

Edmondson Park Town Centre (Mod 4)

Response to Submissions

Issue	Comment																									
Department of Planning & Environment																										
Description of the Proposal																										
Please provide the following: • the area of the Frasers Town Centre (in m² or hectares);	An Area plan illustrating the area of the Frasers Town Centre, including and excluding the EPTC reserve is included at Attachment L . The total site area of the Frasers Town Centre is 26.1 hectares.																									
• a breakdown of the approximate number of residential dwellings between the Town Centre Core and Residential Precincts;	The approximate dwelling breakdown is: - Town Centre Core: 992 - Residential Precincts: 892																									
• a comparison of the proposed amount of commercial and retail floor space to the approved Concept Plan; and	The approved Concept Plan included 35,000-45,000m² of commercial and retail floor space. The Modification does not seek to amend the amount of approved commercial and retail floor space.																									
• a clear outline of which roads and public domain would be transferred to Council or other public authorities and which would be retained in private ownership.	A plan illustrating which roads and public domain are intended to be transferred to Council or other public authorities and which will remain in private ownership is included at Attachment E .																									
• the retail and residential uses assumptions used in determining the total GFA sought in the town centre;	Noting that the Town Centre Concept is indicative, the following table breaks down the assumptions in terms of retail / apartments for each quadrant. It is important these numbers do not form part of the approval as they very likely to change as the detailed design evolves. <table><tr><th>Quadrant</th><th>Approximate Retail GFA</th><th>Community & other Misc Uses GFA</th><th>Approximate Residential Apartments</th><th>Maximum Total GFA</th></tr><tr><td>NW</td><td>800</td><td>250</td><td>189</td><td>20,000</td></tr><tr><td>SW</td><td>7,400</td><td>250</td><td>443</td><td>56,500</td></tr><tr><td>NE</td><td>17,000</td><td>250</td><td>250</td><td>45,000</td></tr><tr><td>SE</td><td>6,200</td><td>2,750</td><td>110</td><td>23,525</td></tr></table>	Quadrant	Approximate Retail GFA	Community & other Misc Uses GFA	Approximate Residential Apartments	Maximum Total GFA	NW	800	250	189	20,000	SW	7,400	250	443	56,500	NE	17,000	250	250	45,000	SE	6,200	2,750	110	23,525
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• a table providing a direct comparison between the proposal and approval, specifically providing: a) the area within the Frasers Town Centre; b) the land area designated for purposes that won't accommodate gross floor area (GFA), e.g. roads, open space and other infrastructure; c) the non-residential GFA and the residential GFA; d) assumed efficiency of residential buildings; e) dwelling numbers (in the current approval instrument, and proposed by the modification); and f) the average dwelling size (in relation to the current modification, split this into the Town Centre Core and Residential Precincts).	The approved Concept Plan did not provide the level of resolved detail requested by the Department to enable a direct comparison. Noting that the Town Centre Concept is indicative, the following numbers have been provided where possible to assist the Department with its assessment along with an Area Plan at Attachment L . However, where these numbers are based on the indicative scheme they should be treated as indicative and could change. a) 26.1 Ha b) 13.4 Ha c) Approximate retail GFA of 31,400m² Approximate residential GFA of 185,000m² d) The GBA to GFA efficiency was 73% e) Approved: 912 Proposed: 1884 f) TCC: 80m² RP: 117m²																									
Height and Gross Floor Area																										
Please provide the following: Mechanisms to ensure the distribution of height and GFA across the site is generally in accordance with the Town Centre Core Concept Design Report and Illustrative Scheme and the Residential Precincts Concept Design Report and Illustrative Scheme. This is required (amongst other reasons) to gain an accurate and meaningful understanding of overshadowing and visual impacts;	The proposed planning framework currently provides the mechanisms to ensure that the distribution of height and GFA across the site is generally in accordance with the Illustrative scheme, whilst still providing appropriate flexibility for those designs to changes as the detailed design process evolves. Specifically, within the Town Centre Core the GFA that is proposed for each quadrant has been informed by the illustrative scheme. Accordingly, any changes to the massing in one location will necessitate a redistribution of floor area from another part of the quadrant. The form is then further controlled by the Town Centre Design Guidelines which stipulate, for example, that there is only one landmark building. Therefore even if all the GFA was consolidated from a quadrant into two																									

	<p>landmark towers, it would not be consistent with the Design Guidelines and therefore not consistent with the Concept Plan.</p> <p>In the Residential Precincts, the Design Guidelines establish even more defined built form controls, setting specific heights amongst other parameters for each of the different building typologies.</p> <p>As a result, the current illustrative scheme can be used as the basis for a meaningful assessment of the overshadowing and visual impacts.</p> <p>In response to the Department's comments the Design Guidelines have been revised (see Attachment C) to include additional design solutions around the distribution of height in the Town Centre Core.</p>
<p>The following plans referred to in the proposed modifying instrument:</p> <ul style="list-style-type: none"> ▪ Frasers Town Centre Maximum Height of Buildings Plan; and ▪ Frasers Town Centre Maximum GFA Plan. 	The plans have been re-provided at Attachment B .
Demonstration of how the increased building heights and housing yield are achieved given there is no proposed net increase in the Frasers Town Centre gross floor area; and	<p>Under exhibited Concept Plan no FSR and only 810 dwellings were proposed across the entire town centre. In its list of issues, the Department requested that Landcom demonstrate how the town centre was contributing to the provision of housing around the Government's investment in infrastructure, indicating that <u>the provision was too low</u>. In response Landcom increased the <u>minimum</u> number of dwellings to 912 and proposed an FSR of 2.5:1. The proposed FSR was intended to reflect the desired density for the town centre but had no direct correlation with the <u>minimum</u> number of dwellings and the proposed commercial and retail floor space. In drafting the Concept Approval, the minimum number of dwellings provided by Landcom was incorrectly written as an 'approximate' number.</p> <p>Therefore, despite there being no net increase in FSR the Modification seeks to increase the 'approximate', number of dwellings, as referred to in the Concept Plan, so that the number referenced in the Concept Plan approval appropriately reflects the number of dwellings planned, noting that within the Residential Precincts this number is still well below what could be achieved under the FSR.</p>
An indicative height and floor space ratio of the proposed development in the Residential Precincts. Please address any potential conflict between the scale of development anticipated by the Residential Precincts Concept Design Report and Illustrative Scheme and the Edmondson Park Town Centre Design Guidelines and the retained 24 metre height control and 2.5: 1 floor space ratio (FSR) controls in the State Environmental Planning Policy (State Significant Precincts).	The indicative height and FSR within the Residential Precincts is 11m and 0.55:1. Whilst it is noted that the height and density are less than that provided under the SEPP controls, which are not proposed to be changed, Frasers does not want to lower the planning controls which would have a corresponding impact on the value of the land it has purchased. As the Concept Plan prevails to the extent of an inconsistency if in the future, if Frasers did decide that it wanted to investigate additional density in the residential precincts consistent with the SEPP a further Concept Plan Modification would be required and the associated environmental impacts would be considered at that time.
Please advise on Frasers position on duplicating the height and GFA controls in the CP in the SEPP	Frasers is supportive of the Department's suggestion to include the height (in RLs) and GFA controls for the Town Centre Core in the SEPP as well as the Concept Plan. However, it is requested that instead of breaking the GFA and height up into quadrants, as per the level of detail in the Concept Plan, the SEPP just adopt a blanket maximum GFA and height for the entire town centre core.
Edmondson Park Frasers Town Centre Design Guidelines	
The Department provided a list of detailed comments on the Draft Design Guidelines.	The Design Guidelines (see Attachment C) have been revised to include further detail as requested.
Development application staging	
Please outline the staging program for development applications in the Frasers Town Centre.	<p>The indicative staging program for DAs is:</p> <ul style="list-style-type: none"> - Sales and Marketing Centre – Approved February 2017 - Bulk Earthworks Town Core and Residential Precinct – Approved March 2017 - Sales and Marketing Centre Subdivision of Land – Approved February 2017

