Edmondson Park Town Centre (Mod 8) Response to Submissions

Issue	Comments/Actions
Endeavour Energy	
Cover Letter – