

16 June 2022

Ed. Square MOD 12 – Response to Public Submissions

Matter raised	No. of times raised	Response
Impacts of additional Gross Floor Area (GFA) not acceptable or fully considered	3	There is no overall change in GFA within the Town Centre Core. An explanation and further assessment of the proposed GFA and height has been provided at Section 4.3.2 of the RtS Report. In addition, an additional assessment relating to the bulk and scale, visual impact and transition in built form within the High Density Residential Precinct is provided in Section 4.3.1 of the RtS Report and the Design Response at Appendix D . The impacts of the additional GFA have been considered in all other key areas of assessment, including transport and traffic. Amendments to the Design Guidelines (Appendix C) will ensure an appropriate built form outcome within the High Density Residential Precinct.
Cumulative traffic and parking impacts on surrounding roads	3	The Transport Impact Assessment submitted with the modification application assessed a range of different scenarios and included surrounding changes to the network and surrounding development in its cumulative assessment as relevant, including consideration of timing for completion of each item. Refer to the Traffic Response at Appendix H for further clarifications of the cumulative impacts assessed in the Transport Impact Assessment and why they were included or omitted.
Noise impacts, including from play area and cumulative impacts from Eat Street, traffic, town centre, other uses	3	This modification to the Concept Plan does not seek to construct any development. A detailed assessment of the acoustic impacts of each use will be undertaken with the relevant future development application that seeks construction (i.e. the school, the south-west quadrant and the High Density Residential Precinct). Cumulative impacts will be considered in each application and the existing background noise levels will be established from measurements that will capture background noise from existing uses such as eat street. Appropriate mitigation measures will be developed and implemented with each of these DAs.
Proposed building heights for the High-Density Residential Precinct inappropriate	2	Refer to Section 4.3.1 of the RtS Report for a discussion of the building heights and transition to lower scale areas of Ed. Square. A Design Response is also provided at Appendix D . The Design Guidelines have been amended to ensure an appropriate distribution of heights and massing is achieved in future development applications, that will transition in height from the Town Centre Core to the Medium Density Residential Precincts.
Overshadowing impacts (including to existing residents in Easton and Emerson Buildings)	2	Refer to Section 4.3.4 of the RtS Report and Appendix D for a discussion of overshadowing impacts within the Town Centre Core. The Indicative Reference Scheme for MOD 12 includes the school building and moves the landmark tower to the west, generally resulting in less overshadowing to the Town Square West and the existing Town Centre East apartments.

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View impacts (including to existing residents in Easton and Emerson Buildings)	2	A view assessment for the amended Town Centre West Indicative Reference Scheme was provided with the Environmental Assessment originally lodged. The assessment demonstrates that from public vantage points and nearby apartments in Town Centre East, views will be improved, with the introduction of Town Square West opening up view corridors towards the Regional Park. It is accepted that there will be some change to views associated with the introduction of the High Density Residential Precinct, including the existing Emerson and Easton buildings. These impacts are not considered unreasonable and are manageable. The new buildings in the High Density Residential Precinct will achieve acceptable building separation and visual privacy from the existing buildings. The future apartments do not prevent the retention of oblique and other views that remain visible to residents of existing buildings. It is noted that the views affected previously would have been of residential dwellings in the residential precincts, while the oblique views that are retained are of higher value and include views to the Town Park to the south-east and views to the parkland in the north-east.
Location of school not appropriate (within Town Centre) and suitability of selected site	2	The proposed school use is permissible in the zone. The site is suitable for the development since it seeks to accommodate a mixed-use town centre. The school will be a NSW Government Secondary School that is required to service the growing population in the area. Its location in the town centre core is adjacent to public transport connections including Edmondson Park Rail Station. The integration of the school into the town centre core represents Frasers commitment to creating a genuine community and also reflects the modern, future-focussed thinking of the NSW Department of Education in providing innovative state of the art facilities. The site is considered suitable for the proposed school use.
Change to proposed design not disclosed during purchase of property	2	The proposed modification subject to MOD 12 was not known at time of purchase. Frasers undertook community consultation prior to lodgement of the MOD 12 application to ascertain community views on the proposal. Statutory exhibition was also undertaken in relation to the modification. Frasers as applicant have the right to seek modification of the Concept Plan under the <i>Environmental Planning and Assessment Act 1979</i> .
Property management and maintenance	2	Frasers are committed to the ongoing management and maintenance of Ed. Square. Since this Concept Plan Modification does not relate to the construction of any built form, management and maintenance issues are not required to be assessed in detail. The management and maintenance of any new buildings and uses will be subject to separate development applications, approvals and ongoing management processes.
Proposal not considered 'substantially the same' and of 'minimal environmental impact'	1	<p>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:</p> <ul style="list-style-type: none"> • 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.

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Relocation of the approved residential apartments out of the Town Centre Core to the Residential Precinct not appropriate	1	The underlining concept for the Frasers Town Centre is the need for housing people close to railway infrastructure. With the introduction of the school into the town centre core, the displaced apartments needed to be relocated. The location in Residential Precinct 3 Stage 9 is suitable to accommodate these apartments since it is adjacent to the town centre core, is the closest point to the station and transport interchange, and is located near the open space within the Town Park. Therefore, the location of the proposed residential apartments is considered appropriate given the context of the modification.
Excessive bulk and scale to high school tower form	1	The final tower form of the school building will be subject to a separate development application. That shown in the Illustrative Reference Scheme accompanying this modification is an indicative outcome only. The school has requirements for capacity, outdoor and indoor play area, and other learning requirements dictated by NSW Department of Education policy. This all drives the ultimate size, scale and form of the school, in addition to the environmental constraints within the site itself (such as overshadowing). Refer to the Design Response at Appendix E for further discussion relating to the bulk and scale of the school form.
Visual privacy impacts to existing residents	1	Visual privacy will be assessed in detail for each future development application. Visual privacy in urban environments can be managed through a range of detailed design considerations, including building separation, privacy screens, high level windows and frosting etc. The Indicative Reference Scheme has been designed to enable appropriate separation distances between apartments, in accordance with the requirements of the NSW Apartment Design Guidelines. For residents choosing to live in the town centre, it is expected that there will be a mix of uses in this more urban part of the precinct – this contributes to the vibrancy of Ed. Square. A range of housing typologies is provided throughout the precinct to provide appropriate housing choice to residents.
Traffic and access to proposed high school including school pick up and drop off inappropriate	1	Refer to Appendix H which provides a response to the consideration of queuing and pick up/drop off activities associated with the school. The detailed design and traffic movements associated with the school pick up and drop off will be assessed with the future development application that seeks approval for the design and construction of the school.
Proximity to western APZ inappropriate	1	Refer to Section 4.5 of the RtS Report and Appendix I . A 43m APZ is proposed from the edge of the Regional Park, which has been deemed as a suitable performance solution by the bushfire consultant.
Construction Management relating to access, traffic and limiting impacts to surrounding areas not considered	1	No approval for construction is sought under the Concept Plan and MOD 12. Construction management will be subject to separate DAs which seek to undertake construction activities.
Waste Management not considered	1	Waste management has been considered at a high level in the design of the Indicative Reference Scheme. Waste management will be subject to a detailed assessment for each separate development application.
Security concerns not appropriately addressed	1	The indicative reference scheme demonstrates access and security/separation of user groups can be achieved. The final security and access proposal will be addressed in more detail at the future development application stage, and will be of particular importance to the school.