	<ul style="list-style-type: none"> - Town Centre Core Roads and Infrastructure - Town Centre Core Stage 1 Retail - Town Centre Core Stage 1 Residential - Residential Precinct 1 Stage 1 DA - Residential Precinct 1 Stage 2 DA - Residential Precinct 1 Stage 3 DA - Town Centre Core Stage 2 Retail - Town Centre Core Stage 2 Residential - Residential Precinct 2 Bulk Earthworks - Residential Precinct 2 Roads and Infrastructure - Residential Precinct 2 Built Form - Residential Precinct 3 Bulk Earthworks - Residential Precinct 3 Roads and Infrastructure - Residential Precinct 3 Built Form
Traffic and Transport	
Please provide an assessment of the proposed modification's impact on commuter car parking capacity at Edmondson Park Railway Station;	<p>The commuter car park is outside of the Frasers site and its capacity is the responsibility of Transport for NSW.</p> <p>The proposed Modification seeks to provide a Transit Orientated Development which redistributes density in the Town Centre closest to the Station, and establishes a public domain framework that will create walkable pedestrian friendly neighbourhoods that encourage people inside and from outside the town centre to walk rather than drive.</p> <p>On the above basis, the dwellings inside the Town Centre are very unlikely to impact on the capacity of the commuter car park and the provision of the town centre and improved pedestrian connectivity to the south could in fact reduce the demand on the commuter car park.</p> <p>It is likely that Frasers will need to introduce time limited parking within the basement retail car park and work with Council regarding setting up a management framework for the on-street car parking in the Town Centre to manage commuters using those parking spaces.</p> <p>Frasers would support Transport for NSW investigating provision of additional commuter car parking on the existing commuter car park site to address the concerns regarding its capacity, but notes that it is not Frasers responsibility to provide commuter car parking, nor is the Frasers development likely to contribute to its demand.</p>
<p>Clarification of</p> <ul style="list-style-type: none"> the model's expected residential population with the Concept Plan area. The increase in residential trip generation in the AM and PM peaks appears incongruous with the increase in dwelling numbers. Section 2.2 of the Edmondson Park Town Centre Section 75W Traffic Modelling Report states the residential dwelling increase with the Frasers Town Centre will be offset by reductions elsewhere in Edmondson Park South. Please clarify if the residential trip generation assumes this offset; and the model's assumptions about student numbers at schools in Edmondson Park. 	<p>Following receipt of the RMS / TfNSW comments regarding the assumptions used, the modelling was rerun by AECOM and a revised Traffic Report is included at Attachment K.</p>
Development Contributions	
Please provide further details of the proposed Planning Agreement, including inclusions in the offer and the timing of the offer and its execution.	<p>Frasers intends on making a formal offer to Council to enter into a VPA very shortly. The offer will include a \$26 million contribution, less the agreed works in kind and land dedicated in the precinct with Council. The VPA will also set out the requirement for Frasers to deliver a range of other additional public benefits on top of the contributions calculated in</p>

	<p>accordance with Council's s94 plan, including, but not limited to: public art, childcare, moderate income dwellings, leading sustainability, and community facilities.</p> <p>A presentation made to Council outlining the robust methodology adopted to determine the \$26 million contribution is included at Attachment M for the Department's reference. As detailed in the presentation, Frasers' approach uses Council's existing Edmondson Park Section 94 Plan to determine the baseline contribution (i.e. the approved density), it then determines what additional contributions are required for the increase in dwellings based on the methodology for each of the infrastructure categories set out in the plan. The presentation is supported by technical letters from the traffic and stormwater engineers in relation to the additional impact generated by the increase in dwellings for each of those categories.</p> <p>In summary, the proposed offer will provide for the identified contributions and infrastructure in Council's Section 94 plan, provide additional contributions towards the increased demand generated by the additional dwellings, and deliver a range of other additional public benefits on top of what would otherwise be required.</p> <p>It is noted that the drafting and execution of a VPA typically takes an extended period of time and it would not be appropriate for the delivery of the Town Centre to be delayed, when the principles of the offer have already been made. Accordingly, Frasers will continue to keep the Department informed regarding its discussions with Council as they progress. As reflected in the amended Statement of Commitments Frasers intention is to enter into the VPA prior to the OC of the first dwelling.</p>
Studio Dwellings	
Please provide additional explanation/justification as to why studio dwellings should be explicitly included as a listed permissible land use and potentially whether attached dwellings should also be included.	<p>The reason 'Studio Dwellings' was sought as a nominated permissible use, noting that any development not identified as prohibited is permissible in the B4 zone, was on the basis that 'studio dwellings' are not included in the SEPP's listed definitions and the SI LEP / Liverpool LEP. Frasers are concerned that it could be ambiguous as to whether the use was permissible, and therefore to avoid any doubt it is considered safer to specifically list it as a permissible use. We do not think the same issue applies for attached dwellings because they are defined in the SI LEP, however it is noted that Frasers have no issue with them also being included as a listed use.</p>
Draft South West District Plan	
Please provide an assessment of how the proposed Modification is consistent with the South West District Plan.	<p>The proposed Modification is consistent with the Draft South West District Plan (SWDP) as:</p> <ul style="list-style-type: none"> ▪ It continues to provide non-residential uses that contribute to the economic development of the South West consistent with 'Section 3 A Productive City'. ▪ The proposal strongly reinforces and is consistent with Section 4 A Liveable City as: <ul style="list-style-type: none"> - The increase of housing in the Town Centre will contribute with the achievement of '4.3.4 Deliver South West District's five-year housing targets' and fulfil the Department's aim to accelerate housing supply in the South West District. Notably, the SWDP identifies Edmondson Park as a Priority Growth Area with significant capacity for housing supply. - It will contribute to the achievement of '4.4 Improve housing diversity and affordability' by providing a diverse range of housing options on the site and increased amounts of moderate income housing that will significantly contribute to housing affordability. - It is focused on the delivery of the winning bid scheme to Urban Growth which was focused on the creation of a great place and not just housing, consistent with 4.6 'Create great places – not just building houses' and 4.7

