Street to the regional park physically and visually.

Town Square West (**Figure 27**) will target the provision of 20-30% deep soil coverage to support mature tree growth, while the public domain areas across Ed. Square will target 40% canopy coverage (as per the Public Domain Plan). Town Square West also strengthens the east-west pedestrian link from the reserve through to the Town Centre Core and regional park.

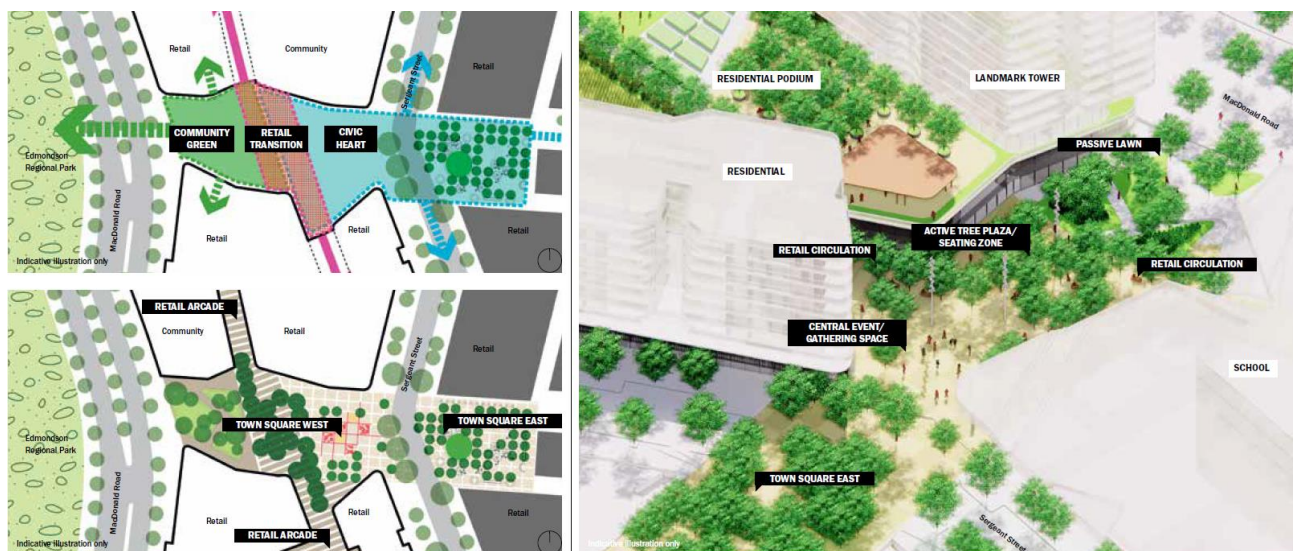


Figure 27 Indicative structure plan and layout of Town Square West

Source: Hassell

As per the Illustrative Design Scheme, communal open space will be provided to the High Density Residential Precinct at the top of the common podium. This large, consolidated space will be able to provide different zones for different uses, such as community barbeques and shelters, passive and active uses, a central community lawn and pool. The Illustrative Design Scheme indicates a communal open space target of 25% of the High Density Residential Precinct can be achieved. Note that the final design of the communal open space would be subject to future development applications as relevant.

Residents will also have close access to the town and local parks directly to the south.

The original intent has always been for Edmondson Park to be a dense urban precinct that maximises the opportunities provided by the railway station. Accordingly, the broader Concept Plan preserved significant regional parkland (150 hectares) to enable Edmondson Park to deliver a true town centre. Deep soil opportunities are constrained by basements and podium structures in the Town Centre and High Density Residential Precinct which is typical, however alternative solutions have been considered to ensure mature tree growth can still be achieved.

It is noted that deep soil requirements for the Town Centre Core and the High Density Residential Precinct are otherwise provided in the Regional Park, new Town Square West (in accordance with the Public Domain Plan) and Town Square and other parkland across the whole development. To ensure this strategy is clear, the Design Guidelines provide for alternative forms of planting to be provided, such as on structure, where deep soil cannot be provided due to basements or site coverage. The Public Domain Plan also contains principles to guide deep soil and tree canopy delivery.

