

16 June 2022

Ed. Square MOD 12 – Response to Agency and Council Submissions

Category	Issue	Response
Department of Planning and Environment – Key Issues Letter (Comments)		
Mod 11	1. It is noted that the proposed plans and documents include the changes proposed under MOD 11. Should MOD 11 not be finalised prior to the determination of this application, the MOD 12 documents will be required to be updated accordingly.	Noted. Refer to Section 4.1 of the RtS Report. MOD 11 was determined on 6 May 2022. Therefore, the MOD 12 documentation includes all changes approved under MOD 11 to ensure consistency in approval documents and avoid confusion.
Open Space	2. Please provide additional shadow diagrams clearly illustrating the change in solar access within the town centre core and town park as between the approved, MOD 11 and MOD 12 proposals.	Shadow diagrams have been provided at hourly intervals, mid-winter, for the MOD 11 (same as approved MOD 4) and MOD 12 Indicative Reference Schemes. Refer to Appendix D where these diagrams are presented side-by-side for ease of comparison. An assessment and comparison of the shadow impacts to the Town Centre Core (in particular Town Square West) and the Town Park is provided in Section 4.2.1 and Section 4.3.4 of the RtS Report.
	3. An assessment of the indirect impacts associated with the introduction of the school use adjacent to the Regional Park is required.	Refer to Section 4.2.2 of the RtS Report. No direct works are proposed in the Regional Park. Some access may occur to the Regional Park from the school. The impacts of MOD 12 are assessed at Section 4.2.2 of the RtS Report.
	4. Additional justification for the proposed amendment of the deep soil requirements in the Design Guidelines is required.	Refer to Section 4.2.3 of the RtS Report. Guidance on the provision of deep soil specific to Ed. Square has been included.
	5. Consideration of increased canopy cover and the use of native species is required.	Refer to Section 4.2.3 of the RtS Report. The Design Guidelines have been amended to include canopy targets where they previously did not. The Public Domain Plan has been amended to include a target of 75% native species in public domain areas.
Urban Design	6. Please provide additional details (rationale and GFA distribution diagrams) regarding the proposed changes in height and GFA within the town centre core and the proposed distribution within the High-Density Residential Precinct, outlining how the GFA and height changes correlate.	Refer to Section 4.3.1 of the RtS Report.
	7. Provide a breakdown of the approximate number of residential dwellings between the Town Centre Core and Residential Precincts.	A breakdown of the approximate number of residential dwellings in each precinct is provided at Appendix D . The approximate breakdown is as follows: <ul style="list-style-type: none"> • TCC East: 427 apartments. • TCC West: 401 apartments. • RP1: 348 townhouses. • RP2: 205 townhouses. • RP3 S7-8: 93 townhouses. • RP3 S9 (High Density Residential): 410 apartments

Category	Issue	Response
		<ul style="list-style-type: none"> TOTAL: 1884 dwellings
	8. Please update the Design Guidelines to include additional requirements (at a similar level of detail to the other precincts) to ensure the High-Density Residential Precinct will achieve good design outcomes.	Amended Design Guidelines have been provided at Appendix C . Refer to Section 4.3.1 and Section 5 of the RtS Report for further detail.
	9. The Design Guidelines are to be updated to include measures to facilitate an appropriate transition and scale of buildings above the podium level adjoining the park and medium-density residential precinct.	Amended Design Guidelines have been provided at Appendix C . Refer to Section 4.3.1 and Section 5 of the RtS Report for further detail.
	10. The maximum permissible height for RP3 Stage 9 should be lower than or equal to the tower on the opposite side of Soldiers Parade to achieve the required transition in built form towards the Medium Density Precinct	Refer to Section 4.3.1 of the RtS Report and the Design Response provided at Appendix D for a detailed response.
	11. Please clarify the changes to the pedestrian network, including removal of mews and laneways from the eastern most portion of the medium density residential precinct	<p>The only material changes proposed to the pedestrian network are those within the High Density Residential Precinct allotment (former Residential Precinct 3 Stage 9). This is due to the change in typology from townhomes with laneways and streets to a podium/tower residential apartment form. The High Density Residential Precinct allotment will be covered by a common podium form and therefore there will be no internal pedestrian network. No other changes to the pedestrian network are proposed beyond those in MOD 11, as reflected in the Public Domain Plan provided at Appendix F.</p> <p>The mews and laneways under question in the MOD 11 documents were shown in dark purple, which is to indicate existing mews and laneways. This was an error since the mews and laneway do not exist yet. The MOD 12 Public Domain Plan (Appendix F) correctly identifies these mews and laneways in light purple, was 'indicative future location'. Therefore, this change is to correct an error only and does not represent a change to the proposal.</p>
Traffic and Transport	12. Please update the traffic impact assessment as required by TfNSW and Council. The Department notes that further traffic assessment will be undertaken as part of the SSD for the school, but sufficient detail to enable a broad assessment of the impacts of the proposed Concept Plan modification is required at this stage.	Refer to Section 4.4 of the RtS Report and the Traffic Response provided at Appendix H for detail.
Bushfire	13. Clarify the APZ provision adjacent to the proposed school lot and confirm that no encroachment into the Regional Park is required.	Refer to Section 4.5 of the RtS Report and the Bushfire Statement provided at Appendix I . A 43m APZ is proposed from the edge of the Regional Park. No encroachment into the park is required.
Flooding and Stormwater	14. Please clarify any changes to the proposed drainage strategy and overland flooding impacts associated with the modification.	Refer to Section 4.6 of the RtS Report. No changes to the approved drainage strategy are proposed. Flooding impacts will be further considered with the relevant future development applications.
Heritage NSW (Comments)		
General	The proposed development is unlikely to have any major impacts upon the heritage significance of the SHR items in the vicinity ((Ingleburn Military	Heritage NSW's comments are noted and no further response is required.