	<p>'Foster cohesive communities in the South West District'. Notably, the proposed yield was determined following design led planning regarding how many dwellings could be achieved following the detailed urban design and environmental studies.</p> <ul style="list-style-type: none"> It delivers on '4.6.2 Plan for safe and healthy places' and '4.6.3 Enhance walking and cycling connections' through promoting a TOD mixed use town centre that encourages walking and public transport patronage, not only within the Town Centre but for the lower density residential areas outside the centre. The increase in density and town centre design incorporating retail activation will further contribute to creating a safe environment for pedestrians. It commits to delivering world class sustainability, consistent with Section 5 A Sustainable City.
Liverpool City Council	
Edmondson Park Town Centre Design Principles in the Edmondson Park South DCP 2012	
The existing DCP provides key design principles for the Town Centre. It is considered that the current proposal should satisfy these principles.	The Design Guidelines were informed by the DCP key design principles. It is noted that Council has only raised issue with 3 of the 25 principles, which are discussed further below.
<p>25. <i>All large format retail premises and decked parking areas, visible from prominent public areas, are to be sleaved with active uses. Blank walls visible from the public domain are to be limited.</i></p> <p><u>Council response</u></p> <p>The proposal does not satisfy this in a significant way. The plans and the levels shown on those plans indicate blank walls along significant portions of the surrounding streets. Amendments need to be made to the proposal. It is considered that these can be achieved without significant impact on the development but with greater public benefits.</p>	<p>Frasers wishes to minimise areas of blank walls visible from the public domain and acknowledges that the indicative design could be improved to provide greater activation. The Design Guidelines have been updated to include an additional provision to ensure this occurs as part of the detailed design phase.</p>
<p>27. <i>Create a main street characterised by pedestrian-friendly local traffic.</i></p> <p><u>Council response</u></p> <p>Clarification of the status of the internal streets is needed.</p>	<p>It is Frasers strong desire that the Main Street be a pedestrian friendly environment. The Design Guidelines have been amended to include this as an additional key element in Table 1.</p>
<p>31. <i>Any future application within the Town Centre must be supported by a detailed traffic and transport study, including a micro-simulation model. The study should identify appropriate bus priority measures along the main street and ensure integration with the transport interchange.</i></p> <p><u>Council response</u></p> <p>It is considered that this is an important matter that should be retained so that Council adequately assess the development as it unfolds.</p>	<p>The detailed traffic and transport study, including a microsimulation model has been provided as part of the Concept Plan Modification. The study has been done up-front in order to determine the traffic impacts of the modified Town Centre to enable a holistic understanding of the impacts and necessary upgrades. Undertaking this work up front means that if development is delivered in accordance with the Concept Plan it becomes unnecessary and unreasonable to do it with each individual DA. Accordingly it is more appropriate to require a traffic study that considers the development consistency with the Traffic Study prepared as part of the subject modification, rather than undertake micro simulation modelling each time.</p>
Lack of prior consultation with Council	
<p>It is noted that many of the background reports were completed earlier in 2016 and that there has been no discussion with Council prior to the exhibition of the proposed changes. It would appear that the design of the proposal has reached an advanced stage without any discussion with Council.</p> <p>Council would wish to avoid any suggestion that the form of the development has been finalised. Council was advised of the exhibition the day before it commenced. Council does not consider this to be appropriate consultation.</p> <p>Accordingly, Council seeks to meet with staff of the OPE to further discuss the Concept Plan Modification.</p>	<p>Frasers strongly disagrees with the comment that there has been a lack of consultation with Council. Frasers was required to undertake extensive background work as part of the bid process with Urban Growth. Once appointed as the successful tender, Frasers met with Council on 8 separate occasions leading up to lodgement of the Section 75W. This includes meetings with Council planning staff, traffic department, Mayor and General Manager, as well as a formal briefing to the Councillors. Frasers took the feedback provided as part of that consultation and incorporated it into the Section 75W submission where possible. Frasers has no objection to Council meeting with the Department.</p>
Only part of the overall centre	

<p>The Concept Plan Modification forms only a part of the town centre. It is unclear what is proposed to take place in the rest of the town centre. However it remains unclear whether similar changes are proposed on the rest of the land in the vicinity of the railway station. Council seeks clarification on the rest of the planning of Edmondson Park Town Centre.</p>	<p>Frasers can only propose modifications within the part of the town centre it controls. The remainder of the town centre has a structure plan and planning controls in place under the current Concept Plan and SEPP listing, and for the purposes of the environmental assessment it has been assumed that these controls will remain in place. Should Urban Growth NSW and the other land owners in the town centre seek to make changes to the remainder of the town centre the Department and Council will need to consider those changes at that time.</p>
Infrastructure Required	
<p>It is noted that there will be additional commercial and residential development on the site. In particular it will more than double the number of dwellings in the immediate town centre. It remains unclear whether there will be similar increases in dwelling yield elsewhere on land around the Edmondson Park Railway Station.</p> <p>While Council is not opposed in principle to higher density around the railway station, it is concerned that it would appear that consideration has not been given to any increase in demand for public infrastructure in a holistic manner. While mention is made of development contributions and an offer for a Planning Agreement, it is considered that insufficient attention has been given to the provision of public infrastructure.</p> <p>In relation to public open space it is noted that additional open space is proposed within the site. However, the area of this has not been quantified and no research has been provided to show that this is sufficient for the additional population. Consideration should be given to the proponent contributing to embellishment of the regional parkland.</p> <p>In relation to drainage it is noted that the original drainage strategy for the area anticipated an impervious area co-efficient of 0.95. The plans submitted with the submission in relation to the town centre core west of Soldiers Parade show that the site has 100% impervious cover. The residential development similarly appears to have 100% impervious cover.</p> <p>There needs to be research undertaken on the infrastructure required to support the substantially increased development in the town centre.</p>	<p>As noted above Frasers can only address the land within its control and cannot comment on whether other land owners intend on increasing the dwelling within other parts of the town centre, noting that they would need to lodge a separate modification to the Concept Plan if they intended to do so.</p> <p>Since Council's submission Frasers has commenced discussions with Council regarding the development contributions towards public infrastructure, and a formal offer to enter into a Planning Agreement will be made shortly.</p> <p>Section 6.2.2 of the Section 75W EAR considers the open space provision in detail. The assessment demonstrates that, despite the increase in density the open space provision proposed will:</p> <ul style="list-style-type: none"> - exceed the 2.83 Ha Open Space benchmark for the Concept Plan site with 20.7 Ha per 1000 people; - exceed the Department of Planning and Environment's Recreation and Open Space Planning Guideline 2012 (ROSP Guideline) Open Space benchmark of 15% for the Concept Plan site with 49% open space; - exceed the ROSHP Guideline for local open space of 5.5% within the Town Centre with 7.34% open space; and - provides alternative open spaces that meets recreation needs not otherwise provided for within the region to meet the specific needs of the community. <p>JWP maintain that the original drainage strategy did not indicate a specific impervious area. Whilst the TCC is impervious the Residential Precincts will have pervious areas (approximately 80/20). The specific number is not known at this time and there is significant work that needs to be done as the town centre design evolves, however, it does not change the overall strategy for stormwater which relies on draining to Raingarden 14. Frasers and Council will need to work together in relation to the design of the raingarden to ensure it is designed and sized appropriately as part of the detailed design phase. Frasers will make a contribution to the stormwater infrastructure within Edmondson Park, as appropriate for the load created by the development.</p>
Schools	
<p>It is noted that there were originally 3 primary schools planned for Edmondson Park (Liverpool and Campbelltown components). This has subsequently been reduced to 2 primary schools. It is unclear whether the additional dwellings will create the need for the need for an additional school.</p> <p>There needs to be consideration as to whether additional primary school capacity is required.</p>	<p>The provision of new schools and capacity is the responsibility of the Department of Education. Frasers supports the provision of school capacity to accommodate the development within Edmondson Park and is currently in discussion with the Department of Education regarding the future potential to accommodate a Vertical High School in the town centre itself. However, any future proposal for a school will be subject to a separate modification.</p>
Legal status of Design Guidelines	
<p>It is noted that it is proposed that the Edmondson Park South Development Control Plan 2012 no longer apply to the site. It is proposed that assessment now be subject to the Edmondson Park Frasers Town Centre Design Guidelines Rev_1: March 2016.</p> <p>Clarification is sought as to the validity of these. It is noted that S79C identifies a development control plan as a consideration but makes no mention of</p>	<p>The proposed modification to Condition C1.3 in the Concept Plan Terms of Approval requires that:</p> <p>"Any future development application within the Frasers Town Centre must demonstrate it is generally in accordance with the... Frasers Town Centre Design Guidelines".</p> <p>Under clause 3B of Schedule 6A Transitional arrangements – repeal of Part 3A in the EP&A Act, it states that:</p>

