

Department of Planning and Environment
Mr. Brendon Roberts
Team Leader Key Site Assessments
GPO Box 39
SYDNEY NSW 2001

Attention: Emily Dickson

By Email: emily.dickson@planning.nsw.gov.au

Dear Ms Dickson

Re: Exhibition of Modification to Edmondson Park South Concept Plan (Town Centre North and Precinct 3) (MP 10_0118 MOD5) and Planning Controls

I write in response to your letter dated 5 November 2018 inviting Council to comment on the above concept plan modification proposal for Edmondson Park Town Centre North.

Council resolved to oppose the above modification application at its meeting of 12 December 2018. Below is a copy of the minutes from the ordinary Council meeting and Council resolution.

ITEM NO: NOM 03
FILE NO: 334234.2018
SUBJECT: Edmondson Park Town Centre North

BACKGROUND

Landcom has requested a series of amendments to the relevant SEPP to allow the following changes to the Edmondson Park Town Centre North:

- *Increase number of dwellings from 440 to approx. 3,200.*
- *Amend site boundary to include 2.5ha of land owned by Office of Strategic Lands, which, according to its website, supports the strategic plan open space and land for public*
- *Reduce the area set aside for schools from 8 ha to 2 ha and allow residential on the area designated for schools.*
- *Reduce the bushfire protection zone from 50m to 15m.*

This proposed uplift in dwellings will only add to already congested roads and public transport. Furthermore, the suburb does not have a single public primary or secondary school, little to no suitable open space and woefully inadequate parking at Edmondson Park Station.

Unsurprisingly, local residents are opposed to these amendments.

NOTICE OF MOTION (submitted by Cllr Hagarty)

That Council:

- 1. Support local residents in opposition to this amendment; and*
- 2. Continue to advocate to both the State and Federal Governments for better existing and additional public infrastructure and services, including schools, hospitals, police, roads and public transport, especially in growth areas of the LGA.*

COUNCIL DECISION

Motion: **Moved:** Cllr Hagarty **Seconded:** Cllr Karnib

That the recommendation be adopted.

On being put to the meeting the motion was declared CARRIED.

Council also provides the following advice:

Development Density

- The increase in density within the town centre has not been adequately substantiated. The impacts of higher density development within Edmondson Park will need to be assessed having regard to the already approved increased density on the southern side of the town centre (Frasers Town Centre) and also from a regional perspective.

Economic Impacts

- There is a significant housing to jobs imbalance in Liverpool, which this modification will exacerbate. The proposed residential density increase is not supported by an increase in jobs.

Zoning Clarification

- The draft concept plan amendment includes detail to prohibit residential flat buildings in certain parts of the precinct via an additional permitted use clause. Residential flat buildings are a mandatory permitted use in the R1 zone under the standard instrument. Land for which RFBs are not desired should be zoned R2 or R3.

Social Infrastructure

- The proposal has not considered the cumulative demand for social infrastructure reflecting the high density development proposed.
- Future population estimates of the proposal is inadequate. The population estimates provided in the social infrastructure assessment report assumes an average occupancy rate of 2.15 persons per dwelling for Liverpool. According to 2016 Census data, the average occupancy rate per household is between 3.32 to 4.83 persons within a 2km radius of the subject site.
- The increased population in Edmondson Park will generate an increased demand for educational facilities in the area. This proposal seeks to reduce the land available for educational facilities.
- There is a need for additional Out of School Hours Care (OSHC) and Vacation Care for residents within the area. Services provided within the area are at capacity and do not adequately cater to families with primary school-aged children.
- The proposal has not addressed the need for a community health centre

Open Space and Active Recreation

- The demand assessment by the proponent identifies the need for open space (passive and active) for the subject development as a total of 2.4ha. This figure is below the Council's benchmarks even in a scenario where the average occupancy rate is calculated at 2.15 persons per dwelling.

Housing Diversity and Affordability

- The proposal does not specify the amount of affordable housing that the development will provide having regard to the district plan target of 5-10% affordable housing on any uplift.

Public Transport and Car parking

- The demand for commuter car parking at the station has already exceeded the capacity of the existing car parks. As development takes place in the surrounding areas this demand is likely to increase without intervention. No consideration has been given to providing a multi-deck facility nor any indication as to the future of the existing facility.

Traffic Impacts

- The proposed modification is expected to generate significant traffic volumes of approximately 1,800 vehicular trips during the PM peak. The additional traffic is

expected to significantly impact the surrounding road network and will require road improvements.

Infrastructure Funding

- The modification proposal lacks the funding provisions to provide essential infrastructure within the town centre. A framework to address the local and regional infrastructure demand has not been provided.

For further enquiries regarding this matter, please contact Masud Hasan, Senior Strategic Planner on 8711 7383.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Smith', with a stylized flourish at the end.

David Smith
Manager Planning and Transport Strategy