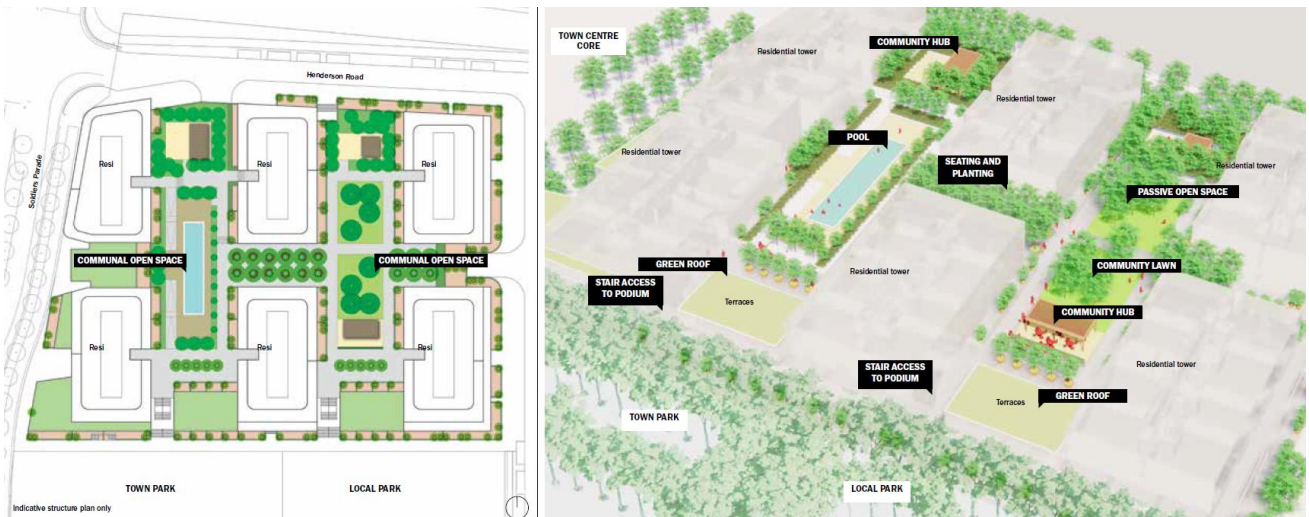


Figure 28 Indicative concept plan and layout of High Density Residential communal outdoor podium

Source: Hassell

5.7 School design quality and amenity

As described in **Section 3.3.3**, the final design of the school will be subject to the NSW Government’s requirements, the EFSG, the Education SEPP Design Quality Principles and the GANSW Better Place – Design Guide for Schools. This will ultimately be dictated by the relevant future development application. A “test” school design for the purposes of this modification is provided in the Illustrative Design Scheme Report at **Appendix D**. The scheme demonstrates that the requirements for the school can be met, with consideration to the EFSG and other school design requirements. Indicative floor layouts are shown at **Figure 29**.

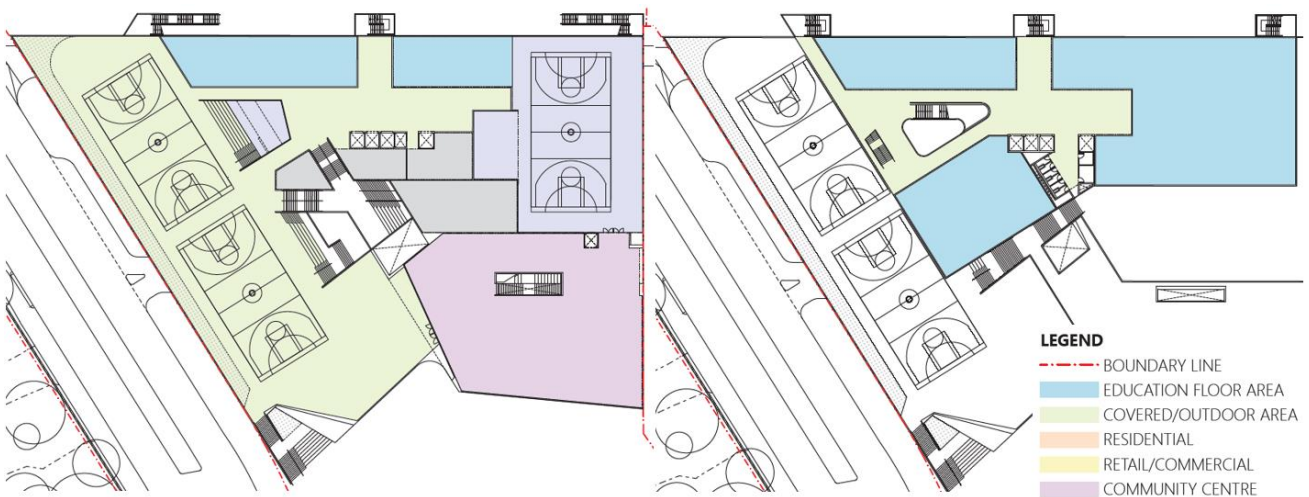


Figure 29 Indicative school design Level 1 (left) and Typical Level (right)

Source: Terroir/Plus

5.8 Residential amenity

The proposed amendments to the Design Guidelines and Public Domain Plan will not adversely affect, or substantially change, the residential amenity within the Town Centre Core and Medium Density Residential Precinct. As described above, the school and High Density Residential Precinct will not overshadow surrounding residents, since their shadows either fall on public spaces or self-shadow within the site.