anything like design guidelines. While it is acknowledged that the work undertaken so far by Frasers is quite detailed there is no certainty that there won't be substantial changes. It would appear that the Design Guidelines have no legal validity in the assessment of development in the future.

In this regard it is considered that there is an onus on the DOPE to show the legal basis for this. It is suggested that information should be provided as to whether this concept has been adopted in any other circumstances.

It is suggested that Design Guidelines be revised and incorporated into the DCP and include a requirement for the preparation of a masterplan for the site. The masterplan would deal with the three dimensional spatial structure of a site. It is noted that there are problems with the resolution of the 3 dimensional structure of the site.

(d) a consent authority must not grant consent under Part 4 for the development unless it is satisfied that the development is generally consistent with the terms of the approval of the concept plan,

Therefore notwithstanding the absence of a 'DCP', under the EP&A Act the consent authority must not grant consent for development application, subject to a Part 3A Approval, unless it is satisfied that the development is generally consistent with the terms of the approval, which in this case requires the development to demonstrate its consistency with the Guidelines.

Accordingly the Guidelines are not only legally valid they provide greater certainty than a DCP. This approach has been adopted by the Department for a number of Part 3A Concept Plans, in particular where they were accompanied by an SSS listing, including but not limited to:

- Barangaroo
- The former UTS Ku-ring-gai site
- Shell Cove, Shell Harbour

Design

The Design Guidelines (in the form of a DCP) need to be revised to incorporate the following:

Town Centre Design

- Provide accurate drawings showing the terrain and proposed built form.

Due to the size and complexity of the Town Centre and the long period of time over which it will be delivered, it is not appropriate or possible to include a specific built form outcome at the Concept Plan stage. The Concept Plan and accompanying Guidelines are intended to provide a framework for the assessment of the future built form using maximum parameters and design principles.

Ownership, Management and Accessibility

- Clarify that the town centre core streets are publicly accessible at all times.
- Clarify which of the residential streets will be public streets.
- Clarify that photographing will be permissible at all times, i.e., residents and visitors will interpret these streets as unrestricted public spaces at all times.
- Clarify the range of uses and events in the streets and town square.
- Clarify how flexible uses and opening hours can be incorporated.
- Ensure that any privately owned road will not incur any cost to Council such as street lighting installation and maintenance.
- Ensure that car parking restrictions on the street are to be controlled by Council.
- Ensure that any areas of the shopping centre that are to be closed are to be agreed with Council (the laneways etc.).

Frasers can confirm:

- The town centre core streets are publicly accessible at all times.
- The plan at **Attachment E** illustrates which of the residential streets will be public streets.
- Photography will be permissible at all times,
- The range of uses and events in the streets and town square have not been determined but Frasers is committed to working with Council regarding the development of these items.
- Any privately owned road will not incur any cost to Council such as street lighting installation and maintenance.
- Frasers would support car parking restrictions on the street to be controlled by Council.
- Frasers would support that any external areas of the shopping centre that are to be closed are to be agreed with Council.

Open Space

- Identify the open space as public open space.
- Clarify whether the area of any open space areas are proposed to be allocated for the exclusive use of residents of the site.
- Clarify the area and allocation of communal areas above podiums in accordance with the ADG for the multi storey residential buildings.

A plan illustrating which roads and public domain are intended to be transferred to Council or other public authorities and which will remain in private ownership is included at **Attachment E**.

The final design of the above podium areas has not been completed, however the podium rooftops will combine publicly accessible open space areas and private communal open space in accordance with the ADG.

Streets

- Streets around taller buildings in and around the town centre core should have generous footpath widths and sufficient room for tree canopies. The Design Guide needs to be amended to show how this is achieved.
- The Design Guide should be amended to identify the building line to show how the above item is achieved.
- Streets within the town centre core will be located above basement car parking. The Design Guide

Some of the information Council has requested forms part of the Public Domain Plan. The modified instrument of approval sought for the Public Domain Plan to be explicitly approved for future applications to demonstrate their consistency with the Plan.

Where appropriate, the Public Domain Plan and Design Guidelines have been updated to reflect the additional details Council has requested, see **Attachments D and C**.

Within the TCC tree pits have been designed into the structure of the basement to ensure there is adequate planting depth. A section has