Category	Issue	Response
	<p>Heritage Precinct and Mont St Quentin Oval – SHR no. 01891). Therefore, no comment is warranted.</p> <p>The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.</p>	
Liverpool City Council (Comments)		
Open Space and Recreation	<p>The proposed relocation of the residential apartment towers along the northern edge of the Town Park will create overshadowing in winter (between 1-3 pm) and affect the solar amenity for the Town Park.</p> <p>Whilst the MOD does not propose construction of the high school, it will facilitate the positioning of a school within the town centre core. The provision of sports field for the future high school will be an issue as sports field are typically located within the school premises. It should be noted that the future provision of sports field along Zouch Road is approximately 1km or at 15-minute walking distance from the future high school location, which is not within a convenient distance from the high school premises. The MOD may preclude a reliance on a Council owned and operated facilities to cater for school needs, which will make the facility unavailable to the public for certain hours of the day. Outside of a formal agreement with Council, the DET must demonstrate that open space / sporting facilities can be reasonably catered for, without relying on Council facilities.</p>	The comments by Council are noted.
	<p>1. Consider amending building heights along the northern edge of the Town Park to reduce overshadowing on the Town Park in winter.</p>	Refer to Section 4.3.1 and the Design Response provided at Appendix D . The proposed heights along the northern edge of the Town Park, along with the proposed amended Design Guidelines, will allow for the Town Park to receive a minimum of four hours sunlight to at least 50% of its area on the shortest day of the year. This represents best practise for public open space.
	<p>2. Sports field provision for the Primary School site at Buchan Avenue should be shared with the future high school. Council recommends expanding the existing Primary School site in Town Centre North to accommodate the sports field provision for the high school.</p>	Consideration of shared use and expansion of the Primary School facilities is outside the scope of this Concept Plan modification. The open space strategy for the new school will be further considered by SINSW and provided with the SSD Application for the future development. This is expected to be lodged later in 2022.
Urban Design and Public Domain	<p>The following comments are provided in relation to the submitted Design Guidelines:</p> <p>It is noted that the applicant has included the changes proposed (but not approved)</p> <ul style="list-style-type: none"> as part of MOD11 within the current modification application (MOD12). 	Noted. Refer to Section 4.1 of the RtS Report. MOD 11 was approved by DPE on 6 May 2022.

Category	Issue	Response
	<ul style="list-style-type: none"> A clear indication of all the changes being proposed in the Design Guidelines and the Public Domain Plan has not been provided. 	<p>A tracked changes version of the Design Guidelines has been provided. A tracked changes version of the amended Design Guidelines is provided at Appendix C.</p>
	<ul style="list-style-type: none"> The design characteristics tables (Table 3 - 7) in the Design Guidelines is not readable and requires separate headings. 	<p>The Design Characteristics Tables relate to the residential precinct housing (excluding the High Density Precinct), which not subject to this modification (which applies only to the Town Centre Core and the High Density Residential Precinct).</p>
	<ul style="list-style-type: none"> The Design Guidelines lacks in providing design outcome and performance criteria for all development types within High Density Residential Precinct and Educational Uses. 	<p>Future development in the High Density Residential Precinct and for the education use will be required to comply with other planning policies that lie outside the Design Guidelines.</p> <p>For the High Density Residential Precinct, future development will be required to comply with the Apartment Design Guide, which will ensure a high quality and high amenity outcome. The Design Guidelines have been drafted to avoid any duplication of requirements from other policies such as the ADG. The Design Guidelines include built form and design controls that are specific to the site, including limiting overshadowing to the Town Park, distributing massing so that a transition from the Town Centre Core to the Medium Density Precincts is achieved, and so that certain sustainability requirements are met. The Design Guidelines have been amended as part of this RtS to further encourage transitioning of heights from the Town Centre Core to the Medium Density Residential Precincts. In addition, the future development application will be reviewed by the Liverpool Design Excellence Panel in accordance with their normal review policy.</p> <p>For the education uses, future development will be required to demonstrate consistency with the requirements of Chapter 3 and the Design Quality Principles of <i>SEPP Transport and Infrastructure (2021)</i> and the GANSW Design Guide for Schools. The School SSD Application will also be subject to consultation with the NSW State Design Review Panel to ensure a high quality design outcome is achieved. In addition, functional requirements for schools are dictated by the NSW Department of Education Educational Facilities Standards & Guidelines (EFSG). Therefore, the Design Guidelines have been drafted so as to not double up on controls and requirements that would be covered by these separate policies.</p> <p>In summary, while some design metrics have been included for the High Density Residential Precinct and the education use, the Ed. Square Design Guidelines are not the appropriate document to re-interpret and present the very specific controls that exist in other policies such as the ADG, the EFSG, the T&I SEPP and the Design Guidelines for Schools.</p>
	<p>The following comments are provided in relation to the submitted Public Domain Plan:</p>	<p>The connection to the Regional Park shown on the Pedestrian Network Plan is subject to appropriate entry points to the park. Due to level changes along Macdonald Road, the actual entry points to the park are likely to be to the north</p>

