

21 March 2019

Our Ref: 218133
Department Ref: MP_10_0118

Ms Carolyn McNally
Secretary
Department of Planning and Environment
320 Pitt St,
Sydney NSW 2170

Dear Carolyn

Section 75W Modification Application to MP_10_0118 Edmondson Park South Concept Plan Mod 8

This Environmental Assessment Report (EAR) is submitted to the Department of Planning and Environment in support of a Section 75W modification to Concept Plan Approval MP10_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) pursuant to clause 3C, Schedule 2 of Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017 (Savings and Transitional Regulation).

The modification seeks to make amendments to the Frasers Town Centre Design Guidelines (FTCDG) that apply to the Frasers Town Centre to reduce the car parking rate for 2-bedroom dwellings in the Town Centre Core.

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 (now Ethos Urban) (dated March 2010 and March 2016) and the following attachments:

- Amended Frasers Town Centre Design Guidelines prepared by Ethos Urban (**Appendix A**); and
- Parking Advice Statement prepared by Ason Group (**Appendix B**).

1.0 Background

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 (now State Significant Precinct SEPP). The State Significant Precinct SEPP zones the Edmondson Park site whilst providing maximum building height, FSR and minimum lot size development standards.

In March 2010 Landcom (now Urban Growth 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. Design Guidelines that support and guide development of the Frasers Town Centre were also approved as part of Mod 4.

A S75W modification (Mod 5) has been submitted by Urban Growth in relation to land to the north of the Frasers Town Centre which are not relevant to this Modification. Mod 5 is currently under assessment by the Department.

On 6 March 2018 a S75W modification to MP_10_0118 (Mod 6) was approved by the Minister for Planning on 6 March 2018 for the reallocation of Gross Floor Area within the Frasers Town Centre. Mod 6 is not relevant to this Modification.

Frasers has requested the Secretary's Environmental Assessment Requirements for a further Modification (Mod 7) to include a high school in the Edmondson Park Town Centre. Mod 7 is not relevant to this Modification.

Concurrent Modification

A separate S75W Modification has been concurrently submitted to the Department related to changes to the Design Guidelines regarding dwelling widths of Townhomes in the Residential Precinct (Mod 9). The two changes to the Design Guidelines relate to separate aspects of the Frasers Town Centre, being the Town Centre Precinct and Residential Precinct. This modification relates to the Town Centre Core which is being developed under a separate program to the development of the Residential Precinct.

Each Precinct is working under separate Development Approvals and are at different stages of planning. The Mod 8 car parking rate has an impact to the design planning and feasibility for the Town Centre West and is required to be resolved urgently. Accordingly, there is a need to resolve the two modifications independently of each other to avoid delay. Accordingly, two separate modification applications are proposed.

2.0 Consent proposed to be modified

Concept Plan (MP_10_0118) (Mod 4) was approved by the Planning Assessment Commission on 12 October 2017 related to:

- *introduce a maximum gross floor area limit of 145,025m² for the Town Centre Core*
- *increase the maximum building height in the Town Centre Core from 30 m to 67.4m*
- *increase the approximate number of dwellings within the Town Centre Core from 912 to 1884*
- *introduce maximum car parking rates and change the road network*
- ***introduce new design guidelines and a public domain plan (our emphasis)***

This S75W modification is the eighth modification (Mod 8) to the consent and seeks to make changes to the Design Guidelines that apply to the Frasers Town Centre (approved under Mod 4).

3.0 Proposed modifications to the consent

3.1 Modifications to the Frasers Town Centre Design Guidelines

3.1.1 Town Centre Core Car Parking Rates

The Town Centre Core is a mixed-use precinct that locates height and density close to the existing Edmondson Park Station in order to locate housing and jobs close to high frequency transport. The residential flat buildings in the Town Centre core have car parking rates that are outlined at Section 4.0 and Table 2 of the FTCDG, as follows:

Residential Flat Buildings

- *Studio and 1 Bedroom Dwellings* *1 Space*
- **2 Bedroom Dwellings** **1.2 Spaces**
- *3 Bedroom Dwellings* *2 Spaces*
- *Visitors* *1 Space per 10 Dwellings*

The above rates are neither a minimum or maximum and are to be provided generally in accordance with the rates. SEPP 65 and the Apartment Design criteria under Objective 3J-1 of the ADG states:

For development in the following locations:

- *on sites that are within 800 metres of a railway station or light rail stop in the Sydney Metropolitan Area; or*
- *on land zoned, and sites within 400 metres of land zoned, B3 Commercial Core, B4 Mixed Use or equivalent in a nominated regional centre*

the minimum car parking requirement for residents and visitors is set out in the Guide to Traffic Generating Developments, or the car parking requirement prescribed by the relevant council, whichever is less

The car parking needs for a development must be provided off street

The Roads and Maritime Services (RMS) Guide to Traffic Generating Development recommend minimum car park rates for Metropolitan Sub-Regional Centres, as follows:

- *0.6 spaces per 1-bedroom unit.*
- **0.9 spaces per 2-bedroom unit.**
- *1.40 spaces per 3-bedroom unit.*
- *1 space per 5 units (visitor parking).*

This modification seeks to amend the FTCDG car parking rate for 2-bedroom dwellings from 1.2 spaces down to 1 space, to better align with the recommended Guide to Traffic Generating Development parking rates (See **Appendix A** and Statement prepared by Ason Group (**Appendix B**)).