The High Density Residential Precinct will deliver high levels of residential amenity for its occupants. In particular:

- The amended Design Guidelines (**Appendix A**) will ensure that apartments in the High Density Residential Precinct will be compliant with the relevant key design controls. The Design Guidelines will be considered when detailed development applications are made within the precinct. In particular, the Design Guidelines include the following amenity controls:
 - PC16 states that *High density residential accommodation is provided with a high level of amenity, including functional, private and communal areas with access to adequate sunlight and daylight, natural ventilation, outlook and views, visual privacy, acoustic privacy and protection from other environmental nuisance such as odour, dust and vibration.*
 - DS16.1 requires that apartments are designed to meet the requirements of SEPP 65 and the ADG.
 - DS16.5 requires that apartments achieve the following minimum BASIX performance of 34 Energy and 51 Water.
- The amended Public Domain Plan establishes potential to explore additional open spaces (pocket, gateway, linear parks) throughout the super lots, subject to the layout and resolution of dwelling arrangements, which will provide benefit to future residents.
- A preliminary ADG assessment of the Illustrative Design Scheme (**Appendix D**) concludes that development can be undertaken in accordance with the Concept Plan that complies with the relevant provisions of the ADG, in particular:
 - The ADG building separation requirements can be met (12m-24m separation as shown in **Figure 30**).
 - Over 60% of apartments can achieve natural cross ventilation.
 - Approximately 75% can achieve two hours of solar access between 9am and 3pm, mid-winter.
 - Communal open space of approximately 25% of the site can be provided.

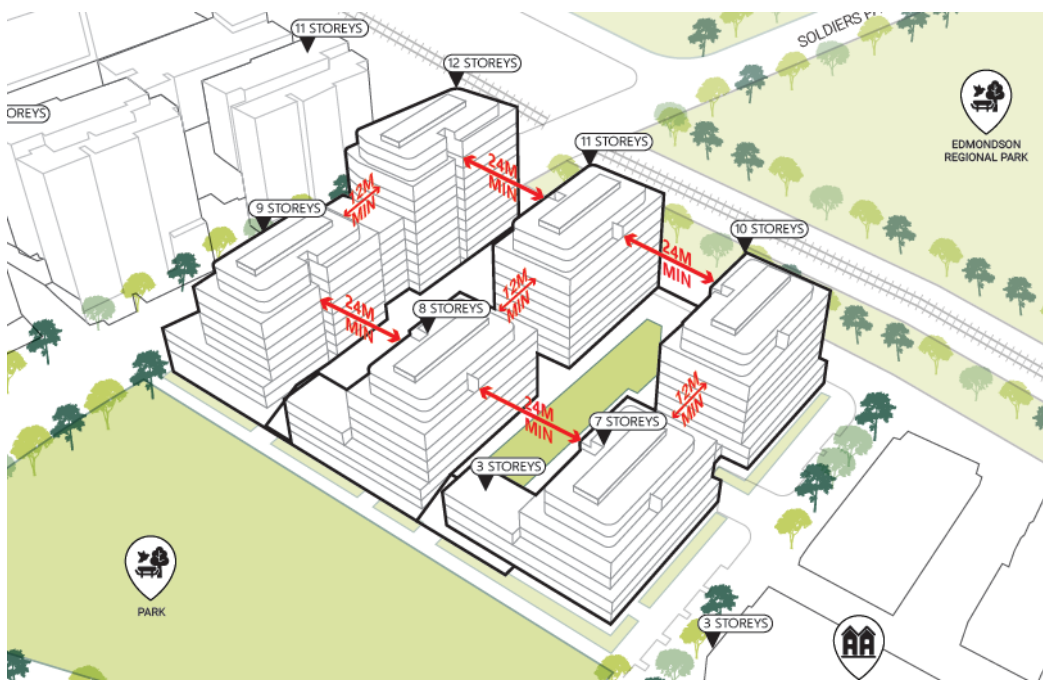


Figure 30 Illustrative Design Scheme showing ADG compliant building separation

Source: Terroir/Plus

5.9 Bushfire protection

The western portion of Ed. Square is impacted by bush fire prone land due to the regional park woodland that lies directly to the west of the site. A Bushfire Safety Statement has been prepared by Peterson Bushfire and is provided at **Appendix J**. The assessment finds that the school use in the North-West Quadrant would require additional bushfire protection since it is defined as a Special Fire Protection Purpose Development (SFPP). The letter recommends that a minimum 43m asset protection zone (APZ) be applied to the North-West Quadrant and that a 16m APZ be retained for the residential uses in the South-West Quadrant.