Category	Issue	Response
	<ul style="list-style-type: none"> The pedestrian network plan identifies a connection from Town Centre West through to Edmondson Regional Park (across Macdonald Road). This connection is not evident in the drawings and needs further details. 	<p>and south of the yellow arrow on the plan which extends directly from Town Square West into the park. Therefore, the arrow shown on the plan does not depict the final detailed access points to the park and instead seeks to acknowledge, at the conceptual level, that there is a connection into the park and that the Ed. Square pedestrian network has considered this connection in its layout.</p>
	<ul style="list-style-type: none"> A much stronger physical / visual connection across Macdonald Road and Town Plaza West is required and therefore requested. 	<p>Council's comment is noted. A strong physical/visual connection can be explored as part of the future detailed DA that seeks to construct Town Plaza West. We note that the DA would be presented to Council's Design Excellence Panel and the design would have to address their comments. The Public Domain Plan includes a vision and concept layout for Town Square West, which is envisaged as a "vibrant and active public space that acts as the transition between Edmondson Regional Park to the west and Town Square East." It will provide "an extension of Town Square East as well as Eat Street and visually connects to the Regional park to the west."</p> <p>Any future DA would be required to demonstrate consistency with the Public Domain Plan, including these vision statements contained in Section 4.</p> <p>Further, Urban Design Principle 2 in the Public Domain Plan is for "Clear lines of sight through the site connecting public open spaces." This principle will also guide the design of future DAs.</p>
	<ul style="list-style-type: none"> The proposed 40% canopy cover being proposed for public domain areas does not align with the canopy cover targets being set by the Design and Place SEPP. 	<p>The draft Design and Place SEPP did not apply to this Concept Plan Modification and has since been repealed. Therefore, the targets within the policy are not relevant to this application. A description of the tree canopy coverage targets set in the Concept Plan is provided at Section 4.2.3 of the RtS Report.</p>
	<ul style="list-style-type: none"> The public domain plan lacks in providing clear articulation of the building features, public domain treatments and built form articulations at the North-West Quadrant of the town centre. 	<p>The features and articulation of buildings adjacent to the public domain will be considered in the future detailed DAs that seek their construction. The DAs will be subject to review by Liverpool Council's Design Excellence Panel or the NSW SDRP and will demonstrate a high quality design and integration with the public realm.</p>
	<ul style="list-style-type: none"> Detailed interface treatments (i.e. between the nature reserve and town centre, streets and built form, etc.) have not been provided as part of the design documentation. 	<p>Detailed interface treatments with the public realm will be considered at the future DA stage and are beyond the scope of the Concept Plan. Urban Design Principle 7 in the Public Domain Plan is for a "Town Centre with a mix of uses including residential, retail and community uses to ensure safe, active and interesting street edges." This principle will help guide how future DAs provide active edges with the public domain. Further, the future DAs will be presented to the NSW SDRP and/or Council's Design Excellence Panel to ensure a high quality outcome is provided.</p>
	<p>The following comments are provided in relation to the submitted Illustrative Design Report:</p>	<p>Council comments are noted. A design response to the potential north-south orientation of the school is provided at Appendix E and discussed at Section</p>

Category	Issue	Response
	<ul style="list-style-type: none"> The general built form principles for the tower arrangements (i.e., a North-South orientation) is being followed within the precinct to maximise solar amenity, however, the high-rise school building is proposed to be oriented in the East-West direction. 	4.3.3 of the RtS Report. The layout of the school will be subject to a separate SSD Application.
	<ul style="list-style-type: none"> The proposed height limit for RP3 Stage 9 (i.e., RL 103) is higher than the adjoining tower west of Soldiers Parade (currently at RL 97.15). The maximum permissible height for RP3 Stage 9 should be lower than or equal to the tower on the opposite side of Soldiers Parade to achieve the required transition in built form towards the Medium Density Precinct. 	Refer to Section 4.3.1 of the RtS Report and the Design Response provided at Appendix D for a detailed response.
	3. The current MOD 12 application is considered in tandem with the MOD11 application to ensure any changes to documents in the MOD11 application are captured.	Noted. Refer to Section 4.1 of the RtS Report. MOD 11 was approved by DPE on 6 May 2022. The MOD 12 documentation includes changes that were approved under MOD 11.
	4. Proposed changes to the Design Guidelines and the Public Domain Plan should be clearly identified. It is recommended to identify all the additions as ' <i>bold italics</i> ' and all the deletions as ' bold strikethrough ' in the documents.	A tracked changes version of the Design Guidelines has been provided at Appendix C .
	5. Categorise design characteristic tables (Table 3 - 7) under a separate heading in the Design Guidelines for improved readability.	The Design Characteristics Tables relate to the residential precinct housing (excluding the High Density Precinct), which not subject to this modification (which applies only to the Town Centre Core and the High Density Residential Precinct).
	6. The development types for which design characteristics are not included in the Design Guidelines, should demonstrate compliance with relevant SEPP controls.	Council's comment is noted. All SEPPs would apply as relevant for any future DAs lodged at the site. This would include Chapter 3 of the T&I SEPP (former Education SEPP), and SEPP 65. Note that the indicative reference design for the High Density Residential Precinct has demonstrated high-level compliance with the key provisions of the ADG under SEPP 65, including building separation and solar access. An assessment of the detailed proposal(s) including all relevant SEPPs will be provided with the DA documentation alongside the relevant application.
	7. A clear pedestrian priority connection be provided from Town Centre West through to Edmondson Regional Park to enable easy and safe pedestrian access.	As described above, pedestrian connections to the Regional Park are dependent on achieving appropriate entry points to the park. Due to level changes along Macdonald Road, the actual entry points to the park are likely to be to the north and of Town Square West. Therefore, it is unlikely that a direct access point will be able to be provided directly across Macdonald Road from Town Square West. Pedestrian access will be provided across Macdonald Road via a signalised crossing. This crossing will provide a visual connection across the road, as will the tree canopies within the park. Pedestrians will then be able to walk a short distance to the north or to the south to enter the park. Access from Town Square West will be further considered during the relevant DA.
	8. An anchor element or a visual marker with a plaza space be identified at the location from Town Centre West to Edmondson Regional Park to establish a	The potential for an anchor visual marker in the Town Square West will be considered at the detailed DA stage for the Town Square West. This Concept