<p>should be amended to show how tree planting and landscaping can be achieved in these streets.</p> <ul style="list-style-type: none"> • The Design Guide should be amended to ensure that there is no projection of buildings over the street reserve to avoid any compromise of street tree planting. • The Design Guide should be amended in relation to Local streets and the Mews to ensure that there is distance between street tree planting the upper level of the buildings where these are located close to the front boundary. 	<p>been added to the Public Domain Plan (see Page 24) to demonstrate how this will be achieved.</p> <p>The street sections have been designed in conjunction with the adjoining buildings to ensure there is sufficient distance between street trees and the upper levels of buildings.</p>
<p><u>Community Facilities within Town Centre</u></p> <ul style="list-style-type: none"> • The Design Guide will need to be amended once discussions on the location of the community facility has been agreed to. 	<p>The future location of the community facilities will be developed in close collaboration with Council. The Design Guidelines identify that the community uses are to be centrally located to maximise accessibility to all dwellings and that a community facility is provided within the Town Centre Core. It is not necessary to update the Design Guidelines to specifically identify the location of the community facility which will ultimately be decided between Council and Frasers as part of the detailed design phase.</p>
Commuter Car Parking	
<p>Consideration needs to be given to the impact of commuter car parking demand on the proposed development.</p>	<p>The commuter car park is outside of the Frasers site and its capacity is the responsibility of Transport for NSW.</p> <p>The proposed Modification seeks to provide a Transit Orientated Development which redistributes density in the Town Centre closest to the Station, and establishes a public domain framework that will create walkable pedestrian friendly neighbourhoods that encourage people inside and from outside the town centre to walk rather than drive.</p> <p>On the above basis, the dwellings inside the Town Centre are very unlikely to impact on the capacity of the commuter car park and the provision of the town centre and improved pedestrian connectivity to the south could in fact reduce the demand on the commuter car park.</p> <p>It is likely that Frasers will need to introduce time limited parking within the basement retail car park and work with Council regarding setting up a management framework for the on-street car parking in the Town Centre to manage commuters using those parking spaces.</p> <p>Frasers would support Transport for NSW investigating provision of additional commuter car parking on the existing commuter car park site to address the concerns regarding its capacity, but notes that it is not Frasers responsibility to provide commuter car parking, nor is the Frasers development likely to contribute to its demand.</p>
Public Ownership of Infrastructure	
<p>All costs associated with private roads shall be borne by the developer and the owners. In particular all street lights within private roads shall be provided at the cost of the developer and maintained at the cost of owners of the street.</p>	<p>Noted. Frasers supports this request and has included a new Statement of Commitment (89) (see Attachment D) regarding these matters.</p>
<p>Legal provisions such as easements should be incorporated into private streets to ensure continued public access.</p>	
<p>The road ways of the Mews should be designed to maintain through pedestrian and cycle access.</p>	
<p>Freedom of pedestrian movement within the streets and freedom to take photographs.</p>	
<p>Ability to have events in the plaza area.</p>	
<p>Streets remaining open 24 hours per day with the option of street closures for events.</p>	
<p>Parks should be dedicated to Council free of charge.</p>	<p>Selected parks (as shown at Attachment D) will be dedicated to Council.</p>
Planning Agreement	

<p>Council would not support a Planning Agreement which effectively substitutes items such as the additional open space and traffic signals for the items already in the contributions plan for Edmondson Park. It is considered that as the proposal involves a substantial increase in the number of dwellings that additional infrastructure should be provided and form part of any Planning Agreement.</p> <p>Council considers that a Planning Agreement should be negotiated prior to approval of the modification.</p>	<p>Frasers intends on making a formal offer to Council to enter into a VPA in the next week. The offer will provide additional contributions to reflect the increase in the number of dwellings.</p> <p>It is noted that the drafting and execution of a VPA typically takes an extended period of time and it would not be appropriate for the delivery of the Town Centre to be delayed, when the principles of the offer have already been made. Accordingly, Frasers will continue to keep the Department informed regarding its discussions with Council as they progress in parallel with the Concept Plan. As reflected in the amended Statement of Commitments Frasers intention is to enter into the VPA prior to the OC of the first dwelling.</p>
Peripheral uses	
<p>The concept modification should encourage ancillary uses around the periphery of the town centre core. This is also related to problems with the levels around the periphery of the town centre core, which result in blank walls to the surrounding streets.</p>	<p>Frasers wishes to minimise areas of blank walls visible from the public domain and acknowledges that the indicative design could be improved to provide greater activation. The Design Guidelines have been updated to include additional provisions to ensure this occurs as part of the detailed design phase.</p>
Suggested changes to the Edmondson Park South Concept Plan Consolidating Instrument of Approval	
<p>Conditions A1.1(d), B1.1, and 1.3 should continue to require a DCP</p>	<p>As explained above, the Design Guidelines perform the role of a DCP for the Town Centre and provide Council with greater certainty than a DCP, accordingly it would not be appropriate to also require a DCP in addition to the Design Guidelines.</p>
<p>Condition C1.6 should not be amended as Council should have the right to assess each application in detail in relation to traffic.</p>	<p>As explained above the detailed traffic and transport study, including a microsimulation model has been provided as part of the Concept Plan Modification. The study has been done up-front in order to determine the traffic impacts of the modified Town Centre to enable a holistic understanding of the impacts and necessary upgrades. Undertaking this work up front means that if development is delivered in accordance with the Concept Plan it becomes unnecessary and unreasonable to do it with each individual DA. Accordingly it is more appropriate to require a traffic study that considers the development consistency with the Traffic Study prepared as part of the subject modification, rather than undertake micro simulation modelling each time.</p>
<p>Condition C1.20 should not be amended as the development appears to have increased impervious surfaces and may increase stormwater runoff Flood mitigation measures over and above the existing drainage strategy may be required.</p>	<p>As noted above, the Modification has not increased impervious areas however more detailed design will be required. This will result in further work with Council regarding the Rainwater Garden but does not impact on flooding as the site is not currently flood effected. The proposed modification to C1.20 only seeks to remove the requirement to lodge a flooding report for each DA where it is not required, and does not remove the requirement for the DA to lodge a Stormwater Management Plan.</p>
Suggested changes to the Statement of Commitments	
<p>Commitment 7b should be clarified as to whether the Planning Agreement must be entered into or that the proponent is required to offer to enter such. The timing should be amended to issue of a construction certificate.</p>	<p>The intention as reflected in the commitment is that Fraser will enter the VPA prior to OC for first residential building.</p>
<p>Commitment 9: The development should be in accordance with the current DCP even if modified.</p>	<p>This commitment requires development to be generally in accordance with Parts 1.1, 1.2, 2.11, and 3.8 of the Liverpool DCP. Parts 1.1, 1.2 are the general vision and objectives in the DCP. 2.11 no longer exists in the DCP and 3.8 is the Edmondson Park DCP, which applies to development outside of the Frasers Town Centre regardless. In light of this, this commitment is redundant and is still proposed to be deleted.</p>
<p>Commitment 11: Should be amended to require a masterplan.</p>	<p>Council suggestion relates to a Masterplan being prepared for the part of the Edmondson Park South Town Centre to the north of the South West Rail Link, which is not part of the land under Frasers Control and therefore it is not in a position to amend the commitments to require such a document to be prepared. However, it is noted that the Department could impose a condition to that effect if it considered it necessary.</p>
Office of Environment and Heritage	
<p>It is noted that there are no State or locally listed heritage items within or in the immediate vicinity of the proposed Frasers Town Centre. The site is not in the proximity of the State heritage listed Ingleburn</p>	<p>Noted. Any impacts on the Ingleburn Military Heritage Precinct will be considered where appropriate as part of the SHI's to support the DAs for the detailed buildings.</p>