The required APZs are shown at **Figure 31** and have been included in the Edmondson Park South Bushfire Asset Protection Zone Map at **Appendix E**. The required APZs have also been considered in developing the Illustrative Design Scheme and will be a consideration for any future development at the site.

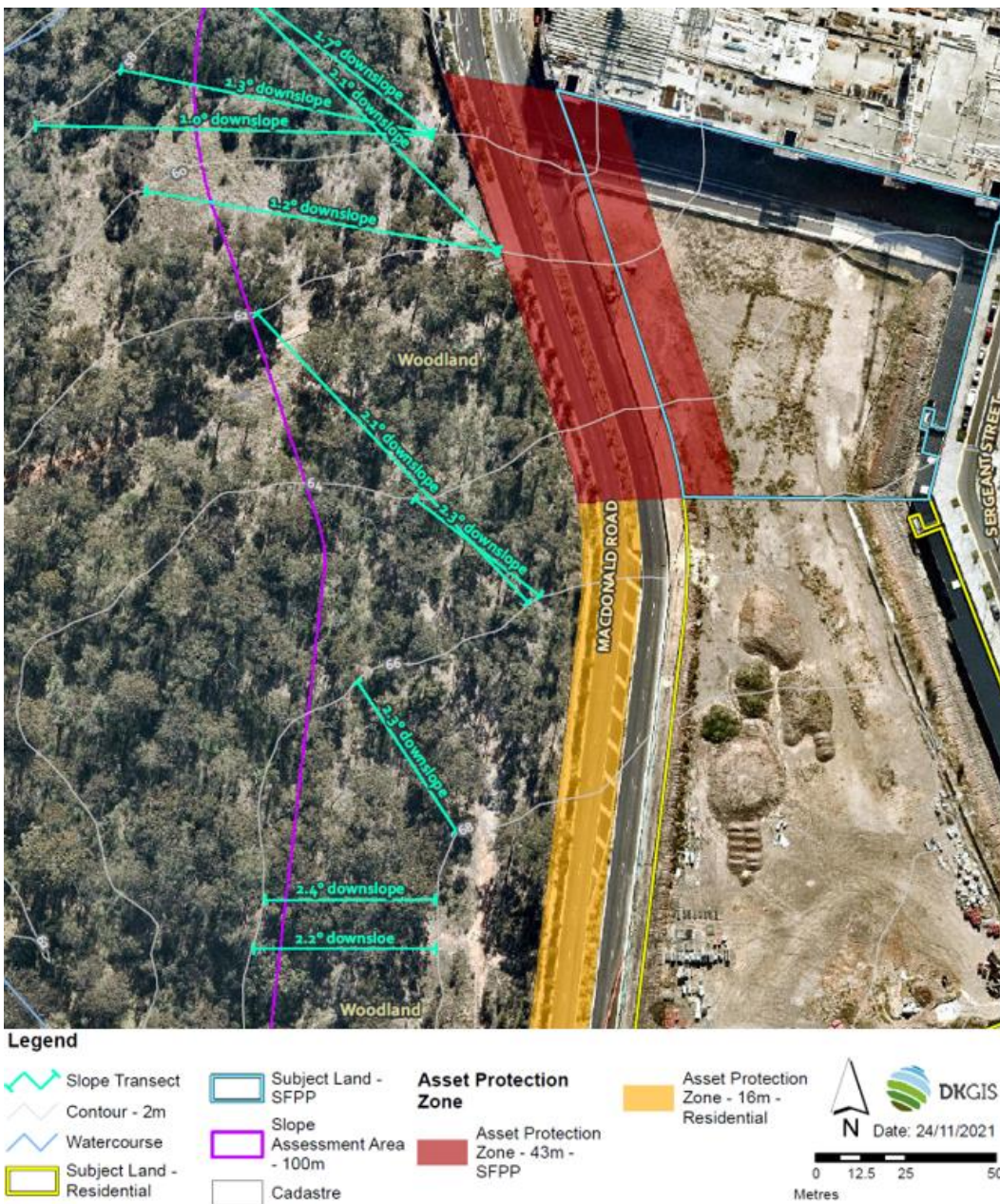


Figure 31 Required asset protection zones for the North-West and South-West

Source: Peterson Bushfire

5.10 Transport and parking impacts

A Transport Assessment of the proposed modifications has been prepared by Ason Group and is provided at **Appendix G**. The Transport Assessment finds that:

