

Emma Butcher  
Department of Planning, Industry and Environment  
Regional Assessments  
Planning and Assessment  
Locked Bag 5022  
**PARRAMATTA NSW 2124**

By email: [Emma.Butcher@planning.nsw.gov.au](mailto:Emma.Butcher@planning.nsw.gov.au)

Dear Ms Butcher,

**Re: Response to Submission - Edmondson Park Concept Plan Modification 12 (MP10\_0118 MOD 12)**

I refer to the request to provide comments on the Response to Submission (RtS) document prepared in relation to the modification request to Edmondson Park South Concept Plan (MP10\_0118 MOD 12).

The proposed modification (MOD 12) seeks the following -

- Amend the Ed. Square Design Guidelines (Design Guidelines);
- Introduce the Public Domain Plan for Town Centre West and Residential Precinct 3 to guide the future design of public domain;
- Introduce maximum Gross Floor Area (GFA) and building heights to the new High Density Residential Precinct;
- Amend the existing maximum height and GFA for the Town Centre Core Quadrants to accommodate the future high school; and
- Corresponding amendments to the conditions of approval as required to accommodate the above changes.

Council notes the Response to Submission (RtS) document and associated updated technical studies prepared in response to Council's submission dated 11 February 2022. However, in the time since Council prepared its response in February, new information has also become available which should also be considered by the Department in making its assessment. Noting the above, Council staff provide further comments and recommendations relating to strategic context, open space and recreation, urban design and public domain as well as traffic and transport planning considerations. These detailed comments are provided in the attachments to this letter and are to be considered in the assessment of the proposed modification.



Should you require any further information on this matter, please do not hesitate to contact Masud Hasan Senior Strategic Planner, on 8711 7383.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lina Kakish', written in a cursive style.

**Lina Kakish**  
Manager Strategic Planning

## **Attachment – Detailed comments**

### **Strategic Context**

MOD12 currently lacks in providing certainty as to the location of the future school, which could impact development yield in the locality and contribute strongly to an insufficient provision of open space and community facilities within the locality. Confirmation on the proposed high school's location and its design are critical in understanding the impacts of MOD12 and any additional infrastructure needs in the Town Centre.

It is understood that an alternative location for the high school at Town Centre North (Landcom Town Centre) has also been explored by SINSW. If the school is not located within the Frasers Town Centre, then the proposed multi-level high school site would be returned for private development; the additional uplift in the east of the precinct will result in a net uplift of development in the centre in this scenario. Council has received a draft report from its consultant in relation to the provision of open space and community facilities in the town centre, given the number of MODs that have been approved or are under assessment. Early findings of this report would indicate that additional land and facilities are required. Restricting the use of the proposed town centre high school site for educational purposes only could satisfy the concerns surrounding additional development yield associated with MOD 12.

Council is currently negotiating a Voluntary Planning Agreement (VPA) with the applicant regarding the delivery of public infrastructure in Frasers Town Centre as a condition to the Modification 4 (MOD4) of the Concept Plan approval. Proposed MOD12 has included amended plans for the local road network and social infrastructure provision (such as, Town Centre Plaza West). An operation and maintenance regime for the proposed Town Centre Plaza West is not clear. The infrastructure provisions need to be confirmed in the planning agreement as the proposed facility will potentially be utilised by future high school students and residents of broader Edmondson Park. Changes to the planned public infrastructure as well as its delivery and maintenance schedules need to be included in the draft VPA.

### **Recommendation**

1. Confirmation from SINSW is requested regarding the school location in North-West Quadrant of the Town Centre before approving MOD12 to the Concept Plan.
2. The intended high school floor space within North-West Quadrant lot of the Town Centre is conditioned to be used for a public high school only.
3. The draft VPA for Frasers Town Centre should contain the amended infrastructure plan under MOD12, including the delivery, operation and maintenance schedule for the planned social infrastructure provisions under the modification proposal.

### **Open Space and Recreation**

Currently there is no active playing fields proposed within walking distance of the Edmondson Park Town Centre. It should be noted that the adjoining NSPWS Regional Park site is not suitable for active recreation, uses, and the Bushfire Asset Protection Zone impacts the proposed school site.

### **Recommendation**

4. An updated Active Recreation and Playing Field Needs Assessment is included to ensure that recreation courts and access to sports fields are provided within the school premises or, within a suitable distance from the proposed high school location. It must be demonstrated that open space / sporting facilities can be reasonably catered for, without relying on Council facilities.

### **Urban Design and Public Domain**

The overall response for retaining the proposed building height for Residential Precinct 3 Stage 9 is noted, however, the concern in terms of visual symmetry and balance between the two tower forms (i.e., on either side of Soldiers Parade) remains valid.

The response for achieving 50% canopy cover target for public domain areas (i.e., as per the previously drafted Design and Place SEPP ) is noted, however, the proposed development being an exemplar in the area, should set precedents for similar urban developments in the area. Higher canopy cover will also be useful to reduce the urban heat island effect that Western Sydney region is currently impacted with.

The constraints highlighted in the response document for providing a clear pedestrian priority connection to Edmondson Regional Park (i.e. opposite to Town Centre Plaza West across MacDonald Road) is noted. However, free movement of pedestrian into the regional park across Macdonald Road is required for establishing the connection to the regional park and its overall activation.