<p>Military Heritage Precinct (SHR01891) and will not alter its fabric. However, the proposed development may impact on the views to and from the SHR item, particularly following the proposed amendment to SEPP (State Significant Precincts) that removes the height restrictions on proposed development at Frasers Town Centre which would permit a building height of up to 67.4m (as shown in Illustrative Design Scheme). It is recommended that appropriate care should be taken not to adversely impact the SHR item above during construction works associated with the proposed redevelopment of the precinct.</p>	
<p>The proposed modification which would permit a building height of up to 67.4m (as shown in Illustrative Design Scheme) may also impact on views from several State Heritage Items: Denham Court (SHR 00212); Horningsea Park (SHR 00255); Glenfield Farm (SHR 00025); Macquarie Fields House (SHR 00424); Varroville (SHR 00737) and Robin Hood Farm (SHR 01387). These State Heritage items are located beyond the immediate boundaries of the development at Frasers Town Centre and appropriate care should be taken not to adversely impact these items.</p>	<p>Noted. Any impacts on local items near the Town Centre will be considered where appropriate as part of the SHI's to support the DAs for the detailed buildings.</p>
<p>It is noted that at the time of the original Concept Plan the heritage listed 'Ingleburn Village site' – three Riley Newsum Prefabricated cottages were located within the Frasers Town Centre. These buildings were approved to be demolished by Liverpool Council under DA595/2014. The buildings were demolished in accordance with their development consent by UGNSW.</p>	<p>Noted.</p>
<p>If any archaeological relics are uncovered during the course of the construction, all work shall immediately cease in that area and a written assessment of the nature and significance of the resource, along with a proposal for the treatment of the remains, shall be submitted to the Heritage Division. Depending on the results of the assessment, an excavation permit may be required under the NSW Heritage Act, 1977 before construction can continue in that area.</p>	<p>Noted.</p>
Endeavour Energy	
<p>1. Endeavour Energy has processed an enquiry for the Town Centre comprising of 858 town houses, 551 apartments and 36,000m² of retail space with an estimated load of 9MVA and requiring two 11kV feeders from Edmondson Park Zone Substation by the developer.</p>	<p>Further consultation has been undertaken with Endeavour Energy who have agreed the appropriate time to re-assess the load requirements is when the supply application is lodged (see Attachment I).</p>
<p>2. The proposed changes are not clear on the total number of dwellings, nor is there any discrimination on the type of dwellings and it is unclear if the 145,025m² gross floor area is retail and commercial only or inclusive of residential. If gross floor area excludes residential meaning it is exclusively retail and commercial, the estimated load for this alone is 14.5MVA. Adding a further 7MVA for 1,884 mixed type dwellings will result in a total Town Centre load of 21.5MVA. Factoring in diversity between commercial and residential this drops to 18.3MVA. This is double the requirement of the current developer enquiry mentioned in item 1.</p>	<p>Further consultation has been undertaken with Endeavour Energy who have agreed the appropriate time to re-assess the load requirements is when the supply application is lodged (see Attachment I).</p>
<p>3. Endeavour Energy established the Edmondson Park Zone Substation with a maximum capacity of</p>	<p>Noted.</p>

35MVA based on Planning information provided when Edmondson Park was gazetted and released.	
4. To enable proper analysis of the capacity available for the Edmondson Park Town Centre, Endeavour Energy requires detailed information including breakdown of dwelling types and numbers separate to retail and commercial floor space. Advice should include maps of the Town Centre showing the proposed layout and a staging plan if known. A new assessment would be needed to determine if sufficient capacity will be available for the increases proposed.	Further consultation has been undertaken with Endeavour Energy who have agreed the appropriate time to re-assess the load requirements is when the supply application is lodged (see Attachment I).
5. The Town Centre is likely to need four 11kV feeders to deliver the increased capacity of 18MVA from the zone substation in lieu of the previously recommended two feeders for 9MVA.	Noted.
6. Based on a scenario that item 2 is a correct assessment of the proposed changes, the Edmondson Park Zone Substation may be able to meet capacity requirements with a 95% utilisation.	Noted.
7. Final assessment is reliant upon advice being sort as per item 4.	Noted.
8. The Edmondson Park Zone Substation will not have full security of supply until 2018 when 33kV transmission feeder work reliant on the completion of Croatia Ave and Campbelltown Road is completed.	Noted.
Water NSW	
Water NSW has raises no objections.	Noted.
Camden Council	
Edmondson Park Town Centre is located approximately 5km east of the Leppington Major Centre, which is identified as a Strategic Centre in A Plan for Growing Sydney. Leppington currently allows for maximum building heights of up to 24m and a range of land uses including commercial, retail and residential. The proposed Concept Plan modification does not demonstrate that any consideration has been given to the local centres hierarchy, or the impacts that the significant increase in building heights in this location will have on the legibility of centres in the South West Growth Centre. The Greater Sydney Commission is currently undertaking the District Planning process, of which Leppington and its role as a Strategic Centre will likely be a key consideration. Council officers consider that such a significant review of the current planning controls for Edmondson Park, particularly with regard to the proposed building heights, should be considered via the District Planning process, with due regard for the potential impact on surrounding centres.	Whilst height does influence the visual legibility of centres, increasing the height of the landmark building at Edmondson Park will not have any material impact on the local centres hierarchy in the South West Growth Centre. Specifically, under A Plan for Grown Sydney, Strategic Centres are identified for their role in providing employment. The Modification does not seek to amend that amount of retail / commercial space located within Edmondson Park, and therefore maintains Edmondson Park's current role in the local centres hierarchy. Further, the Approved Concept Plan provided for a landmark building up to 30m, above the maximum height currently provided for in Leppington. The heights in the town centre will remain largely around 24m, consistent with Leppington, with some variations in form and the larger landmark building.

<p>Council officers acknowledge that, in principle, replacing the current FSR and building height controls with a maximum gross floor area achieves the same outcome with regard to restricting the overall building mass and height across the site. However, concern is raised that removing all controls from the SEPP and purely relying on the Concept Plan does not provide adequate protections should a future proponent wish to develop the site not in accordance with the Concept Plan.</p> <p>Schedule 3 of the SEPP currently identifies maximum gross floor areas for development in other State Significant Precincts. Council officers recommend that a similar approach be adopted with the current proposal to ensure that the proposed vision for the site, as reflected in the proposed controls, is realised regardless of the ultimate developer.</p>	<p>As detailed above, moving the controls to the Concept Plan provides greater certainty than the SEPP as under clause 3B of Schedule 6A Transitional arrangements – repeal of Part 3A in the EP&A Act, it states that:</p> <p><i>(d) a consent authority must not grant consent under Part 4 for the development unless it is satisfied that the development is generally consistent with the terms of the approval of the concept plan,</i></p> <p>Therefore under the EP&A Act the consent authority must not grant consent for development application, subject to a Part 3A Approval, unless it is satisfied that the development is generally consistent with the terms of the approval, which in this case includes a specific maximum GFA and height.</p>
Campbelltown Council	
<p>The proposal's increase in dwellings and commercial floor space will lead to an increase in traffic on local and arterial roads, in particular, Campbelltown Road, which would be serviced by a number of signalised intersections in the vicinity of the release area.</p> <p>Council requests that a copy of the VISSIM model be made available for review if possible and is interested to find out more about the RMS comments on the proposal and its potential impacts on Campbelltown Road, with particular reference to service levels at intersections – which are shown in the application to reduce to Levels C and D as a result of the development.</p>	<p>Revised traffic modelling is provided at Attachment K.</p>
<p>Aside from these traffic matters, the Council does not raise any objection to the proposed modification.</p>	<p>Noted.</p>
Environmental Protection Authority	
<p><u>Land use conflict</u></p> <p>The proposed amendments aim to deliver a mixed use development comprising of residential and commercial use that involves increasing the maximum building height and floor space ratio to increase residential densities. With the proposal involving integration of both residential and commercial uses and increases in residential densities, it is important that adequate planning controls are in place to manage any potential noise and air related environmental issues in order to prevent land use conflict. For example, commercial activities can produce a range of noise related impacts including mechanical ventilation, refrigeration, hotel/live music event noise, sirens and for shopping centres, night-time cleaning/blowers/truck movements. The EPA considers that appropriate land use planning should ensure land use conflict is avoided. For example, new developments should be planned to avoid noise-related land use conflicts up front through measures including spatial separation, best practice building design, siting and construction, and the use of appropriate air and noise mitigation techniques. In the absence of such approaches, the potential to address noise and odour issues retrospectively following development can be challenging and expensive and can lead to community complaint.</p>	<p>The Modification seeks approval for a mixed-use town centre. Management of the potential impacts between the commercial and residential uses in the Town Centre Core will occur as part of the detailed design for those uses.</p> <p>The Modification does integrate spatial separation within the design of the public domain and land use planning to mitigate the impacts of the rail and road corridors.</p>
<p><u>Road and Rail Traffic Noise</u></p>	<p>The Approved Concept Plan and Modification provided residential land uses near Campbelltown Road and Rail Corridor. A response to the</p>