- Access arrangements to the school and High Density Residential Precinct are acceptable (pending future detailed development applications).
- While the majority of people in the area commute by private vehicle, this is expected to shift towards more public and active transport with the development of Ed. Square and the surrounding area. Further, the school would implement a Green Travel Plan and/or Student Travel Plan to target an increase in mode share of active and public transport methods.
- The proposed modification can be accommodated with the completed and/or committed upgrades to the local road network. An Aimsun analysis indicates that the modification will have no material impact on the performance of the surrounding road network. All key intersections are expected to still operate at an acceptable Level of Service D or better.
- The proposed modifications adopt the same residential parking rates as the Town Centre Core for the High Density Residential Precinct. This is considered appropriate due to the co-location and similarity of typology to the Town Centre Core residential apartments. Parking associated with the school would be determined as part of the relevant future development application and would be subject to a Traffic Report and appropriate assessment at the time.
- The Illustrative Design Scheme developed to inform the modification is expected to include sufficient parking to accommodate the forecast parking demand. Notwithstanding, the quantum and design of car parking (inclusive of visitor, accessible and bicycle parking) for each development will be subject to future development applications.
- The existing and future public and active transport infrastructure has been reviewed and the existing transport services and additional active transport infrastructure to be constructed surrounding the site can readily accommodate the future demand of the Ed. Square Town Centre and school (as proposed to be modified).
- A signalised mid-block pedestrian crossing on Macdonald Road would result in acceptable traffic impacts. The need for this crossing, along with a marked pedestrian crossing on Sergeant Street (south of Henderson Lane) is to be further investigated as part of the school development application.

5.11 Visual Impact and views

A high-level assessment of the visual impacts associated with the new school and the High Density Residential Precinct is provided at **Appendix D**. The assessment compares the visual and view impacts of the North-West Quadrant in accordance with the Mod 12 Illustrative Design Scheme and the Mod 4 Illustrative Design Scheme. As shown at **Figure 32**, Mod 12 allows the built form to be further setback from the south and modulated (primarily as a result of the residential amenity controls applying to the Mod 4 scheme), in turn reducing the visual impact and the impact on views from surrounding streets. In particular, the massing would have a less imposing presence on Town Square West when viewed from within the square and when looking towards the square from the surrounding public domain. As shown in **Figure 33**, the perceived bulk and scale when viewed from Macdonald Road is also reduced. Also shown in **Figure 33** is that views to the regional park from the existing Town Centre East residential apartments are improved. Therefore, the proposed modifications as they relate to Town Centre West will have a positive impact in terms of views and visual impact.

The visual and view impact of the High Density Residential Precinct massing was also investigated at **Appendix D**. It is accepted that there will be a visual impact due to the increased height and massing in this precinct. However, the assessment shows that the stepping up towards the Town Centre assists in visually marking the Town Centre, as shown in **Figure 34** from near the train station. Similarly, when viewed from across the local and town parks, the stepped transition down towards the Medium Density Residential Precinct is perceived (**Figure 35** and **Figure 36**). The lower built form on the southern side of the precinct also reduces the feeling of bulk and scale and the siting of residential towers above the podium provides visual breaks and makes sunlight and sky visible. Taken in tandem with the improvement to the Town Centre Core, the proposal is considered to have acceptable visual and view impacts.