### **Recommendation**

5. The maximum permissible height for Residential Precinct 3 Stage 9 should be reduced and be equal to the height of the tower (i.e., RL 97.15) on the opposite side of Soldiers Parade. This is to ensure visual symmetry and balance between the two tower forms.
6. An increased canopy cover target (50%) for all public domain areas is demonstrated to set a standard for similar urban development in the area and to assist in reducing urban heat island effect.
7. Establish a safe pedestrian connection between Town Centre Plaza West and Edmondson Regional Park across Macdonald Road. This is to encourage seamless pedestrian access to the regional park and its activation.

### **Traffic and Transport**

The following traffic and transport comments are provided for consideration.

## Traffic Modelling

- The intersection modelling analysis is based on AIMSUN model outputs. It is not a common modelling tool for detailed intersection analysis. In NSW, SIDRA is TfNSW recommended intersection performance analysis modelling tool to assess intersection capacity and queueing issue along road network. There is no confirmation from TfNSW whether the AIMSUN modelling outputs are correct.
- The traffic modelling analysis is based on the assumption that MacDonald Road between Station Street North and Bernera Road will be completed by 2023. Council has not received any design plan from Landcom for constructing this section of MacDonald Road. It is likely that this road section may not be completed by Landcom within the projected time period. Without the road link, the proposed school and other retail development in the precinct will have significant traffic impact on existing road intersections in the vicinity of the subject site, including:
  - Henderson Road/MacDonald Road intersection;
  - Henderson Road/Soldiers Parade intersection; and
  - MacDonald Road/General Blvd intersection.

The TIA report needs to include traffic impact assessment for the interim scenario without the section of MacDonald Road between Station Street North and Bernera Road.

- U-turn movements are not modelled at the intersection of MacDonald Road/Henderson Road. Significant amount of traffic along MacDonald Road from south will undertake U turns at the roundabout intersection to access the newly upgraded commuter car park, the proposed access to the school and retail precinct. The movements are likely to create long queue along Henderson Road, which are not included in the models.
- The road intersection of MacDonald Road/General Blvd is modelled as a signalised intersection. This is currently operating as a Giveway controlled intersection. MOD12 will attract more vehicular movements to access this intersection and no timeline is provided for installing the traffic signal. There is no evidence provided that indicates the signalised intersection of MacDonald Road/General Blvd will be completed prior to commencement of the subject Town Centre precinct operation.

## Recommendation

8. SIDRA modelling analysis is carried out for the following key intersections:
  - Henderson Road/MacDonald Road intersection;
  - Henderson Road/Soldiers Parade intersection; and
  - MacDonald Road/General Blvd intersection.
9. An interim modelling (Item 2.3) is provided depicting the traffic scenario in absence of Macdonald Road between Station Street North and Bernera Road. This is to investigate the interim traffic impact in the absence of the referred Macdonald Road section.
10. U-turn movement is modelled at MacDonald Road/Henderson Road intersection to investigate the potential queueing issue at this intersection.

11. The intersection of Macdonald Road/ General Boulevard is signalised prior to the commencement of the subject Town Centre precinct operation.

### **Car Parking and Access Arrangement**

- MOD 12 proposed to change the previously planned signalised access to the basement car park to a left in/left out access only. The removal of traffic signal to the basement car park access will reduce accessibility to the school and the retail uses. It will result in significant amount of traffic to circulate within the town centre along General Boulevard, Sergeant Street, Henderson Road and Henderson Lane. This will further generate conflicts between pedestrian and vehicular movement creating an unsafe environment for pedestrian and cyclists, particularly for future school students.
- Previous Town Centre development applications indicated that the basement car parks for various buildings within the Town Centre Core precinct would be connected to Stage 1 development of Frasers Town Centre. Detail of the proposed connection has not been provided.

### **Recommendation**

12. The proposed signalised access to the basement carpark on MacDonald Road is maintained to ensure a safe pedestrian and cyclist environment.
13. Clarification is provided regarding design of the basement carpark in order to facilitate its overall connection to future school and retail uses.

### **Pick-up and Drop-off Area**

The proposed drop-off area along Henderson Lane is not supported, which would induce significant vehicular movements along Sergeant Street, Henderson Road and Henderson Lane. Considering these streets are proposed to be high pedestrian and cyclist activity area, the closure of Henderson Lane to vehicular access at Sergeant Street end is recommended. Provision of additional pick-up/drop-off capacity and carparking space for school staff at the basement carpark is supported.

### **Recommendation**

14. Henderson Lane is closed to vehicular access at Sergeant Street end in order to facilitate convenient pedestrian and cyclist movement. Additional pick-up/drop-off capacity and carparking space for school staff at the basement carpark are provided.

### **Infrastructure Staging**

Without the completion of MacDonald Road between Station Street North and Bernera Road, several road intersections within the Town Centre are likely to operate at unacceptable and unsafe condition, such as Henderson Road/MacDonald Road intersection and MacDonald Road/General Boulevard intersection. Interim and ultimate

intersection upgrades prior to the commencement of the subject Town Centre precinct operation will be required. The following works need to be prioritised for delivery:

- Traffic signals at the intersection of MacDonald Road/General Boulevard;
- Henderson Road/MacDonald Road intersection upgrade;
- Pedestrian crossing facility on MacDonald Road and potential traffic signals at the intersection of MacDonald Road/the access road to the basement car park.

### **Recommendation**

15. Delivery of interim and ultimate intersection upgrades prior to the commencement of the subject Town Centre precinct operation is conditioned to ensure safe and acceptable level of traffic movement. The required priority works include:

- Signalised intersection of MacDonald Road/General Boulevard;
- Upgrading of Henderson Road/MacDonald Road intersection;
- Pedestrian crossing facility on MacDonald Road and potential traffic signal at the intersection of MacDonald Road/the access road to the basement car park.