3.2 Modifications to conditions

The proposed modifications described will necessitate an amendment to Part A (c) Condition 1.1 to reflect this modification application.

4.0 Substantially the same development

Pursuant to clause 3C(1) of Schedule 2 of the Savings and Transition Regulation, Section 75W continues to apply to the modification of a Concept Plan approved before or after the repeal of Part 3A. However clause 3BA(5) limits the powers under Section 75W to only if the Minister is satisfied that:

- (a) The proposed modification is to correct a minor error, misdescription or miscalculation, or
- (b) The proposed modification is of minimal environmental impact, or
- (c) The project to which the concept plan as modified relates is substantially the same as the project to which the concept plan currently relates (including any modifications previously made under section 75W).

The proposed modification to the Edmondson Park concept plan is substantially the same project as that of the approved concept plan (as modified) for the following reasons:

- The proposed modified development does not give rise to any new or different potential environmental impacts as compared to the approved development.
- The development will continue to provide car parking that is appropriate for a high-density development within 400m of a metropolitan railway station.
- The Frasers Town Centre remains a mixed-use development delivering 1884 dwellings, as approved.
- The changes only relate to the design guidelines and does not change the development concept.
- The environmental impacts of the proposed modifications remain substantially the same as that of the approved Concept Plan.

5.0 Environmental assessment

5.1 Car Parking

As outlined at Section 3.1.2, SEPP 65 and the ADG identifies appropriate car parking controls based on the locational attributes of a site. The Frasers Town Centre Core is B4 Mixed Use zoned land, within 400m of the Edmondson Park Station. Accordingly, the design criteria for Objective 3J-1 states that:

- *the minimum car parking requirement for residents and visitors is set out in the Guide to Traffic Generating Developments, or the car parking requirement prescribed by the relevant council, whichever is less*

Council's DCP does not apply to the Frasers Town Centre. Instead, the FTCDG is the guiding document for development control. The car parking rate for a 2-bedroom dwelling is 1.2 spaces per dwelling.

FTCDG Design Solution DS4.1 state:

- *Car parking is provided generally in accordance with the car parking rates in Table 2. Any variations to these rates should be supported by a parking assessment report.*

Whilst the FTCDG rates are neither a maximum or minimum, they recommend a higher allowance of parking for 2-bedroom dwellings than the RMS. The RMS Guide to Traffic Generating Development recommends high density residential flat buildings in a Metropolitan Sub-Regional Centre provide a minimum 0.9 spaces per 2-bedroom dwelling.

To better align with SEPP 65, the ADG and the RMS rate, this modification seeks to amend Table 2 of the FTCDG to reduce the 2-bedroom parking rate from 1.2 spaces to 1 space per dwelling. The amended FTCDG is provided at **Appendix A**.

Ason Group Traffic Engineers have reviewed the proposal (**Appendix B**) and confirm the reduced rate provides greater consistency with the RMS recommendation and State Policy which seeks to encourage non-car travel

modes, particularly in close proximity to reliable public transport. The Department Circular, *Car parking requirements in SEPP 65*, is attached at **Appendix B**.

In this regard, the site located immediately adjacent a Railway Station and the residential apartments form part of a mixed-use Town Centre that is an urban precinct that includes shopping, recreation and even school services within close (walking) distance. As such, the site features all the attributes to encourage a shift away from private transport use via reduced car parking rates.

On-street car parking controls will be implemented in the surrounding areas, as is common near most railway station and retail centres. These general parking controls limit the opportunity for latent resident parking demands to adversely impact the surrounding area.

6.0 Conclusion

The proposed modification seeks to make amendments to the FTCDG that apply to the Frasers Town Centre to reduce the car parking rate for 2-bedroom dwellings in the Town Centre Core.

In accordance with Clause 3BA(5) of Schedule 2 of the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017*, Council may modify the consent as:

- The proposed modification is of minimal environmental impact; and
- Is substantially the same development as development for which the consent was granted.

We trust that this information is sufficient to enable a prompt assessment of the proposed modification request.

Yours sincerely,



Chris McGillick
Senior Urbanist



Michael Rowe
Director