Category	Issue	Response
	much stronger physical / visual connection across Macdonald Road and Town Plaza West.	Plan modification seeks to introduce the concept of Town Square West and its conceptual layout and feel, along with tree canopy and deep soil targets. In combination with the Urban Design Principles of the Masterplan, this will inform any future DA for the Town Square West, which will have to demonstrate consistency with the Public Domain Plan, including requirements for visual and pedestrian connections to the Regional Park across Macdonald Road. In particular, Principle 2 requires “clear lines of sight through the site connecting public open spaces” including through Town Square West, as graphically depicted in the Public Domain Plan.
	9. The proposed canopy cover proposed for public domain areas should be increased to a minimum of 50% to better align with the canopy targets set by the Design and Place SEPP.	As described above, the draft Design and Place SEPP did not apply to this Concept Plan Modification and has since been repealed. Therefore, the targets within the policy are not relevant to this application. A description of the tree canopy coverage targets set in the Concept Plan is provided at Section 4.2.3 of the RtS Report.
	10. The public domain plan clearly articulates the building features, public domain treatments and built form articulations to support the different uses being proposed in the North-West Quadrant of the town centre.	As described above, the features and articulation of buildings adjacent to the public domain will be considered in the future detailed DAs that seek their construction. The DAs will be subject to review by Liverpool Council’s Design Excellence Panel or the NSW SDRP and will demonstrate a high quality design and integration with the public realm. Detailed interface treatments with the public realm will be considered at the future DA stage and are beyond the scope of the Concept Plan. Urban Design Principle 7 in the Public Domain Plan is for a “Town Centre with a mix of uses including residential, retail and community uses to ensure safe, active and interesting street edges.” This principle will help guide how future DAs provide active edges with the public domain.
	11. Appropriate interface treatments between the nature reserve and town centre, streets and built form are included as part of the design documentation.	Council comments are noted. Macdonald Road has already been delivered. As described above, the detailed nature of treatments to building edges and the Town Square West will be subject to future DAs, which will be reviewed by Council’s Design Excellence Panel and/or the NSW State Design Review Panel, in accordance with the relevant procedures. In determining a high-quality outcome for the site, the DAs will be reviewed for consistency with the Public Domain Plan, which includes urban design principles and vision statements that require visual and pedestrian connections to the park be delivered. This will be further considered in each of the future DAs, as relevant.
	12. A North-South alignment and additional modulations are explored as part of the built form for the proposed high school to increase solar amenity for the Town Plaza West (especially for 21 June).	The Concept Plan establishes a maximum GFA and height (as well as design guidance) for the north-west quad, and does not prescribe a particular outcome. The final orientation of the school would be subject to the future SSD Application seeking the school’s construction. A Design Response has been prepared at Appendix E, Diagram 3 which describes why the Indicative Reference Scheme is oriented east-west. This response is also summarised at Section 4.3.3 of the RtS Report.

Category	Issue	Response
	13. The maximum permissible height for RP3 Stage 9 be lower than or equal to the tower on the opposite side of Soldiers Parade to achieve the required transition in height towards the Medium Density Precinct.	Refer to Section 4.3.1 of the RtS Report and the Design Response provided at Appendix D for a detailed response.
Traffic and Transport	<p>Whilst this MOD does not include a development application to facilitate the construction of a school in the north-west quadrant, the MOD does facilitate the re-allocation of height and GFA, as well as providing for higher intensity development in the new high density residential precinct. Council must be satisfied that the local road network can sufficiently cater for a high-density school in this location prior to accepting that additional GFA in this quadrant will have acceptable impacts.</p> <p>Trip generation from the proposed 2000-student high school in PM peak hour is not included in the Traffic Impact Assessment Report. Detail trip generation and distribution assumptions from the recently constructed 2000-space commuter car park are also not included in the report.</p> <p>The Traffic Impact Assessment lacks in addressing the network performance during the interim development stage, as the section of MacDonald Road construction between Station Street North and Bernera Road is not complete.</p> <p>A combination of these factors provides for an incomplete understanding of impacts to the local road network because of cumulative changes to the demands and distribution of traffic patterns is not fully understood.</p>	Refer to the detailed Transport and Traffic Response provided at Appendix H .
	<p>14. A revised Traffic Impact Assessment be submitted to Council for review, which is to address the following -</p> <ul style="list-style-type: none"> Traffic impacts of the proposed high school during the PM peak hour; Trip generation and distribution assumptions from the recently constructed commuter car park. 	Refer to the detailed Transport and Traffic Response provided at Appendix H .
	15. Additional traffic modelling analysis scenario be carried out to assess the cumulative traffic impacts of Edmondson Park South Precinct with the proposed changes on the existing network, particularly along Henderson Road and its intersections with MacDonald Road and Soldiers Parade.	Refer to the detailed Transport and Traffic Response provided at Appendix H .
	16. Queuing analysis is to be carried out to assess whether the pick-up and drop-off area along Henderson Lane is sufficient. Design of the pick-up and drop-off area along Henderson Lane is to be included in the report to demonstrate that the street has sufficient width to accommodate on-street parking.	Refer to the detailed Transport and Traffic Response provided at Appendix H .
	17. Both on-street and on-site parking provisions for staff and students of the proposed high school be included.	Refer to the detailed Transport and Traffic Response provided at Appendix H .
	18. Forecast traffic flow diagrams along key roads within the study area be included in the Traffic Impact Assessment report.	Refer to the detailed Transport and Traffic Response provided at Appendix H .

