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

Attention: Emily Dickson

RE: RESPONSE TO SUBMISSIONS – MODIFICATION 5 TO EDMONDSON PARK CONCEPT PLAN (MP 10_0118) AND SEPP AMENDMENT

PROPERTY AT: GALLIPOLI DRIVE, BEZENTIN RIDGE ROAD, SOLDIERS PARADE AND CAMPBELLTOWN ROAD (LOT 1 DP1257105, LOT 2 DP1257105, LOT 3 DP1257105, LOT 4600 DP1248502, LOT 8 DP1200987, LOT 215 DP1186108, LOT 9 DP1220978, PART OF LOT 21 DP1238608 AND PART OF LOT 20 DP1238608)

Dear Emily,

Reference is made to the subject Modification 5 (Mod 5) to the approved concept plan for Edmondson Park South (**MP 10_0118**). In particular, MOD 5 seeks to amend the approved Concept Plan and *State Environmental Planning Policy (State Significant Precincts) 2005* (Precincts SEPP). The proposed amendments have been included below.

The following amendments are sought to the Concept Plan:

- Introduce a maximum Gross Floor Area (GFA) control in the Station Precinct under the Concept Plan, allocating 140,389m² GFA (equivalent to the current FSR control) by quadrant across the Station Precinct;
- Increase minimum anticipated residential yields within the Town Centre North under the Concept Plan from 440 to 3,030-3,286;
- Amend height restrictions to between 12m and 50m in nominated locations (and up to 67m for one landmark building);
- Alter the residential mix to primarily comprise Residential Flat Buildings, Walk-Up Apartment Buildings, Mixed-use Apartment Buildings, Integrated Residential Flat Building and Strata Terrace Typology, Terrace Houses, Manor Homes, Semi-Detached Dwellings and Studio Dwellings;
- Add the definition of Studio Dwellings into Precincts SEPP, allowing these Secondary Dwellings to be subdivided on to separate titles;
- Revise the land use configuration to reduce the area allocated to school land from 8ha to a minimum 2ha and maximum 6ha;
- Specify areas where Studio Dwellings are permitted in the R1 General Residential Zone;
- Allow general residential on the 2ha area of land formerly identified as school land and introduce additional general residential/school apportionment on a 4ha area of the land formerly identified as school land to allow flexibility if no longer required;
- Revise the Road Network and Hierarchy Concept Plan as per the TMAP and Addendum TMAP Report.
- Adjust the Edmondson Park South Bushfire Asset Protect Zone Concept Plan (APZ) corresponding with the reduction on the School Site adjacent to Maxwells Creek;

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- Include a portion of Office of Strategic Lands (OSL) land into the boundary of Edmondson Park South boundary, a portion of this land is already included in the Precincts SEPP. This is a procedural mapping correction to align the Concept Plan boundary with the Precincts SEPP in this location.
- Revise the Statement of Commitments and Conditions as relevant to the amended scheme;
- Create an exemption to the requirement for a Development Control Plan to be prepared and introduce Design Guidelines to guide the built-form of the development of the Town Centre North.

The following amendments are sought to the Precincts SEPP:

- Amend the Floor Space Ratio Map to remove the FSR control applying to the Station Precinct, which is to be replaced with the equivalent GFA control allocated by quadrant;
- Amend the Height of Buildings Map as follows:
 - Within the Station Precinct, allow heights up to 50m, including heights up to 67m for one landmark building;
 - Within the Maxwells Creek Precinct, allow heights up to 28m;
 - Within the Parkland Precinct, allow heights up to 12m in Area 1 and up to 21m in a specified location; and
 - On the School Site, allow heights up to 21m.
- Amend the Land Zoning Map to specify areas in the R1 General Residential Zone where Studio Dwellings are permitted with consent, and areas where Residential Flat Buildings are prohibited;
- Insert the definition of Studio Dwellings into Clause 2 of Appendix 16 to Precincts SEPP, allowing these Secondary Dwellings to be subdivided on to separate titles as follows:

studio dwelling means a dwelling that:

(a) is established in conjunction with another dwelling (the ***principal dwelling***), and

(b) is on its own lot of land, and

(c) is erected above a garage that is on the same lot of land as the principal dwelling, whether the garage is attached to, or is separate from, the principal dwelling, but does not include a semi-detached dwelling.

Note.

*Studio dwellings are a type of **residential accommodation***

- Insert additional wording to both Clauses 27 and 28 of Appendix 16 of Precincts SEPP to prevent a variation to the 12m height control standard in specified parts of the Parkland Precinct of the Town Centre North to ensure housing diversity is achieved and Residential Flat Buildings are not built in those locations;
- Insert additional wording to Clause 36 of Appendix 16 of Precincts SEPP to create an exemption to the requirement for a Development Control Plan to be prepared where suitable Design Guidelines are prepared; and
- Insert additional Clause 39 to Appendix 16 of Precincts SEPP to specify additional permitted uses for particular land including where studio dwellings are permitted and where residential flat buildings are prohibited to ensure housing diversity is achieved.

