



Department of Planning and Environment

Ms Emma Butcher

Our ref: DOC22/34911

Industry Key Sites
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Your ref: MP10_0118 MOD 12

31 January 2022

Dear Ms Butcher

Subject: EES comments on Environmental Assessment for the Major Project Modification for Edmondson Park South Concept Plan – MP10_0118 MOD 12– Ed Square, North-West Quadrant, Edmondson Park

Thank you for our email of 18 January 2022 requesting advice on the Environmental Assessment (EA) for this Major Project modification MP10_0118 MOD 12.

The Environment, Energy and Science Group (EES) has reviewed the EA for the MOD 12 proposal and provides its recommendations and comments at Attachment A.

If you have any queries regarding this matter, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer on 02 8837 6017 or at janne.grose@environment.nsw.gov.au

Yours sincerely,

A handwritten signature in black ink that reads 'S. Harrison'.

Susan Harrison
Senior Team Leader
Greater Sydney Branch, Biodiversity and Conservation
Environment, Energy and Science

Attachment A

Subject: EES comments on Environmental Assessment for the Major Project Modification for Edmondson Park South Concept Plan – MP10_0118 MOD 12– Ed Square, North-West Quadrant, Edmondson Park

The Environment, Energy and Science Group (EES) has reviewed the following reports for this Major Project modification:

- Environmental Assessment (EA) - 2 December 2021
- Appendix A – Ed. Square Design Guidelines – Rev - December 2021
- Appendix B – Ed. Square Public Domain Plan – MOD 12 – 24 November 2021
- Appendix C – Ed. Square Urban Design Report– MOD 12 – 24 November 2021
- Appendix D – Illustrative Design Scheme Report – 22 November 2021
- Appendix E – Edmondson Park South Concept Plan maps
- Appendix F1 – Height map
- Appendix F2 – GFA map
- Appendix H – Watercycle Management Plan (WCMP) – 30 November 2021
- Appendix J – Asset Protection Zone Assessment (APZ) – 24 November 2021
- Cabramatta Creek Flood Study and Basin Strategy Review (report prepared by Bewsher Consulting for Liverpool City Council, September 2011)

and provides the following comments.

The Modification Application seeks to facilitate the future development of a new Department of Education vertical high school in the North-West Quadrant of the Town Centre which will necessitate relocation of proposed residential apartments out of the Town Centre to the Residential Precinct 3 Stage 9 (now known as the ‘High Density Residential Precinct’).

Edmondson Park Regional Park

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).

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:

- 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>
- 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.

Asset Protection Zone

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 defined as a Special Fire Protection Purpose Development (SFPP). Appendix J notes:

- 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 on Figure 1.

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:

- 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...”.

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.

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:

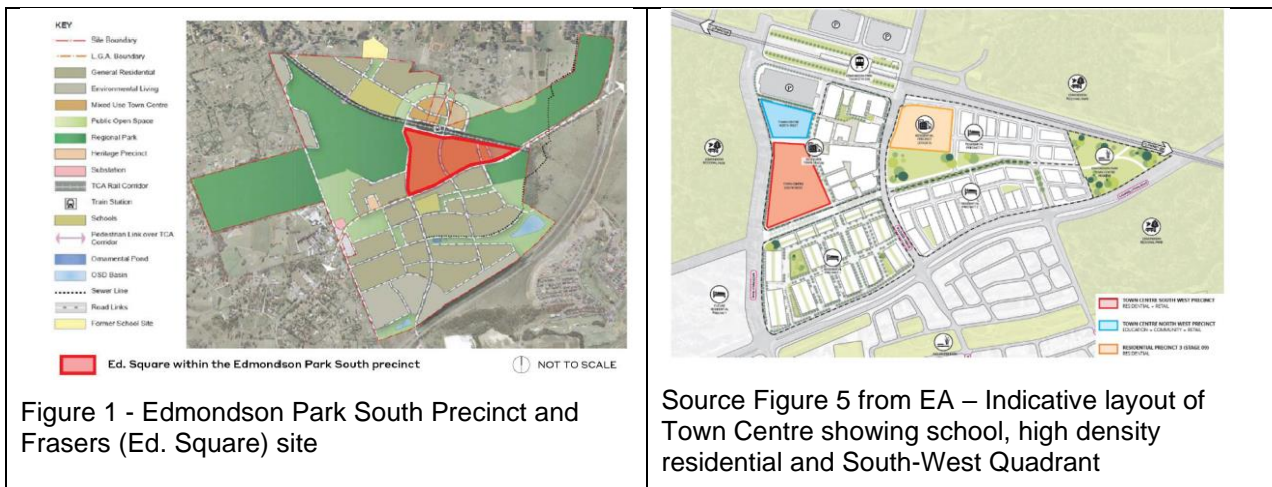
- 1.10 Future subdivision applications are to demonstrate that the APZs are located outside any area of public open space, unless agreed to by the relevant council, and outside the regional park, unless agreed to by Office of Environment and Heritage.

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.

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.

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).

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.



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.

Water Cycle Management

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 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.

EES previously raised concern that:

- 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).
- 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.

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.

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

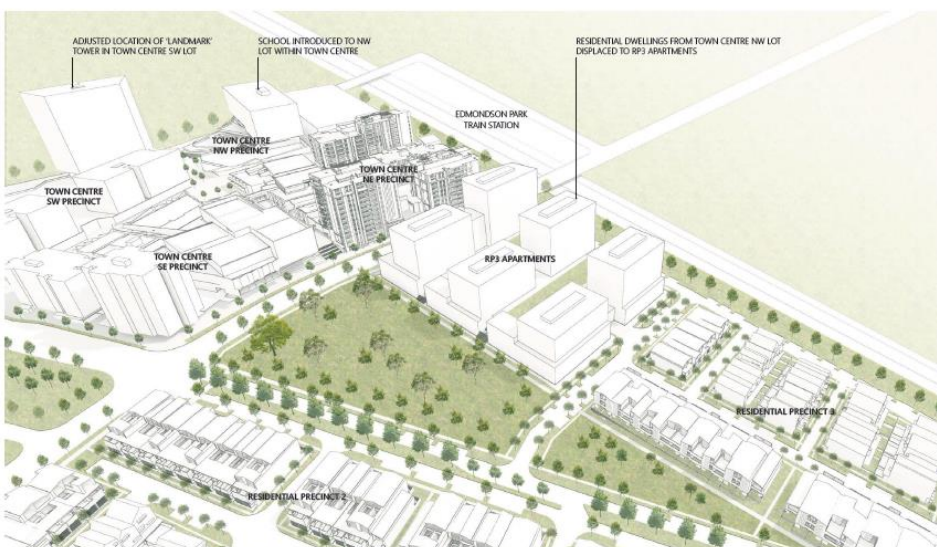
The RtS for MOD 12 needs to clarify if it is proposed to locate the drainage solution within the Regional Park. EES does not support the locating WQ14 link in the Regional Park, As noted above, the proposed modification should not give rise to any environmental impacts on the Regional Park.

Landscaping at the site

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 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). EES recommends:

- 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”
- 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).

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.



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.

Flooding

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.

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.

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.

End of Submission