Category	Issue	Response
	<p>19. SIDRA modelling analysis be carried out for the following key intersections (but not limited to):</p> <ul style="list-style-type: none"> • MacDonald Road / Henderson Road intersection • MacDonald Road / General Blvd intersection • MacDonald Road / Bernera Road intersection • MacDonald Road / Buchan Avenue intersection • Soldiers Parade / Henderson Road intersection • Soldiers Parade / General Blvd intersection 	Refer to the detailed Transport and Traffic Response provided at Appendix H .
	20. TfNSW should be referred for traffic modelling requirements on the surrounding state road network such as Camden Valley Way and Campbelltown Road. The AIMSUM models should be endorsed by TfNSW.	Refer to the detailed Transport and Traffic Response provided at Appendix H .
	21. A copy of the modelling assumption and endorsed forecast traffic flows and network performance analysis report for the entire Edmondson Park South Precinct be submitted to Council for review.	Refer to the detailed Transport and Traffic Response provided at Appendix H .
	22. Traffic volume forecast be used to justify the proposed traffic signal locations within the town centre and warrant assessments for additional traffic signals.	Refer to the detailed Transport and Traffic Response provided at Appendix H .
	23. Main Street be designated as a high pedestrian priority street. No vehicular connection between Main Street and Henderson Lane be provided to prevent heavy traffic from using the street.	Refer to the detailed Transport and Traffic Response provided at Appendix H .
	24. A staging infrastructure plan be provided to identify delivery timing of the required road work and the planned intersection upgrades in the town centre.	Refer to the detailed Transport and Traffic Response provided at Appendix H .
Endeavour Energy (Comments)		
Utilities	<p>Endeavour Energy has noted the Environmental Assessment Report / Section 75W Modification Application indicates the modifications do not result in any change proposed to the overall dwelling yield or proposed maximum gross floor area (GFA) but there is a redistribution for each quadrant / precinct.</p> <p>As shown in the below site plans from Endeavour Energy's G/Net master facility model the Edmondson Park Town Centre is part of a 'Developer Area' (shown by the indicative road / subdivision layout) indicating enquiries and applications for contestable works projects with Endeavour Energy's Customer Network Solutions Branch for electricity supply.</p> <p>As such, Endeavour Energy's Customer Network Solutions Branch are managing the conditions of supply with the proponent and their Accredited Service Provider (ASP). However the applicant will need to contact Endeavour Energy's Network Connections Branch (via Head Office enquiries on business days from 9am - 4:30pm on telephone: 133 718 or (02) 9853 6666) if this Modification Application:</p>	Endeavour Energy's comments are noted. Future detailed DAs will address as required.

Category	Issue	Response
	<ul style="list-style-type: none"> Includes any contestable works projects that are outside of the existing approved / certified works. Results in an electricity load that is outside of the existing Supply / Connection Offer requiring the incorporation of the additional load for consideration. <p>The foregoing may change as a result of the redistribution of electricity load for each quadrant / precinct.</p> <p>Subject to the foregoing Endeavour Energy has no objection to the Modification Application.</p> <p>(refer to attached submission)</p>	
Department of Planning and Environment – Environment, Energy and Science Group (Comments)		
Regional Park (Ecology)	<p>Section 5.17 of the EA states “the school is considered to be suitable for the site for the reasons described in Section 3.1.1” and one of these reasons includes that “it has excellent accessibility and views to the Edmondson Park Regional Park” (EES emphasis) (see Section 3.1.1 of EA).</p> <p>The modification also proposes to introduce Town Square West (section 3.1 of EA). Section 5.4 of the EA indicates Town Square West is proposed as an extension of the existing Town Square to the west, connecting visually and physically to the Regional Park. The EA indicates Town Square West will strengthen the east-west pedestrian link from the reserve through to the Town Centre Core and Regional Park (Section 5.6 of EA). If pedestrian access to the Regional Park is to be strengthened by the MOD 12 proposal, the RtS should:</p> <ul style="list-style-type: none"> assess the direct and indirect impact of the MOD 12 proposal on the Regional Park. The relevant guidelines are NPWS (2020) Developments adjacent to NPWS lands: Guidelines for consent and planning authorities, National Parks and Wildlife Service, Department of Planning Industry and Environment, Sydney, NSW at the following link: https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Development-guidelines/developments-adjacent-npws-lands-200362.pdf 	Further consideration of potential impacts to the Regional Park has been provided at Section 4.2.2 of the RtS Report, including consideration of the Guidelines.
	<ul style="list-style-type: none"> assess the impact of increased numbers of people (including by the school) accessing and using the Regional Park as this is likely to place additional pressure on the Regional Park and impact native flora and fauna. 	Further consideration of potential impacts to the Regional Park has been provided at Section 4.2.2 of the RtS Report, including a description of how the school might result in increased usage of the park and the impacts of such usage.
Bushfire (APZ)	Section 5.9 of the EA notes 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. The APZ Assessment (Appendix J) indicates the school in the North-West Quadrant would require additional bushfire protection since it is	A 43m APZ (performance solution) is proposed with no works required within the Regional Park. Refer to Section 4.5 of the RtS Report and Appendix I for further detail.