The supporting information does not appear to include any consideration of any potential road and rail traffic noise impacts and proposed mitigation strategies associated with the proposed amendments. In particular the amendments apply to land adjacent to the south west rail link and associated new Edmondson Park Rail Station. Residential development next to busy roads and rail corridors is required to meet the internal noise goals in the Infrastructure SEPP 2007. For example, the Infrastructure SEPP 2007 states that where proposed residential development is in close proximity to busy roads (with an annual traffic volume of over 40,000 vehicles per day) and rail corridors, the following internal noise goals should be met: The LAeq levels must not exceed: (a) in any bedroom in the building-35 dB(A) at any time between 10.00 pm and 7.00 am (b) anywhere else in the building (other than a garage, kitchen, bathroom or hallway)-40 dB(A) at anytime. The Planning Proposal does include an assessment of the proposal against this SEPP. The EPA recommends that DPE clarify whether the above provisions apply and if they do, ensure the planning controls are appropriately noted to provide guidance for any future developer. In addition, the Development Near Rail Corridors and Busy Roads—Interim Guideline should also be consulted. This guideline includes goals for internal noise levels based on World Health Organisation guidelines for residential and other sensitive developments along busy road to protect health and amenity. This guideline recognises judicious land use planning, architectural design, building orientation and good internal layout that can achieve acceptable acoustic amenity and minimise exposure to poor air quality in close proximity to busy transport corridors. With the amendment involving an increase in residential densities, the proposal will also be a major traffic generating development. In this regard, the impacts from road traffic noise need to be assessed to determine whether noise mitigation measures are required in order to satisfy the NSW Road Noise Policy (DECCW 2011). As indicated in the Development Near Rail Corridors and Busy Roads—Interim Guideline, when considering renewal of areas or the subdivision of land located near busy roads, potential noise and vibration impacts should be considered at the master planning/concept planning stage. At this stage, there is more opportunity to address noise and vibration through setbacks, building orientation, layout, building height controls or noise barriers.

It is important that a process is in place to ensure specific noise requirements in the Infrastructure SEPP 2007 and Development Near Rail Corridors and Busy Roads—Interim Guideline have been satisfied. This process could include detailed acoustic design input into the Subdivision Plans, Construction Certificate Plans and Specifications. A provision that validates achievement of the noise criteria should also be included. Validation should be undertaken prior to the issue of an Occupation Certificate to ensure any acoustic design measures have been satisfactorily incorporated into the development as a further check and balance. Further information on the range of noise mitigation strategies that are available is provided in Section

EPA's comments in relation to Acoustics is provided at **Attachment G**. They note that the site has been previously conditioned under the Concept Plan to require the issues to be addressed in accordance with the requirements of the Infrastructure SEPP 2007. Accordingly, future development will be assessed to address these issues, at DA stage, and will be accompanied by an Acoustic report to address the issues raised by the EPA.

<p>3.1 of the Noise Guide for Local Government (EPA 2013) (http://www.epa.nsw.gov.au/noise/nglg.htm) and Section 3 of Development Near Rail Corridors and Busy Roads—Interim Guideline (Department of Planning 2008). In addition, the NSW Road Noise Policy (DECCW 2011) provides information and assessment requirements in relation to traffic generating development that should also be referred to in the Development Control Plan (DCP).</p>	
<p><u>Water Quality</u> Water strategies for the development have been developed based on generic per cent load reductions that have no reference to receiving water outcomes that support the NSW Water Quality Objectives (WQO). The use of these generic targets does not reflect contemporary Water Sensitive Urban Design (WSUD) performance and may not deliver improvements in the health of waterways. The EPA recommended that appropriate water quality targets be developed that support the NSW WQOs and determine whether proposed mitigation measures including WSUD are adequate.</p>	<p>JWP has prepared a detailed response to this matter which is included at Attachment H.</p>
<p><u>Wastewater</u> Information should be provided on whether the existing sewage reticulation system can cater for any new additional load. Information should also be provided on whether any additional load will impact the systems environmental performance especially in relation to sewage overflows from any existing sewage pumping stations and discharges from any associated Sewage Treatment Plant. The EPA's policy is that for new systems there should be no pollution of waters as a result of overflows during dry weather and that overflows during wet weather should be minimised. Sewage overflows have been identified as one of the major contributors to diffuse source water pollution in urban environments.</p>	<p>See Sydney Water submission and response below.</p>
<p><u>Waste Management</u> The EPA has developed information to improve waste management associated with new residential development. In this regard, Council should consult the Waste Not Development Control Plan Guideline (EPA 2008) to determine whether the waste provisions in the DCP are contemporary and adequate in relation to the proposed amendment. This guideline provides suggested planning approaches and conditions for planning authorities to consider at the development application phase in relation to waste minimisation and resource recovery. This includes consideration of demolition and construction waste and the provision of facilities and services to allow the ongoing separation, storage and removal of waste and recyclables.</p>	<p>Noted. Frasers will consider the Guideline as part of the detailed design process during the DA stage.</p>
<p>Rural Fire Service</p>	
<p>The modification however appears to include a Bushfire Asset Protection Zones (APZ) Plan which details smaller APZs than those identified in the Bushfire Planning Assessment approved as part of the original concept plan (McKinlay Morgan & Associates Pty Ltd, 91275/2, August 2010). The Bushfire Protection Assessment submitted in support of the modification (EcoLogical, 15SUT_3123, 4 March 2016) does not acknowledge the original Bushfire Planning Assessment and does not set out why different bushfire protection measures are now proposed. Furthermore, the APZs shown in Bushfire</p>	<p>A detailed response to the RFS' matters has been provided by Ecological at Attachment F.</p>

Asset Protection Zones Plan extend beyond the area covered by the assessment included with the modification. On this basis, while the New South Wales Rural Fire Service has no objection to the general nature of the modifications proposed to the concept plan, it is recommended that the Bushfire Asset Protection Zones (APZ) Plan included in the modification request should not be approved until the above matters are addressed.