The Environmental Assessment (EA) and accompanying documents were placed on exhibition for a period of 28 days inclusive between 7 November 2018 and 4 December 2018. Submissions were received from the Department of Planning, Industry and Environment (DPIE) the Government Architect NSW (GANSW), and other relevant State Agencies and Liverpool City Council (LCC). A Response to Submissions (RTS) was lodged with DPIE on 21 August 2020 and was exhibited by the DPIE on 10 September 2020 to 23 September 2020.

The DPIE issued an email on 14 October 2020, requesting a RTS to the submissions received from LCC, GANSW, DPIE, Endeavour Energy and Transport for NSW (TfNSW). In addition, a total of 58 public submissions were received in response to the public exhibition of the RTS.

Following a review of the submissions, the key matters raised have been taken into consideration and are appropriately addressed in the response matrix that is attached to this letter (see **Table 1**).

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It is also important to note that Landcom have met with Liverpool Council's staff and discussed each of the matters raised in depth. Council acknowledges that many of its comments generally would be more appropriate to be resolved at a development application stage, however they seek greater certainty that the matters raised will be dealt with in a holistic manner as they are concerned that future development applications for the town center north will be made in piecemeal fashion.

Landcom will deliver the infrastructure required to service the Town Centre North development which will encompass the Station Precinct, Maxwell's Creek Precinct and the Parkland Precinct, excluding the School Site. Landcom has committed to taking a coordinated approach to delivering infrastructure and will engage with Liverpool Council in the preparation of future development applications. Council officers were supportive of this approach.

It is considered that this information now provides the DPIE with all the necessary facts and relevant particulars related to the proposed modifications to the Concept Plan (**MP 10_0118**) and Precincts SEPP thereby, enabling the assessment to be finalised and the Proposal determined.

We look forward to the DPIE's feedback on the information provided and look forward to progressing with the assessment of this Modification Application.

Should you wish to discuss further, please contact the undersigned.

Yours Faithfully,



Thomas Cook
Director
Willowtree Planning Pty Ltd
ACN 146 035 707

Enclosed:

- **Appendix 1 – Response to Public Submissions**
- **Appendix 2 – Height of Building Map**
- **Appendix 3 – Traffic Model**
- **Appendix 4 – Water Cycle Management Response**
- **Appendix 5 – Revised Public Domain and Landscape Plan**

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Table 1. Response Matrix

Liverpool City Council

Open Space and Active Recreation

Edmondson Park Town Centre North is characterised as a high-density development. This is justified by the Occupancy Rate Methodology on page 24 of the Social Impact Assessment (SIA) report submitted by the applicant.

High density development should have access to a local-neighbourhood level park within a 200m radius, a district level park within a 1.2km radius (10-15 min walkability or a driving time of 4-6 min) and a regional park (active and passive) is required to be within a 2 km radius (25 minutes' walk) of dwellings.

The SIA report did not consider the quantity benchmarking as identified in Council's Recreation, Open Space and Sport Strategy (ROSS). It makes references to the NSW Government Architect's (GA) Draft Open Space Guidelines. The Government Architects 'Draft Greener Places Design Guide' is a draft document which does not give enough evidence to move away from required quantum of open space in Council's opinion.

To assist in the determination of the required open space for the proposed high-density development, the table below provides some benchmarks for the provision of open space.

Table 1: Summary of the Public Open Space Provision

Source	Measure	Application to Edmondson Park Town Centre North (7,065 residents)
World Health Organisation (WHO)	9 sqm public open space per resident	6.35 ha of public open space
New York City	10 sqm public open space per resident	7.07ha of public open space
City of Charles Sturt (SA)	25-50% of total land area as public open space	40-50% of total land area for public open space (based on best industry practices)

It should also be noted that Clermont Park in Edmondson Park Town Centre North does not provide for a diversity in recreation spaces. Clermont Park can only accommodate two families at the children's playground at a time. The qualitative characteristics for Clermont Park is very low. The projected population of 7,065 also triggers a provision of 2 sporting fields (1Ha of sporting fields and courts per 1000 population - Government Architect's Draft Greener Places Guidelines).

Council staff recommends that in absence of a guideline to determine the quantum of open space provision in greenfield developments and in reference to Table 1 above, that a provision of 10 sqm/person for the development i.e. 7.07ha, instead of the proposed 5.9ha of open space within the Town Centre North.

Applicants Response

As detailed in Section 2.3.5 of the Response to Submissions prepared by Willowtree Planning dated August 2020, the quantity of benchmarking as identified in Section 9.3 of the Liverpool Council *Recreation, Open Space and Sports Strategy 2018* refers to the commonly used benchmark for open space applied across NSW, being 2.83ha per 1,000 persons. However, as previously mentioned it is considered that there is a general movement away from the use of this benchmark as it was developed for greenfield areas, rather than more densely populated areas which Edmondson Park is anticipated to become.