Category	Issue	Response
	<p>defined as a Special Fire Protection Purpose Development (SFPP). Appendix J notes:</p> <ul style="list-style-type: none"> Eco Logical Australia (5 August 2021) recommend a 50m APZ from the woodland vegetation on the western side of MacDonald Road using the NBC Bushfire Attack Assessor, these slopes result in an APZ of 43m for Town Centre NW as mapped in Figure 1. <p>Section 5.2 of the EA indicates revised maps including a Bushfire Asset Protection Zones map will supersede those currently approved under MOD 4 and those submitted with MOD 11 (page 24). EES notes:</p> <ul style="list-style-type: none"> The amended Edmondson Park South Bushfire Asset Protection Zone Map in Appendix E provides a 43-50m wide APZ to protect the SFPP Figure 1 (Attachment A) in Appendix J shows a 43m wide APZ for the SFPP Figure 31 in the EA shows a 43m wide APZ for the SFPP. Section 5.9 of the EA states “The letter recommends that a minimum 43m asset protection zone (APZ) be applied to the North-West Quadrant...”. <p>The RtS should clarify if the APZ for the school should be 43m or 43-50m as shown on the amended Edmondson Park South Bushfire Asset Protection Zone Map.</p>	

Category	Issue	Response
	<p>It is important the MOD 12 proposal provides an adequate APZ (and any other bushfire protection measures) within the boundary of the SFPP land and /or Macdonald Road which is located between the school site and the Regional Park. Any APZ measures must be located entirely outside the Regional Park within the development area. This is consistent with Condition 1.10 of the Edmondson Park Concept Plan Instrument of Approval (MP10-0118) dated 18 August 2011 which states:</p> <p><i>1.10 Future subdivision applications are to demonstrate that the APZs are located outside any area of public open space, unless agreed to by the relevant council, and outside the regional park, unless agreed to by Office of Environment and Heritage.</i></p> <p>Under no circumstances should the proposed MOD 12 development require any clearing of vegetation in the Regional Park for bushfire protection or for any other reasons.</p>	<p>As per the above, no clearing of vegetation, or any works, will be undertaken in the Regional Park in relation to the establishment or management of the required 43m APZ (which is measured from the edge of the Regional Park). Refer to Section 4.5 of the RtS Report and Appendix I for further detail.</p>
	<p>In addition to the RtS providing further details on the APZ requirements, it is recommended the MOD 12 proposal considers factors such as the ability to safely evacuate the school during a potential bushfire in the Regional Park.</p>	<p>Refer to Section 4.5 of the RtS Report and the Bushfire Statement at Appendix I. Safe evacuation routes are available and will be subject to a future application.</p>
	<p>The Illustrative Design Scheme Report notes Henderson Lane will be used for direct access to school – priority drop off/pick (page 23). Henderson Lane links between Macdonald Road and Sergeant Street and allows for one-way traffic with an exit only onto Macdonald Road (see Illustrative Design Scheme Report, page 25).</p>	<p>Refer to Section 4.5 of the RtS Report and the Bushfire Statement at Appendix I. Safe evacuation routes are available and will be subject to a future application.</p>
	<p>Macdonald Road is one of two main north-south roads within the Ed. Square site and is located between western boundary of the school site and the eastern boundary of the Regional Park. Due to the proximity of Macdonald Road to the Regional Park it may not provide a safe evacuation route during a bushfire (see Figure 31 in the EA). The RtS should provide details on the proposed evacuation route from the school site.</p>	<p>Refer to Section 4.5 of the RtS Report and the Bushfire Statement at Appendix I. Safe evacuation routes are available and will be subject to a future application.</p>
	<p>Section 4 of the EA states “the proposed amendments will not give rise to any new or different environmental impacts than those originally considered”. Locating the school near the Regional Park must not result in any impacts on the Regional Park.</p>	<p>Noted. No works are proposed to the Regional Park and an assessment of potential impacts has been provided at Section 4.2.2 of the RtS Report. A more detailed assessment of the school’s impacts to the Regional Park will be undertaken for the SSD Application that seeks construction of the school.</p>
Water Cycle Management	<p>The Water Cycle Management Plan (Appendix H) for this MOD 12 proposal states that the “stormwater management approach outlined within the J Wyndham Prince (JWP) report (16 March 2016) remains relevant to the proposed modification” (section 3, page 2). EES in its submissions on the MOD 11 proposal (dated 26 July 2021 and 12 January 2022) raised concern that Section 5.6.1 of the JWP report indicates investigations are currently being undertaken to assess the viability of utilising the existing rail culvert structure 1 as the pathway for draining stormwater from the Frasers Town Centre</p>	<p>No changes are proposed to the water cycle management system beyond that approved in MOD 4. We understand that changes to the water cycle management system were subject to discussions between the proponent, DPE and EESG during MOD 11, but were subsequently removed from the application.</p>

Category	Issue	Response
	development towards Raingardens 13 and 14 (Option 1) and that this investigation would include identifying any National Parks & Wildlife Services (NPWS) constraints that may be imposed should any of these works be installed on NPWS land.	
	<p>EES previously raised concern that:</p> <ul style="list-style-type: none"> the MOD 11 had not considered the biodiversity impacts and conservation values of the WQ14 link, the potential direct and indirect biodiversity impacts of constructing the WQ14 link or the consistency of the proposed regional drainage infrastructure condition with the State Environmental Planning Policy (Sydney Region Growth Centres (Growth Centres) SEPP. EES noted in its submission that the proposed indicative drainage solution is partly located on non-certified land intended under the Concept Plan approval for conservation within Edmondson Park Regional Park. This land contains vegetation of the critically endangered ecological community Cumberland Plain Woodland (CPW). 	In light of the above, no further consideration of biodiversity impacts to the Regional Park is required since no change to the approved water management system is sought beyond that assessed and approved under MOD 4.
	<ul style="list-style-type: none"> there has been no consideration of the biodiversity values associated with this land or any investigation of alternative routes and /or methods of construction that would avoid or minimise those impacts. 	In light of the above, no further consideration of biodiversity impacts to the Regional Park is required since no change to the approved water management system is sought beyond that assessed and approved under MOD 4.
	Section 5.2 of Appendix H notes revised maps of the Edmondson Park South precinct have been amended including the Water Cycle Management Strategy map and the revised maps will supersede those currently approved under Mod 4 and those submitted with Mod 11. Based on the amended Water Cycle Management Strategy map it is unclear if any part of the proposed drainage solution will be located within Edmondson Park Regional Park.	This proposal no longer seeks to include any amendments to the water cycle management strategy. Approval is not sought for any drainage channel located within the Regional Park.
	As the WQ14 link has the potential to impact CPW within the Regional Park, EES previously recommended the MOD 11 proposal undertakes an assessment and the WQ14 link be amended to avoid and/or minimise impacts on biodiversity values. EES noted important details are lacking about the scale, area, intensity, method and duration of works associated with the WQ14 link, and this may have a bearing on the level of direct and indirect impacts on biodiversity values	As per the above, no approval is sought for any drainage channel located within the Regional Park and thus no additional assessment is required.
	The RtS for MOD 12 needs to clarify if it is proposed to locate the drainage solution within the Regional Park. EES does not support the locating WQ14 link in the Regional Park, As noted above, the proposed modification should not give rise to any environmental impacts on the Regional Park.	As per the above, no approval is sought for any drainage channel located within the Regional Park and thus no additional assessment is required.
Landscaping	The Design Guidelines note an east-west green spine (General Boulevard) will connect the Regional Park in the west to the future Edmondson Park reserve in the east (page 14). The Public Domain Plan indicates opportunities exist to extend the CPW vegetation within the development, particularly along the	Refer to Section 4.2.3 of the RtS Report for a detailed response. The Public Domain Plan (Appendix F) has been amended to set a target for the use of native species.

Category	Issue	Response
	<p>heavily landscaped General Boulevard (page 04). EES supports enhancing a green link between the Regional Park and the Edmondson Park reserve and recommends the General Boulevard and any other landscaping /planting on the site uses a mix of local native provenance species from the relevant native vegetation community that occurs or once occurred on the site rather than use non-native or exotic species. This includes planting local native provenance species on private land in the residential precincts and the public open space areas/ public domain, the Town Square, the parks, Edmondson Park Reserve, the landscaped buffer along the full length of Campbelltown Road and along the streets within the Ed Square site (page 14 of Design Guidelines).</p>	<p>We note that General Boulevard has already been delivered and no changes are proposed under this application.</p>