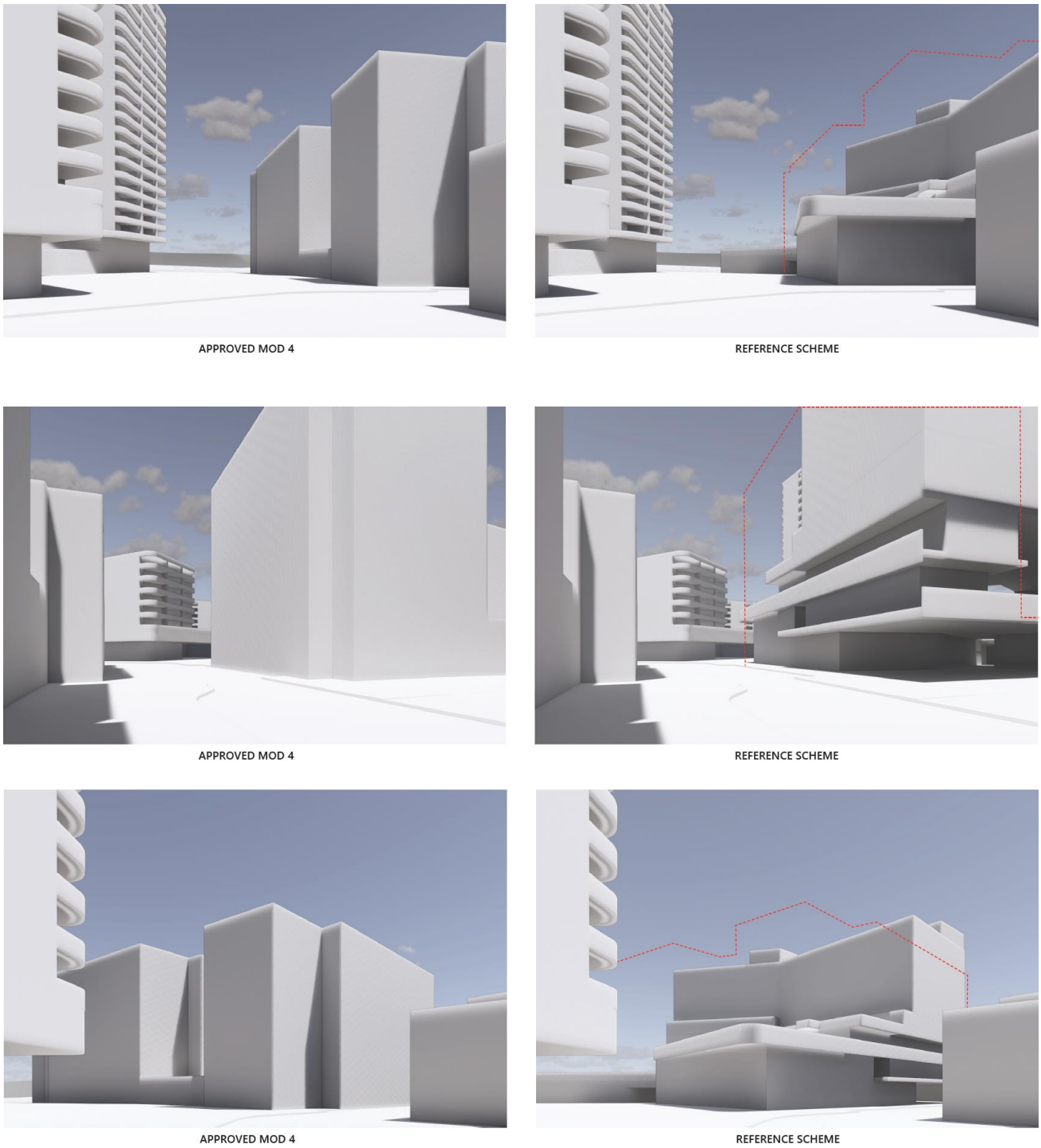


Figure 32 Comparison of indicative Mod 4 (left) and Mod 12 (right) massing viewed from Sergeant Street
Source: *Terroir/Plus*