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The Edmondson Park Town Centre North includes a total of **5.9ha of public open space** which includes **4.3ha of public open space for conservation, 1.5ha of local open space and 0.1ha of green through site links**. In addition to the public open space, 3.7ha of private/strata open space is proposed and 2.9ha of low density private open space.

In addition, the broader Edmondson Park Concept Plan also provides a significant surplus of open space that will be available for future residents, including 150ha of regional open space and a 50ha network of smaller community parks, playgrounds, playing fields and reserves.

Importantly, Landcom will ensure a walkable neighbourhood is delivered with a focus on pedestrian and cycle paths which provide a high level of connectivity to the public open space networks (see **Figure 1**). Landcom are also committed to delivering high quality open space and examples of this are included below and are in addition to around 6.7ha of sport playing fields to be delivered by Landcom in Precinct 3, which is in the early design stages and negotiation with Council:

- *Bardia Park – 0.5ha local park*
- *Brigade Park – 1.2ha local park*
- *Clermont Park – 1ha local park*
- *Memorial Forest Reserve – 1ha Dog park plus 2ha open space*
- *Mont. St. Quentin Oval – 5.4ha Sport Facility and inclusive play ground*

Furthermore, as detailed in the Social Infrastructure Assessment provided at **Appendix 7** of the previous RTS, there is no additional open space required to be provided in the Town Centre North.

Accordingly, in consideration of the above, the current proposed provision of open space in the Town Centre North is considered to be acceptable to accommodate the future population.



Figure 1: Pedestrian Connectivity (Roberts Day, 2020)

Affordable Housing

According to the Community Housing Industry Association NSW, the net demand for social and affordable housing (SAH) in the Liverpool LGA will increase up to 115% by 2036. This is quite significant, especially for newly emerging areas.

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The proponent's commitment to provide a standard 5-10% affordable housing for their developments is acknowledged and appreciated.

The proponent's commitment to provide 5-10% is consistent with Council's submission. The selected affordable housing units should be equally distributed throughout the development.

Applicants Response

The EA and the Contributions Plan previously submitted in response to the SEARs specify how Landcom is committed to providing a target of 5-10% affordable housing within the Edmondson Park Town Centre North.

The proposed modification to the Concept Plan will provide a range of housing types and sizes at a range of price points to cater for different households and income levels within the community. This is achieved by increasing building heights closer to the station and limiting building heights in parts of the Parkland Precinct to prohibit Residential Flat Buildings in these areas.

Landcom seek to co-locate affordable housing to multi-unit dwellings which provide more affordable homes for low to moderate income households. The proposed provision of affordable housing is consistent with the provisions prescribed under Schedule 2 of *State Environmental Planning Policy No 70 – Affordable Housing (Revised Schemes)* and Landcom's own policy Housing Affordability and Diversity Policy.

In consideration of the above, the proposed co-location of affordable housing is consistent with the relevant provisions prescribed for affordable housing and is acceptable in this instance.

The Location of where and how Landcom will deliver affordable housing in this development will be refined and confirmed through a development application process. Council Officers were supportive of this approach.

Health Care Facility

The proposal has not indicated the provision of health care services within the development. The Social Impact Assessment report submitted by the applicant has conducted a benchmarking assessment and concluded with the recommendation that no facilities are required.

Council staff recommends, considering the size of the proposed development, that the proponent considers the provision of a health care facility in the local area.

Applicant Response

A revised Social Infrastructure Assessment was provided at **Appendix 7** of the previous RTS. In relation to health care, the findings of the assessment are outlined below.

A benchmarking assessment was carried out to understand the demand for social infrastructure based on the future population of the proposed Modification 5 of the Edmondson Park South Concept Plan. The assessment of the proposed development of 3,286 dwellings accommodating 7,065 people, was based on an average occupancy rate of 2.15 people per dwelling.

The benchmark for a community health centre was based on 1:20,000 people. Based on a proposed population of 7,065 people in Edmondson Park South the proposal would generate a requirement of 0.35 centres. Accordingly, the results of the benchmarking assessment found that no community health centres are required.

Notwithstanding, it is noted that the Station Precinct in Edmondson Park Town Centre North is zoned B4 Mixed Use pursuant to *State Environmental Planning Policy (Major Projects) 2005* (Precincts SEPP). The B4 zone permits health services facilities, therefore in the instance that demand arises in the future for a health services facility the land is appropriately zoned to allow for this facility in the future.

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This is in addition to medical and health facility tenants secured in the Frasers Town Centre on the southern side of the Train Station.

Childcare and After School Facility

Based on the benchmarking assessment under the SIA, the incoming population in the Town Centre North will generate a demand for an additional 103 childcare places and 40 afterschool places.

Council staff recommends that the provision of one combined long day care and after school facility be included in the local area.

Applicants Response

Centre-based childcare facilities are permitted with consent in the B4 zone within the Station Precinct. Therefore, the land is appropriately zoned for the provision of a centre based childcare centre facility in the future.

Notwithstanding, discussions held between Landcom and Liverpool Council noted that a community facility which includes a childcare centre is in the process of being delivered in Edmondson Park Town Centre South by Frasers. In light of this, Landcom will consider making a monetary contribution towards the development of a childcare centre in Edmondson Park Town Centre South as part of a Voluntary Planning Agreement (VPA) with Liverpool Council.

Landcom has commenced discussions with Liverpool Council about a VPA and will continue to work with Council in the preparation and negotiations of the VPA to support Landcom's Town Centre North development.

Community Facility

There are currently no community facilities within 2km of the site. A district level community facility is planned within Frasers Town Centre.

Council staff recommends that consultation should be undertaken with Council to determine adequacy of the planned district level facility in the town centre.

Applicants Response

Community facilities are permitted with consent in the B4 zone within the Station Precinct. Therefore, the land is appropriately zoned for the provision of a community facility in the future.

As aforementioned, a community facility is in the process of being delivered in Edmondson Park Town Centre South by Frasers. Landcom will consider making a monetary contribution towards the development of a community facility (which includes a childcare centre) in Edmondson Park Town Centre South as part of a VPA with Liverpool Council.

As above, Landcom has commenced discussions with Liverpool Council about a VPA and will continue to work with Council in the preparation and negotiation of the VPA to support Landcom's Town Centre North development.

Water Cycle Management

The Water Cycle Management Strategy Report submitted identified requirements for increased detention volume due to the expected increase in impervious areas in the Town Centre catchment. The report did not detail how the additional stormwater run-off will be managed.

The report identified the regional detention basin to be located in the upper reach of Maxwells Creek, however, it did not demonstrate that this basin would adequately attenuate the expected increase in stormwater flows.

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Council staff recommends that the Water Cycle Management strategy demonstrate that the proposed modification will meet Council's pollution reduction target and attenuate the post development flow to pre-development levels for up to the 1% AEP storm event.

Applicants Response

A response to the above comments has been prepared by J.Wyndham Prince and provided at **Appendix 4**.

Infrastructure Funding

Councils current contribution scheme for the development site assumes the development of 440 dwellings. With the proposed additional development, the applicable contributions will need to be increased to take into consideration the demand that would be generated by the proposed increased population.

Council notes that Landcom has proposed a development contributions framework for the Town Centre North. This is consistent with Council's approach with Frasers Group for the development of the Town Centre South.

Council is currently reviewing Liverpool Contributions Plan 2008 (Edmondson Park). This review could take into consideration the proposed modification and the submitted contributions framework. The alternate arrangement is for the proponent to discuss and make an offer to Council to enter into a Voluntary Planning Agreement (VPA) to fund the additional infrastructure.

Council staff recommends that payment of contributions in accordance with the existing contributions plan is acceptable up to the Concept Plan approval of 440 dwellings. Contributions payment after 440 dwellings needs to be dealt under an alternate agreement with Council.

Future contributions should be paid on a pro-rata basis for the approved number of dwellings/commercial floor space (if applicable).

Should the concept plan be approved, Council staff are open to commencing formal discussions on a planning agreement, noting informal discussions have been held.

Applicant response

Landcom has commenced discussions with Liverpool Council about a VPA and will continue to work with Council in the preparation and negotiation of the VPA to support Landcom's Town Centre North development.

Subject to consultation with Council, the VPA will identify opportunities to deliver works in kind to meet the demand generated by the proposed development, will include a component of land dedication to Council and facilitate a timely delivery of local facilities and services. Subject to negotiations and agreement with Council, the VPA may include a component of monetary contributions under the Liverpool Contributions Plan 2008 (Edmondson Park).

As per the Contributions Framework report prepared by Urbis and submitted by Landcom in August 2018 in response to the SEARs, Landcom request that the VPA is able to be finalised in parallel with future development applications of the Town Centre North, a monetary contribution may be made by the proponent of the development application, which would then be offset from the value of the executed VPA.

Urban Design

The following advice and recommendations are provided with regards to urban design and public domain matters.

Council staff recommends the proposed master plan should ensure that the built form responds positively to the street frontage along McFarlane Road and allow a seamless integration between the existing dwellings and the proposed built form.

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The south eastern part of the development (i.e. parcel of land located east of Soldiers Parade) is quite disjointed from the rest of the site and stands in isolation with two residential towers being proposed within this area. The master plan should take into consideration the development potential of the neighbouring site and elaborate on a probable future-built scenario for this site.