Category	Issue	Response
	<p>EES recommends:</p> <ul style="list-style-type: none"> the Public Domain Plan is amended to outline that local native provenance plants should be used on the site, particularly as the Plan states “each DA is to demonstrate general consistency with the Plan” 	<p>Refer to Section 4.2.3 of the RtS Report for a detailed response. The Public Domain Plan (Appendix F) has been amended to set a target for the use of native species.</p>
	<ul style="list-style-type: none"> a condition of consent is included to this effect that landscaping/planting on the Ed. Square site is to use local native provenance species from the relevant native vegetation community (rather than use non-native or exotic species). 	<p>As described above, the Public Domain Plan has been amended to include a target for the use of native species in Ed. Square. Condition 1.3 of the Concept Plan approval requires that future DAs must be consistent with the approved Public Domain Plan – therefore this target will be considered and achieved in future applications. As such, condition of consent on the Concept Plan Approval is not necessary to achieve a certain proportion of native species.</p>
	<p>The Illustrative Design Scheme and Design Report shows trees on the Ed. Square site are to be planted in rows along the streets and park edges (see figure below from page 13). EES recommends the trees are not all planted in a straight line and the planting consists of a diversity of relevant local native provenance tree, shrub and groundcover species.</p>	<p>The comment made by EESG is noted. The Illustrative Design Scheme is one potential outcome and approval is not sought under this application for the arrangement of planting shown in the Indicative Reference Scheme. Similarly, the Urban Design Report seeks to articulate the urban design thinking and principles that have informed the Concept Plan proposal and does not seek approval for the arrangement of street trees. The final arrangement of street trees (that have not already been delivered) will be subject to separate applications.</p>
	<p>It is recommended the proponent sources local native provenance plant species particularly trees and/or growing local trees as soon as possible, so the trees to be planted across the Ed Square site are advanced in size to assist improve the urban tree canopy and local biodiversity. It is recommended the Public Domain Plan is amended to address this and a condition of consent is included to this effect.</p>	<p>The comment made by EESG is noted. Mature and advanced trees will be planted where feasible. Approval for the installation of trees will be subject to a separate future application and is not sought under MOD 12. Therefore amendments to the Public Domain Plan or imposing a condition of consent on the Concept Plan are not considered appropriate in this circumstance.</p>
Flooding	<p>The development footprints of the proposed modification (i.e. a school at the north-west location of the Edmondson Park Town Centre and residential dwellings at Residential Precinct 3) are in the upper reach of Maxwells Creek, which is a tributary of Cabramatta Creek. The flood risk map from the above flood study report indicates that the development sites are above the PMF level and would be unlikely to be impacted by mainstream flooding from Maxwells Creek.</p> <p>However, the development sites may be located along the overland flow paths and impacted by overland flooding. The proponent will need to undertake an assessment of overland flooding conditions and the development of overland flood risk management plan to mitigate any potential overland flooding risks.</p> <p>EES does not have any specific flood related comments on the proposal subject to an assessment of overland flooding conditions and the development of an overland flood risk management plan during the design and construction stages of the development sites.</p>	<p>The comment by EESG is noted and no further response is required in association with this application. Flood risks will be assessed further during the detailed DA stage for each development, as relevant.</p>

Category	Issue	Response
Transport for NSW (Comments)		
Traffic: 1. Cumulative impact of MOD 5	<p>Issue: It is understood that MOD 5 is currently under-assessment, which proposes an uplift of residential yield from 440 dwelling (MOD 4) to 3200+ dwellings (MOD 5), which will significantly impact on the surrounding road network in particular the intersections along Soldiers Parade and Campbelltown Road.</p> <p>Recommendation: Cumulative impact assessment with MOD5 should also be considered in MOD 12, due to the significant cumulative traffic impact of both modifications on the road network.</p>	Refer to the detailed Transport and Traffic Response provided at Appendix H .
Traffic: 2. Traffic signal warrant	<p>Issue: Table 6 states that the traffic signal warrant will be met for the proposed mid-block signalised foot crossing at MacDonald Road, with the assumption (notes under the table) that there is potential for growth as the School development occurs. However, there is no information being provided to support this claim.</p> <p>Recommendation: Further supportive information should be provided.</p>	Refer to the detailed Transport and Traffic Response provided at Appendix H .
Traffic: 3. Henderson Road Pedestrian Crossing	<p>Issue: The proposed pedestrian crossing on Henderson Road to the east of Sergeant Street is not supported as it is located quite close to the signalised intersection of Henderson Road and Soldiers Parade where there is an existing crossing point for pedestrians.</p> <p>Recommendation: Further pedestrian desire line analysis should be undertaken to identify the need and the suitable location of the proposed pedestrian crossing.</p>	Refer to the detailed Transport and Traffic Response provided at Appendix H .
Traffic: 4. School traffic information	<p>Issue:</p> <ul style="list-style-type: none"> The TIA does not provide adequate information regarding the proposed school, such as transport mode split ratio, distribution and etc. The proposed catchment of the school is not conducive to walking and cycling to school from the Leppington Area. <p>Recommendation: Further information related to the school should be provided.</p>	Refer to the detailed Transport and Traffic Response provided at Appendix H .
Traffic: 5. Intersection analysis	<p>Issue:</p> <ul style="list-style-type: none"> The TIA does not assess whether the endorsed intersection configuration (including number of approach lanes, length of turning lane and etc) along Campbelltown Road is adequate to accommodate the increased traffic 	Refer to the detailed Transport and Traffic Response provided at Appendix H .

Category	Issue	Response
	<p>generated by the proposed school, as well as with the cumulative traffic generation from MOD 5.</p> <ul style="list-style-type: none"> The Aimsun is inadequate to assess the intersection performance. <p>Recommendation: Further SIDRA traffic modelling should be undertaken to assess the intersection performance and the need/associated funding for upgrading or road improvement works to minimise the traffic impact on intersections along Campbelltown Road.</p>	
Traffic: 6. Traffic modelling files	A copy of the traffic modelling files should be submitted to TfNSW for review.	Refer to the detailed Transport and Traffic Response provided at Appendix H .
Traffic: 7. Traffic volumes	<p>Issue: The traffic volumes in the Appendix B of the Option Assessment Report shows that Soldiers Pde will have less traffic in S3 scenario than S1 scenario. This doesn't make sense as the approach will experiences less traffic when adding 1000 school trips to the precinct.</p> <p>Recommendation: Traffic assignment assumptions in the Aimsun model should be revisited.</p>	Refer to the detailed Transport and Traffic Response provided at Appendix H .