ETHOS URBAN

Our Ref: 15895
Department Ref: MP10_0118

8 December 2017

Carolyn McNally Secretary Frasers Property Australia 321 Pitt Street, Sydney NSW 2000

Dear Ms McNally,

Environmental Assessment Report - Frasers Town Centre, Edmondson Park Section 75W (Modification 6) to MP 10_0118 Edmondson Park South Concept Plan

This Environmental Assessment Report (EAR) has been prepared to modify the approved Edmondson Park South Concept Plan (MP 10_0118) as it currently applies to the southern part of the Edmondson Park Town Centre being developed by Frasers Property Australia (referred to herein as the Frasers Town Centre).

This application seeks to redistribute GFA within the Town Centre Core to reflect the further design development that has occurred since the original indicative scheme was developed. It will not result in any increase in the total GFA, height or number of dwellings for the Frasers Town Centre.

This EAR has been prepared by Ethos Urban, for Frasers Property Australia (Frasers). This EAR describes the site, its environs and the proposed Concept Plan (Mod 6) and includes an assessment of the proposal in accordance with the relevant Director General's Environmental Assessment Requirements (DGRs) issued for the original Concept Plan pursuant to Part 3A of the EP&A Act.

The Modification should be read in conjunction with the Concept Plan Instrument of Approval MP 10_0118 and the Environmental Assessment Reports prepared by JBA (dated March 2010 and March 2016).

1.0 Background

1.1 Approved Concept Plan

In March 2010 Landcom (now UrbanGrowth NSW) lodged a Concept Plan (MP 10_0118) and concurrent Project Application (MP 10_0119) for the development of Edmondson Park South. The Concept Plan was approved by the Planning Assessment Commission (PAC) on 18 August 2011 and provides for a development on approximately 413 hectares of land, including provision of a new town centre adjacent to Edmondson Park Station.

In March 2016 Frasers lodged a Section 75W Modification to the Concept Plan (Concept Plan (Mod 4) to incorporate the winning concepts of a bid process undertaken by Urban Growth, including a number of consequential and related changes to the built form and public domain outcome for the site. Concept Plan (Mod 4) was approved on 12 October 2017.

Urban Growth has requested the Secretary's Environmental Assessment Requirements for a further Modification (Mod 5) in relation to land to the north of the Frasers Town Centre which are not relevant to this Modification.

To facilitate the redevelopment of the Edmondson Park site under the Concept Plan, the site was listed in Part 31 of Schedule 3 of the Major Development SEPP. The Major Development SEPP zones the Edmondson Park site whilst providing maximum building height, FSR and minimum lot size development standards. The listing also includes a

range of miscellaneous provisions, including heritage listings and the requirement to prepare a Development Control Plan to guide the future redevelopment of the Edmondson Park site.

1.2 Other Frasers Town Centre Applications

Frasers has lodged a number of DAs with Liverpool City Council for the delivery of the Frasers Town Centre, including the first stage of the Town Centre Core, which includes the development of the North East and South East Quadrants.

The DA has been lodged in accordance with Section 83B of the EP&A Act, and includes the detailed retail, commercial and residential development for each quadrant, but also makes provision for an envelope within the South East Quadrant that is capable of accommodating a hotel building. The GFA proposed in the North East and South East Quadrants is 41,532m² and 23,083m² respectively and complies with the Concept Plan (as modified). However, it is the intention to lodge a further DA for the detailed hotel component within the proposed envelope which will utilise the GFA that this Modification seeks to redistribute from the North East Quadrant to the South East Quadrant.

The DA drawings are included at **Attachment A** for information purposes.

2.0 Description of the Proposed Modification

As part of Concept Plan (Mod 4), Frasers prepared an indicative concept for the Town Centre Core, and provided the GFAs for each quadrant which reflected the indicative development at that time. Condition 1.3A of the Concept Plan Instrument of Approval specifically approves the GFA within the Town Centre Core on a quadrant basis using the indicative GFAs that were provided.

During the design development phase that has occurred following lodgement of Concept Plan (Mod 4), Frasers made a range of changes to the specific uses and mix across the quadrants, including provision of a hotel and relocating the Cinema (and its GFA) from the North East Quadrant to the South East Quadrant of the Town Centre Core.

The GFA in the cinema combined with the other development within the quadrant exceeds the 10% flexibility provided under condition 1.3A. Accordingly, it is requested that the base numbers in Condition 1.3A of the Instrument of Approval be amended as set out in the table below in order to accommodate the known shift in the location of the Cinema within the Town Centre.