Applicant Response

The proposed built form along McFarlane Road will be characterised by low density residential typologies i.e. zero lot terraces and cottages located within the Parkland Precinct. The building heights within the Parkland Precinct are limited to 12m to prohibit development of residential flat buildings. As previously noted, additional provisions would be provided to both Clauses 27 and 28 of Appendix 16 to Precincts SEPP which would effectively prevent a variation to the 12m height control standard in the Town Centre North. The existing development located on the opposite side of McFarlane Road comprises similar low-density residential typologies and it is considered that the proposed development in the Parkland Precinct will provide a seamless integration between existing and proposed built form.

In relation to the south eastern part of the development (parcel of land located east of Soldiers Parade), the detailed design of the future development on this parcel of land will be dealt with as part of a future development application. Notwithstanding, it is envisaged that the configuration of the parcel of land located to the east of Soldiers Parade offers an opportunity for unique future development.

Furthermore, design excellence will be achieved through a combination of implementing design solutions included in the revised Design Guidelines and achieving design characteristics included in the Public Domain and Landscape Plan and the Urban Design Report submitted with the previous RTS.

Urban Design

The rationale of visibility for the proposed twenty storey landmark tower is substantially dependant on the future development of the existing commuter car park site (i.e. located south of the proposed landmark tower). The master plan should take into consideration the future prospect of this land (i.e. commuter car park area) and identify adequate design measures/alternative locations for the landmark tower to ensure that the intent of creating a visible marker is not undermined.

Applicant Response

The proposed landmark building is located within the Station Precinct and it is strategically located to mirror the tower element within the Frasers Town Centre, creating a Station gateway and contributing to the overall legibility of the combined Landcom Town Centre North and Frasers Town Centre.

The proposed amendment to the Height of Building Map under the Precincts SEPP excludes the commuter car park site which will retain a maximum building height of 24m, whilst the remainder of the Station Precinct will be subject to a maximum building height of 67m for the landmark building and 50m elsewhere within the precinct.

Furthermore, Part 4 of the revised Design Guidelines prescribes town centre built form guidelines which prescribes design solutions which specify that the landmark building is sited to demarcate an important or highly visible location such as a key intersection and be visible from the Station concourse. The Design Guidelines and Public Domain and Landscape Plan have also taken into account the commuter car park land and recommend design and place making measures to support a vibrant railway station precinct.

Urban Design

The proposed master plan allocates non-residential floor space (i.e. commercial and retail floor space) to Quadrants 2 & 3 only within the station precinct area, however, the master plan identifies the entire station precinct as B4-Mixed use. The master plan should not restrict the allocation of non-residential floor space to Quadrants 2 & 3 and allow for the flexibility to locate non-residential uses within Quadrant 1 & 4 as well.

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This will ensure adequate street activation within Quadrants 1 & 4, help to achieve a more vibrant public realm throughout the entire Station Precinct. This will assist in flexibility for any future businesses such as health consulting rooms, child care centres, real estate agents and the like, which are typically located on the periphery of centres.

The urban design report does not identify the proposed active frontages within the station precinct. The report should indicate the proposed active frontages within the station precinct.

Applicant Response

The Station Precinct is characterised by a variety of uses including ground floor retail, commercial and community uses with residential on upper levels.

As aforementioned, there is a cap of 5,200m² of retail GFA within the Town Centre North as the remainder of the retail GFA is dedicated to the Town Centre located to the south (Frasers). As such, the proposal has strategically located non-residential GFA to Quadrants 2 and 3 to facilitate street activation in a centralised location.

Furthermore, street activation is not just limited to the ground floor retail component. As demonstrated in the Urban Design Report and the Design Guidelines, the following key criteria has been identified to create an attractive residential ground floor and human scale environment:

- Well-functioning transition zone from private to public through front landscaping and a level private courtyard along the walkway
- An elevated ground floor apartment with an elevated terrace
- Use of visually permeable treatments for front fencing with vegetation in the front. Legible entries accessed from the street
- Use of awnings, blade walls and/or recessed ground floor facade design
- Combination of generous and reserved facade design to create eyes on street as well as privacy
- Ground level home office opportunities
- Streetscape landscaping including ground cover, shrubbery, fine grain tree plantings and large canopy trees

Furthermore, **Figure 3** of the Design Guidelines submitted with the previous RTS identifies active street frontages within the Station Precinct.

Urban Design

The master plan should encourage the achievement of at least a 15% Deep Soil Zone area with large canopy trees and dense foliage. The master plan should also recommend achieving a higher percentage of Communal Open Space area within individual developments.

Applicant Response

The proposed concept plan modification provides 7% deep soil zones which achieves compliance with the Apartment Design. Notwithstanding, further deep soil areas will be explored as part of future development applications for built form.

Urban Design

The landscape plan identifies Magnolia Grandiflora 'Exmouth' as one of the tree planting species selected for the local roads. This tree species has been under-performing within the Western Sydney Region and should not be considered within the landscape planting palette.

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The tree identified as Magnolia Grandiflora 'Exmouth' has been removed from the Public Domain and Landscape Plan provided at **Appendix 5**. Landscape design and street tree planting will form part of a future development application to be submitted to Liverpool Council.