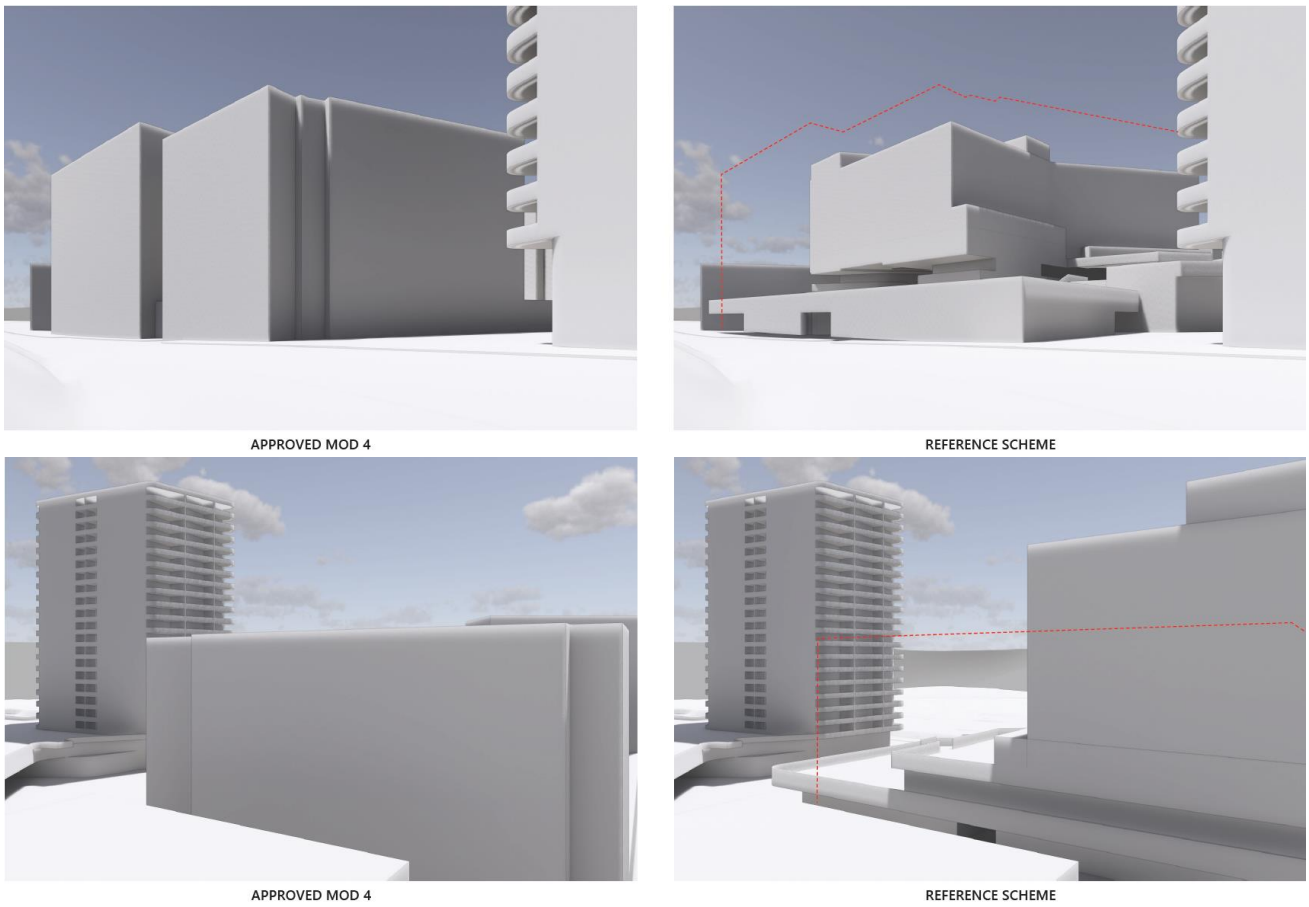


Figure 33 Comparison of indicative Mod 4 (left) and Mod 12 (right) massing viewed from Macdonald Rd (top) and existing Town Centre East apartments (bottom)

Source: *Terroir/Plus*



Figure 34 View of High Density Residential Precinct illustrative massing from Soldiers Parade and Henderson Road (near train station)

Source: *Terroir/Plus*



Figure 35 View of High Density Residential Precinct illustrative massing from Soldiers Parade and General Boulevard (looking north-east across town and local park)

Source: *Terroir/Plus*



Figure 36 View of High Density Residential Precinct illustrative massing from General Boulevard (looking north across town and local park)

Source: *Terroir/Plus*

5.12 Water cycle management

A Water Cycle Management Addendum Statement has been prepared by ADW Johnson and is provided at **Appendix H**. The statement builds on work undertaken for Mod 4 and Mod 11 and assesses the Concept Plan stormwater and water cycle management at a high level.

The statement undertook a review of the Illustrative Design Scheme, which indicates that the proposed school would be located within the same footprint as the approved Town Centre Core North-West Quadrant and is anticipated to have similar catchment parameters (i.e. impervious/pervious areas) to the already approved layout. A similar review was undertaken for the High Density Residential Precinct, which found that future development would be located in an area that previously consisted of townhouse dwellings and the internal road network. As with the school location, the catchment parameters are generally similar to those adopted in the previously approved strategy.

Therefore, the proposed catchment areas and catchment parameters will not be significantly altered from the approved scheme and as such the stormwater management controls outlined within the approved stormwater management report remain valid.

5.13 Waste management

A Revised Waste Management Plan (WMP) relating to the proposed modifications has been prepared by SLR Consulting and is provided at **Appendix I**.

The North-West Quadrant, South-West Quadrant, Town Centre East and High Density Residential Precincts have separate waste collection strategies which can operate independently from each other. Therefore, the WMP describes the waste management procedures relating to the North-West Quadrant and the High Density Residential Precinct, which are the subject areas of this modification.

The High Density Residential Precinct will have waste collected by Council vehicles weekly. The WMP calculates that 20x660L garbage and 20x660L recycling bins are required to accommodate the residential waste generation, based on the Illustrative Design Scheme. This meets the Council requirement of 55L per dwelling for weekly

collection. Spatial allowances can comfortably be accommodated in the Illustrative Design Scheme and would be subject to more detailed assessment as part of the future detailed development application. The WMP calculates that an 88.6sqm centralised waste collection area and an additional 19.4sqm area is required for bulky goods storage, of which more than sufficient space is provided in the Illustrative Design Scheme.

The North-West Quadrant will comprise school, retail and community uses that will generate waste subject to collection by a private contractor. The detailed waste collection procedure will be subject to future development applications. The WMP calculates that waste storage areas of minimum 49.4sqm for the retail uses and 61.7sqm for the school/community uses are required, based on the Illustrative Design Scheme. The Illustrative Design Scheme allocates more than sufficient area to accommodate the required waste storage.

Therefore, the proposed modifications can result in development that will appropriately manage waste disposal, subject to future development applications.

