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By email: [emma.butcher@planning.nsw.gov.au](mailto:emma.butcher@planning.nsw.gov.au)

Dear Ms Butcher,

**Re: Edmondson Park Concept Plan Modification 12 (MP10\_0118 MOD 12)**

Liverpool City Council was invited to provide comments to the notification of a modification request to Edmondson Park South Concept Plan (MP10\_0118 MOD 12).

The proposed modification (MOD 12) seeks the following -

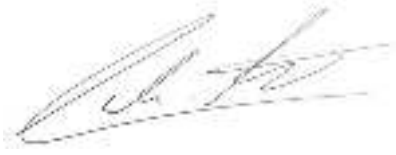
- Amend the Ed. Square Design Guidelines (Design Guidelines);
- Introduce the Public Domain Plan for Town Centre West and Residential Precinct 3 to guide the future design of public domain;
- Introduce maximum Gross Floor Area (GFA) and building heights to the new High Density Residential Precinct;
- 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 Environmental Assessment Report including the associated technical assessment reports prepared in support of the proposal. Noting the above, Council staff provides several recommendations relating to open space and recreation, urban design and public domain as well as traffic and transport planning aspects of the proposed modification. These detailed comments are provided in the attachment to this letter and are to be considered in the assessment of the proposed modification request.

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 'L. Oste', written over a faint horizontal line.

**Luke Oste**  
Coordinator Strategic Planning

## **Attachment – Detailed comments**

### **Open Space and Recreation**

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.

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.

### **Recommendations**

1. Consider amending building heights along the northern edge of the Town Park to reduce overshadowing on the Town Park in winter.
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.

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

#### **Design Guidelines**

The following comments are provided in relation to the submitted Design Guidelines:

- It is noted that the applicant has included the changes proposed (but not approved) as part of MOD11 within the current modification application (MOD12).
- A clear indication of all the changes being proposed in the Design Guidelines and the Public Domain Plan has not been provided.
- The design characteristics tables (Table 3 - 7) in the Design Guidelines is not readable and requires separate headings.
- The Design Guidelines lacks in providing design outcome and performance criteria for all development types within High Density Residential Precinct and Educational Uses.

## Public Domain Plan

The following comments are provided in relation to the submitted Public Domain Plan:

- 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.
- A much stronger physical / visual connection across Macdonald Road and Town Plaza West is required and therefore requested.
- 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.
- 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.
- 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.

## Illustrative Design Report

The following comments are provided in relation to the submitted Illustrative Design Report:

- 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.
- 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.

## Recommendation

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.
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 '***bold italics***' and all the deletions as '~~**bold strikethrough**~~' in the documents.
5. Categorise design characteristic tables (Table 3 - 7) under a separate heading in the Design Guidelines for improved readability.

6. The development types for which design characteristics are not included in the Design Guidelines, should demonstrate compliance with relevant SEPP controls.
7. A clear pedestrian priority connection be provided from Town Centre West through to Edmondson Regional Park to enable easy and safe pedestrian access.
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 much stronger physical / visual connection across Macdonald Road and Town Plaza West.
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.
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.
11. Appropriate interface treatments between the nature reserve and town centre, streets and built form are included as part of the design documentation.
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).
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.

### **Traffic and Transport**

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.

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.

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.

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.

## Recommendation

14. A revised Traffic Impact Assessment be submitted to Council for review, which is to address the following -
  - Traffic impacts of the proposed high school during the PM peak hour;
  - Trip generation and distribution assumptions from the recently constructed commuter car park.
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.
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.
17. Both on-street and on-site parking provisions for staff and students of the proposed high school be included.
18. Forecast traffic flow diagrams along key roads within the study area be included in the Traffic Impact Assessment report.
19. SIDRA modelling analysis be carried out for the following key intersections (but not limited to):
  - 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
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.
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.
22. Traffic volume forecast be used to justify the proposed traffic signal locations within the town centre and warrant assessments for additional traffic signals.
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.
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.