Urban Design

It is essential that the aspect of public safety is ingrained within the fabric of the master plan. The proposed modifications to the concept plan should include the principles of Crime Prevention through Environmental Design (CPTED) that needs to be followed within the detail design stages of the development.

Applicant Response

A Crime Prevention through Environmental Design (CPTED) analysis is not considered to be necessary as part of the concept plan as it will form a consideration in the detailed design as part of future development applications which will be submitted to Liverpool Council.

Traffic and Transport

The proposed modification would generate significant additional traffic movements. At Council and TfNSW requests, additional traffic modelling has been carried out which recommended additional traffic management works. However, the scope of works, staged implementation and funding has not been provided.

Recommendation

Council staff recommends that a revised road network plan including intersection treatments is to be prepared and included in the Town Centre North concept plan modification. This should include the following intersection treatments:

- *Traffic control signals at Macdonald Road/Bernera Road intersection (Site 5) and Macdonald Road/Buchan Avenue/Bernera Road intersection (Site 6) or alternative intersection treatments as agreed by Council.*
- *Intersection upgrades associated with the school development (2 ha and 6 ha).*
- *Other intersection treatments as required by Council.*

The plan is to be submitted to Council prior to the submission of subsequent Development Applications (DA).

The applicant is to enter into a planning agreement with Council for the provision of traffic and transport infrastructure to support the future development of the Town Centre North. The planning agreement is to be executed prior to the determination of the first Development Application (DA) for the Town Centre North.

The improvement works are to include:

- *Intersection upgrades at Campbelltown Road/Bernera Road intersection and Campbelltown Road/East Town Centre Street subject to TfNSW approval as per the TMAP.*
- *Bus stop facilities and bus shelters along the proposed bus routes.*
- *Provision of on street and off-street electric vehicle charging stations.*
- *Pedestrian/cyclist facility as required by Council.*

A copy of endorsed traffic models by Transport for NSW (TfNSW) is to be submitted to Council in order to determine the required intersection treatments.

The following relevant conditions are to be included in future development consent conditions for the concept plan:

- *The subsequent DAs are to be accompanied by detailed design plans and a report for the proposed road works, including swept path analysis, signs and line marking scheme prepared in accordance with Austroads Road Design Guide, Liverpool City Council's Design Guidelines, any urban design/*

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- public domain plan and Construction Specification for Civil Works, and best engineering practice.*
- *Prior to the issue of the construction certificate for any roadwork, the Applicant must submit the design plans to the satisfaction of Council and provide a copy of the approved documents to the Certifier for information.*
- *Multi-function poles are to be installed along the road network in the Town Centre North. Prior to the commencement of street lighting installation for a relevant construction stage, evidence must be submitted to the satisfaction of the Certifier and Council that all outdoor lighting within the site has been designed to comply with Council's street lighting policy.*
- *A public lighting design brief is to be prepared in accordance with Council's and Endeavour Energy specifications for all new public street lightings and is to be submitted to Council Traffic and Transport Section for review.*
- *A Green Travel Plan is to be prepared for future developments to identify transport options to encourage sustainable transport modes. The plan is to be prepared by a suitably qualified transport consultant in consultation with Transport for NSW (TfNSW) and Council.*

The plan is to include the following (but not limited to):

- *Objectives and set future travel mode share targets, particularly for any car trips or on-site parking space reduction as specified in the transport impact assessment report.*
- *Details of the existing transport options from and to a place.*
- *Detailed travel demand management strategies, actions and implementation plans to encourage more usage of public transport and active transport modes.*
- *Measures to promote and support the implementation of the plan, including incentives, human resource requirements, roles and responsibilities for implementing the plan including Section 5.2 of the revised TMAP.*
- *Details of the methodology and monitoring review and reporting to measure the effectiveness of the objectives and mode share targets of the GTP, including the timeframe of monitoring and the requirement for travel surveys to identify travel behavior changes of users of the development.*
- *The proposed car parking rates should be subject to Council's requirements and determined at development stages.*
- *A Construction Traffic Management Plan (CTMP) detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be prepared for future developments and submitted to Council's Traffic and Transport Section for approval prior to the issue of a Construction Certificate.*
- *The CTMP is to outline the need for a Road Occupancy Permit issued by Council or Road Occupancy Permit issued by the Transport Management Centre.*
- *Works within the road reserve shall not commence until the construction traffic management plan has been endorsed.*

Applicant Response

Landcom will deliver the infrastructure required to service the Town Centre North development which will encompass the Station Precinct, Maxwell's Creek Precinct and the Parkland Precinct, excluding the School Site. Landcom has committed to taking a coordinated approach to delivering infrastructure and will engage with Liverpool Council in the preparation of future development applications. The abovementioned matters pertaining to the proposed road network upgrades will be dealt with as part of future development applications to be lodged with Council.