North West	20,000
North East	41,500 (down 3,500)
South West	55,500 (down 1,000)
South East	28,025 (up 4,500)
Total	145,025 (same)

The amended version of Condition 1.3A would be as follows:

1.3A Future development applications within the Frasers Town Centre Core are not to exceed the GFA and building heights specified in the table below:

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TCC Quadrant	Gross Floor Area (m ²)	Maximum height (RL)	
North West	20,000	99.5	
North East	4 5,000 41,500	105.8	
South West	56,500 55,500	95.7	
South East	23,525 28,025	96.4	
Total	145,025		

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- b) Notwithstanding the GFA figures in a) above, GFA in any quadrant may exceed the maximum by up to 10 percent, provided the total GFA for all quadrants is not exceeded; and
- c) Notwithstanding the maximum height figures in a) above, only one single 'landmark' building may be approved in the South West quadrant to a height of RL 132.9.

It is noted that no modifications are proposed to the maximum GFA, heights, number of dwellings, Edmondson Park Town Centre Design Guidelines, or Statement of Commitments.

3.0 Assessment of Planning Issues

This section of the report assesses and responds to the environmental impacts of the Concept Plan (Mod 6) proposal. It addresses the matters for consideration set out in the Director-General's Environmental Assessment Requirements (DGRs), and compliance with the approved Concept Plan (as modified).

3.1 Relevant Planning Legislation and Policies

The Concept Plan's consistency with the relevant legislation, environmental planning instruments, policies and guidelines was considered as part of the original EAR. The proposed Modification does not change the original assessment against polices.

It is noted that the State Significant Precincts SEPP is still in the process of being amended to reflect the changes approved as part of Concept Plan (Mod 4). It is understood that the final SEPP amendment will have a maximum GFA for the Town Centre Core and therefore the redistribution of GFA between quadrants will have no impact on the proposal's consistency with the SEPP.

3.2 Built Form and Urban Design

The originally approved Concept Plan has a maximum FSR of 2.5:1 across the Town Centre Core. As part of Concept Plan (Mod 4) this FSR was converted to a maximum GFA for the Town Centre Core to provide additional flexibility in the delivery of uses within the Town Centre. The EAR that accompanied Concept Plan (Mod 4) set out GFAs for each quadrant which reflected the indicative scheme, and were not linked with a specific built form or urban design purpose. Table 2 in the Concept Plan (Mod 4) Section 75W EAR (reproduced below) illustrates that the South East Quadrant under provided 11,201m² of GFA and the North East Quadrant had over provided 4,888m² against the base FSR of 2.5:1.

Table 2 - Approved and proposed Gross Floor Area by Quadrant

Town Centre Core Quadrant	Site Area	Current GFA (as an expression of FSR)	Proposed Maximum GFA*	Difference
North West Quadrant	9,564.37	23,910m²	20,000m²	-3,910 m²
North East Quadrant	16,045.59	40,113.9m²	45,000m²	+ 4,886.1m²
South West Quadrant	18,509.16	46,272.9m²	56,500m²	+ 10,227.1m ²
South East Quadrant	13.890.72	34,726.8m²	23,525m²	-11,201.8m²
Total	58,0010 m ²	145,025m ²	145,025m ²	0m ²

^{*}Up to 10% of the maximum GFA can be moved from one quadrant to another

Redistributing 4,500m² back into the South East Quadrant from the North East Quadrant and South West Quadrant, which were over provided with by 4,886m² and 10,227m² respectively, in Concept Plan (Mod 4), will:

remain within the maximum GFA approved for the Town Centre Core;

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- not result in an additional bulk and scale that is beyond what has already been assessed; and
- equate to a more even FSR distribution across the Town Centre Core, which is likely to produce a better built form outcome.

No changes are proposed to the endorsed Edmondson Park Design Guidelines which will continue to ensure a high quality design outcome will be achieved within the Town Centre as part of the detailed design stage.

4.0 Conclusion

This application seeks to redistribute GFA within the Town Centre Core to reflect the further design development that has occurred since the original indicative scheme was developed. It will not result in any increase in the total GFA, height or number of dwellings for the Frasers Town Centre.

The redistribution does not change the findings of the environmental assessment undertaken for Concept Plan (Mod 4) and will result in a more even distribution of GFA across the Town Centre Core.

In light of the merits of the proposal and in the absence of any significant adverse environmental, social or economic impacts, we recommend that the Modification be approved.

Yours sincerely,

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