5.14 Social and community impacts

The proposed modifications have significant positive social impacts to the community. These include:

- Provision of a new secondary school within the Town Centre Core, to meet the needs of the growing population within the catchment area.
- Extension of the existing town square to form Town Square West, which will provide a civic heart for the community, connecting Eat Street with the regional park and integrating with the retail, community, and residential uses in the North-West and South-West Quadrants.
- Retention of the overall dwelling yield at Edmondson Park South, by relocating apartments displaced by the school to a new High Density Residential Precinct, thereby continuing to provide housing choice and stock to the community.
- Locating a school within the Ed. Square Town Centre Core, close to housing, public transport, vast open spaces and community and retail uses.

Note that the future school development application would be accompanied by a Social Impact Assessment that would provide a detailed assessment of the social impacts associated with the proposal.

5.15 Statement of commitments

The Statement of Commitments remains unchanged from previous approved Concept Plan and subsequent modifications.

5.16 Reasons given for granting consent

The original Concept Plan assessment report stated that the proposal:

- Was considered to be in the public interest as it provides an area for additional urban zoned land to meet the demands of a growing population in the south west region of Sydney.
- Will assist in the delivery of key outcomes of the NSW State Plan, the Metropolitan Strategy and the draft South West Sub-Regional Strategy.
- Will release residential land within the South West Growth Centre and establish the Edmondson Park Town Centre.
- Is considered to provide environmental, social and economic benefits to the region, subject to modifications, further assessment requirements and conditions.

The proposed modifications remain consistent with the abovementioned reasons for granting approval to the original Concept Plan. In particular, the proposal will not change the approved area of urban zoned land or overall dwelling yield. It will also provide further social and economic benefits to the region including a new school, public spaces and new apartment housing.

In addition to the above, the proposal remains consistent with the reasons for granting approval to Mod 4, which sought to establish Ed. Square and the Town Centre Core. The proposal will contribute to the success and viability

of the Town Centre Core. It provides building heights that are consistent with the Town Centre Core and will provide apartments that will contribute to the diversity of housing stock in the area. The Public Domain Plan also continues to provide a well-considered structure for Ed. Square that encourages walkability and provides landscaping.

5.17 Site suitability and public interest

The suitability of the site for development as the Ed. Square Town Centre and associated residential uses was established by the original Concept Plan and subsequent MOD 4. This modification does not change the site suitability. The school is considered to be suitable for the site for the reasons described in **Section 3.1.1**. Apartment development and the associated heights and GFA in the High Density Residential Precinct are considered to be suitable for the site as discussed in **Section 3.1.2** and **Section 5.4**.

The proposed modifications are also considered to be strongly in the public interest since they:

- Will facilitate the delivery of a new secondary school in the Town Centre Core, catering to the needs of the existing and future catchment population.
- Result in no loss of residential yield, contributing to future housing stock and diversity in Ed. Square.
- Will facilitate the delivery of new open space, in particular Town Square West.
- Will generate construction and operation jobs associated with the future development of the site.

Therefore, the proposed modifications are considered to be suitable for the site and in the public interest.

6.0 Conclusion

The proposed Modification Application seeks to facilitate the future development of a new required NSW Department of Education secondary school in the North-West Quadrant of the Town Centre. The school will deliver important infrastructure to serve the growing population of the local area in a highly accessible location. Its integration into the town centre also reflects Fraser's on-going commitment to make Ed Square the benchmark for mixed use places. The introduction of the school will necessitate relocation of approved residential apartments out of the Town Centre Core to the Residential Precinct 3 Stage 9 (now known as the 'High Density Residential Precinct'), with no additional dwellings proposed beyond the currently approved total yield. Specifically, it seeks to make the following modifications to the Concept Plan:

- Amend the Ed. Square Design Guidelines (Design Guidelines) to:
 - Update the vision, principles, key elements and urban structure to reflect the introduction of the school and new relocated High Density Residential Precinct.
 - Provide design guidance for future development of the school and the High Density Residential Precinct.
- Introduce the Ed. Square Public Domain Plan – Town Centre West and RP3 Modification 12 (Public Domain Plan) to guide the future design of public domain relating to:
 - Town Square West (an extension of the existing town square through Town Centre West).
 - The school in the North-Western Quadrant.
 - The High Density Residential Precinct.
- Introduce maximum Gross Floor Area (GFA) and building heights to the High Density Residential Precinct.
- Amend the existing maximum height and GFA for the Town Centre Core Quadrants to accommodate the school.
- Corresponding amendments to the conditions of approval as required to accommodate the above changes.

In accordance with Schedule 2, Clause 3BA(5) of the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017*, the consent authority may modify the consent as:

- The proposed modification is of minimal environmental impact; and
- Is substantially the same development as the project for which the consent was granted.

Furthermore, the Concept Plan, as proposed to be modified, remains suitable for the site and is in the public interest.