In addition, Landcom will enter into a VPA with Liverpool Council for the provision of traffic and transport infrastructure to support the future development of the Town Centre North. Landcom has commenced discussions with Liverpool Council about a VPA and will continue to work with Council in the preparation and negotiation of the VPA to support Landcom's Town Centre North development.

As per the Contributions Framework report prepared by Urbis and submitted by Landcom in August 2018 in response to the SEARs, Landcom request that the VPA is able to be finalised in parallel with future development applications of the Town Centre North. If the VPA is not executed at the time of determination

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of the first development application for the Town Centre North, a monetary contribution may be made by the proponent of the development application, which would then be offset from the value of the executed VPA. A condition to this effect should be included in the notice of determination of this application.

Endeavour Energy

I refer to the Department's letter of 9 September 2020 advising that Landcom has submitted its Response to Submissions (RtS) for the modification to the Edmondson Park South Concept Plan (Town Centre North and Precinct 3) (MP 10_0118 MOD 5), located at Edmondson Park South, Gallipoli Drive, Bezentin Ridge Road, Croatia Road and Campbelltown Road in the Liverpool and Campbelltown Local Government Areas. Submissions need to be made to the Department by 23 September 2020.

In regard to Endeavour Energy's submission made to the Department on 4 December 2018, Endeavour Energy has noted that in the RtS report Section 2.6 'Key Issues – Endeavour Energy' provides a detailed response to the key issues raised by in regard to the provision of electricity supply required to facilitate the proposed development and is supported by a revised Utilities Infrastructure Assessment dated 14 January 2020 (which still makes reference to Endeavour Energy Technical Review Request (EE Ref: ENL3127 – 2014/02306/0015) dated 5 September 2018. Endeavour Energy has no further comments.

Applicants Response

As noted in the above comments, Endeavour Energy have noted the response to the previous matters raised in the RTS report dated August 2020 and raise no further comment.

Transport for NSW

Table 2 of the TMAP Addendum indicates that the trip generation is calculated referencing trip rates used for MOD 4. However, it is noted that the Traffic Impact Assessment Report – Edmondson Park Frasers Town Centre Section 75W Modification (MOD 4) does not indicate details of trip rates.

Recommendation:

Details of the adopted rates, steps of how trip generation is estimated and trip distribution assumptions should be included in the documentation for review.

Applicants Response

The trip generation rates adopted are as per the approved TMAP from the Concept Plan approval (**MP10_0118**). The trip distributions for the portion of the concept plan area subject to a yield increase in MOD 5 have been detailed in the traffic model provided at **Appendix 3**. This has been detailed further in the ensuing section of this RTS.

The RtS report indicates that "a copy of the traffic modelling files will be submitted to RMS by AECOM".

Recommendation:

The requested information should be provided in line with the RtS for review. It is requested that the traffic modelling files be submitted to development.sydney@transport.nsw.gov.au for review and the applicant's consultant is encouraged to discuss with TfNSW in addressing the outstanding matters.

Applicants Response

The traffic modelling files are provided at **Appendix 3**. The traffic modelling files were previously provided to DPI&E however may not have been referred to TfNSW for comment.

The submission to the EIS provided by the former Roads and Maritime Services raised the following matters which have not been adequately addressed in the RtS:

- *Details in relation to the additional vehicle movements expected to use the existing intersections along Camden Valley Way; and*

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- *Alternative intersection treatment/design will need to be considered by the proponent at Bernera Road/Soldiers Parade/Croatia Avenue intersection, due to the change of intersection configuration.*

Recommendation:

The above matters should be further addressed in the RtS. An assessment of additional vehicle movement on Camden Valley Way and Campbelltown Road, in particular the adequacy of the right turn bays, should be undertaken. An alternative intersection treatment at Bernera Road/Soldiers Parade/Croatia Avenue intersection should be addressed, due to the change of intersection configuration, and an assessment should be undertaken to support the changing application for the Edmondson Park town centre.

Applicants Response

The MOD 5 proposal has been in process since late 2017 and exhibited late 2018. As part of the exhibition of MOD 5, TfNSW requested the additional traffic volumes that would likely use Soldiers Parade/Camden Valley Way intersection in its submission on the modification. Landcom have provided the additional traffic volumes in Table 22 and Appendix C of the amended TMAP provided at **Appendix 22** of the RTS. Traffic modelling has not been undertaken as it is assumed that when the upgrade of this intersection was completed, the future growth of the Edmondson Park precinct would have been considered in the intersection layout and operation.

The Bernera Road / Soldiers Parade / Croatia Avenue intersection is identified as a potential signalised intersection in the approved Concept Plan. This intersection was approved as part of MOD 4 to the Concept Plan.

In MOD 4 to the Concept Plan, Soldiers Parade's hierarchy was changed (previously Main Street) to a collector road and its speed limit increased, with higher volumes expected to use it as a result. As such, although the forecast 2026 traffic volumes may not meet the warrants for traffic signals, it is recommended that traffic signals are proposed at this intersection, consistent with what is already approved in the Concept Plan. This would future proof the intersection for the likely mixed-use development on the land parcels to the east of Soldiers Parade, and to also facilitate safe and efficient movement of pedestrians, cyclists and vehicle traffic.