Sydney Water

Water

- The current drinking water system supplying the area has sufficient capacity to service the proposed development.
- Local watermain amplifications will be required to service the proposed development.
- Detail requirements will be provided at the Section 73 Phase.

Noted.

Wastewater

- The additional proposed dwellings overload the existing network.
- Sydney Water is now aware of this proposal and will conduct detailed wastewater modelling at the Section 73 stage.
- The developer should submit a scheme plan of the proposed development and Sydney Water shall review the plan before approving. The subsequent design will comply leak-tight sewer requirements and final approval is subject to the compliance with approved servicing strategy.
- The proposed wastewater infrastructure for this development will be sized & configured according to the Sewerage Code of Australia WSA 02-2002-2.2 (Sydney Water Edition 1 - Version 3)

Noted. This advice relating the overload of the existing network is inconsistent with the previous advice provided by Sydney Water (see page 7 of the feasibility letter from Sydney Water dated the 19 Feb 2016 at **Attachment H**). Frasers will continue to work with Sydney Water in relation to clarifying the wastewater capacity and ensure as part of the detailed infrastructure DAs that sufficient infrastructure is in place to support the development.

Recycled Water

- The current recycled water system has sufficient capacity to service the proposed development.
- Recycled water main amplifications will be required to service the proposed development.
- Detail requirements will be provided at the Section 73 Phase.

Noted.

Public Submissions

Impact to local infrastructure and facilities

There is concern that the proposal will increase densities beyond the capacity of local infrastructure such as roads, schools, parking, open space.

A detailed response to Council's comments in relation to these specific items is provided above.

Questions have been raised if additional facilities will be provided to cater to the increased populations.

The development will provide or contribute to additional infrastructure as appropriate for the demand generated by the development.

Overshadowing

There is concern that the town centre will overshadow local property.

The shadow diagrams included with the Concept Plan illustrate there will be no additional shadow on the residential areas outside of the Town Centre.

Increased Densities

There is concern the proposal is an overdevelopment of the site with associated impact on traffic and noise.

Detailed traffic modelling was undertaken as part of the Modification and identifies where infrastructure upgrades are required. The Town Centre will be a Transit Orientated Development that seeks to reduce car dependency by locating density and retail near public transport infrastructure. Noise associated with the development is unlikely to impact on the surrounding residential uses and will be considered at the DA stage.

There is a perception that the proposal is inconsistent with the character of the local area and

The existing character of the area was approved to change as part of the Concept Plan. There was always intended to be a town centre in this

the proposal should not be allowed to increase heights and dwellings.	location with greater heights and density than what is currently on the site or being developed in the areas around the Town Centre.
There is a perception that the provision of apartment buildings will come at the expense of a larger retail precinct.	The retail proposed within the Frasers Town Centre is consistent with that approved under the Concept Plan.
Traffic Impacts	
There are concerns the proposal will cause traffic congestion and will negatively impact parking.	The Modification was supported by a Traffic Study including microsimulation modelling which demonstrates that the Modification will not result in any adverse traffic or parking impacts.
Noise Impacts	
There is a perception that the proposal will increase noise impacts.	The proposed Modification will not result in any additional acoustic impacts beyond those already considered in the Concept Plan. Any potential acoustic impacts as a result of the individual developments within the Frasers Town Centre will be considered as part of DA process.
Architectural Design	
The landmark building should be required to have iconic value and be of interesting design.	Noted. Frasers intends to provide an iconic landmark building.
Road Layout	
There is a perception that the revised road layout will reduce permeability and increase congestion as a result of removing two intersections on Campbelltown Road.	The intersection that are proposed to be removed from Campbelltown Road were left in left out and therefore never provided permeability. The proposed layout has been determined following microsimulation modelling in order to determine the best traffic outcome.
Car Parking	
There is perception that the proposal will reduce the amount of parking available for commuters who use Edmondson Park railway station.	<p>The commuter car park is outside of the Frasers site and its capacity is the responsibility of Transport for NSW.</p> <p>The proposed Modification seeks to provide a Transit Orientated Development which redistributes density in the Town Centre closest to the Station, and establishes a public domain framework that will create walkable pedestrian friendly neighbourhoods that encourage people inside and from outside the town centre to walk rather than drive.</p> <p>On the above basis, the dwellings inside the Town Centre are very unlikely to impact on the capacity of the commuter car park and the provision of the town centre and improved pedestrian connectivity to the south could in fact reduce the demand on the commuter car park.</p> <p>It is likely that Frasers will need to introduce time limited parking within the basement retail car park and work with Council regarding setting up a management framework for the on-street car parking in the Town Centre to manage commuters using those parking spaces.</p> <p>Frasers would support Transport for NSW investigating provision of additional commuter car parking on the existing commuter car park site to address the concerns regarding its capacity, but notes that it is not Frasers responsibility to provide commuter car parking, nor is the Frasers development likely to contribute to its demand.</p>
There is concern the proposed car park rate cap will increase car parking constraints in the local area.	The proposed rates have been determined to achieve a balance between providing appropriate parking provision for residents whilst not encouraging car use.
Design Guidelines	
There is a perception that the Design Guidelines does not address community issues and seeks to circumvent compliance with Edmondson Park DCP and Liverpool DCP.	See response to Council's concerns above.
There is concern the Design Guidelines will lead to inconsistent built form outcomes across the suburb.	The Design Guidelines only apply to the Frasers Town Centre. By virtue of it being a town centre it is intended to have a different built form outcome to that in the areas of Edmondson Park zoned for low density housing.
There is a perception that the design guidelines do not provide enough detailed planning controls and guidelines leading to less stringent assessment compared to the existing process.	The Design Guidelines are a site specific planning framework that works in conjunction with the Concept Plan to provide more detailed site specific controls than exist for other centres in the Liverpool or surrounding LGAs.

Change to GFA control	
There is a perception that the maximum GFA limit will reduce the size of the retail core which will limit the provision of retail/commercial facilities and services	The retail proposed within the Frasers Town Centre is consistent with that approved under the Concept Plan.
There is a perception that the GFA would not be accounted for across the site and that the existing FSR should remain.	An assessment of the cumulative GFA within the town centre will be provided to Council with each DA to assist it with undertaking its role of determining if development is generally consistent with the terms of the Concept Approval.
Studio Dwellings	
There is concern the inclusion of 'studio dwellings' as a nominated permissible use in the B4 Mixed Use zone is inconsistent with the zone and intended objective of the existing zone.	Studio dwellings are permissible in the B4 zone in the other Growth Centre precincts under the Growth Centres SEPP. Attached dwellings are currently permissible in the zone. Studio Dwellings are a complementary type of residential use that collocate with attached dwellings and are therefore also appropriate in the zone.