Further consultation with Roads and Maritime Services (RMS) will be undertaken at the development application stage to gain in-principal approval for signals at the intersection.

Government Architect

We have reviewed the draft Design Excellence Strategy for Town Centre North and note that most of the amendments recommended by GANSW since the original exhibition period, have been incorporated into the document. However the following areas are still of concern:

1. **Design Excellence Strategy** (p15), in addition to an overview and outline of Design Guidelines, this section should also **list the key strategies** for ensuring design excellence ie Integrated Design team, Design Review, Tender Evaluation etc
2. **Design Excellence Approach** (p19) - Procedures for selecting preferred developers:
 - Assessment of EoI submissions – while 'design capability' is noted as one of a range of assessment criteria, it should be given a weighting that reflects the importance of design quality. This should include experience and track record of high quality design work as well and the experience and capability of proposed personnel.
 - As the second stage of the selection process requires a design response:
 - the evaluation committee should include registered architects as **voting members** of the committee. The proposal to seek advice from the DAP is noted, however this is advisory only and the DAP advice may not be adopted.
 - The weighting of the design criteria should reflect the importance of design quality, 50% or greater.

Applicants Response

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In relation to the Design Excellence Strategy, the Design Guideline is the key document which will ensure a high-quality design outcome while also providing certainty in the design process. The key strategies for ensuring design excellence are detailed in the roles and responsibility section. Each agency and stakeholder have a role to play in ensuring design excellence through each stage of the development process, as outlined below:

- Landcom proposes the modification including upgrade of the DCP to Design Guidelines.
- GANSW and DPIE have reviewed and made comments on the Design Guidelines.
- Liverpool Council is the determining authority and their Design Excellence Panel will ensure future development applications are consistent with the Design Guidelines.
- Creating an additional parallel approval processes separate to the development approval process is an unnecessary layer of bureaucracy.

In relation to the Design Excellence Approach, preparation of detailed design is not a requirement of EOI. In this regard, setting a design quality criterion of 50% has limited effect. Statutory processes are in place and will be used to assess design quality at the appropriate time. Collectively, the design guidelines established as a DCP, and whether triggered to State Significant or a Council DA, Design Review processes will take place.

It is Landcom's approach that Development Directors establish evaluation panels and assessment criteria for EOI review. During this phase, Landcom will seek advice from specialists, such as Design Review Panel in relation to the proposals design approach, and this may help inform decision making, however, only Landcom staff are voting members on the evaluation panel.

Regardless, Landcom carefully select development partners in recognition that the concepts developed will be ultimately built. In this regard, Landcom's focus on the proposal's capability and commitment to design quality rather than the detailed design expression of that commitment.

We note that all development applications (by Landcom or otherwise) will be subject to assessment by the Liverpool City Council Design Excellence Panel of which the GANSW is also a member. It is the assessment of the development application being consistent with the Design Guidelines will ensure the Design Excellence goals are met.

Department of Planning Industry and Environment

The modification application relies entirely on an amendment to the SEPP for the proposed height increases. As mentioned, MOD4 (which amended the Frasers Town Centre) took a different approach by amending the SEPP and also incorporating its proposed maximum building height (mirroring the SEPP Amendment) into a new condition. The key benefit of the MOD4 approach is that the height increases take effect as of the date of the modification approval in accordance with the condition, rather than at the conclusion of the SEPP Amendment process (noting the MOD4 SEPP Amendment has still not yet been gazetted).

From an administrative point of view the Department sees benefit in undertaking the primary assessment of the height increase as part of the modification application, rather than extracting this issue to form part of the separate SEPP Amendment process. In addition, given the similarities to MOD4, it is reasonable to expect MOD5 follow the same planning pathway as the approved MOD4.

In our discussion you confirmed you were open to taking the MOD4 approach. This being the case could you provide the following within your Supplementary Rts:

- *You amend your modification application to include the maximum height increase as part of the modification application*
- *Confirmation that you have no objection to the imposition of a condition (along the lines of MOD4) which includes the proposed maximum building height control for TCN (mirroring your proposed SEPP Amendment)*
- *Provide a new Concept Plan drawing showing the proposed maximum height of buildings for TCN (mirroring your proposed SEPP Amendment)*

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Applicant Response

In consideration of the above, the proposed modification has been amended to include the increase of building heights to between 12m and 50m in nominated locations (and up to 67m for one landmark building) as part of the modification to the Concept Plan and this has been demonstrated in the Height of Buildings Map provided at **Appendix 2**.

As such, Landcom raise no objection to the imposition of a condition to include the proposed maximum building height control for Edmondson Park Town Centre North as part of the Concept Plan, which will replace the height controls applicable in the Precincts SEPP.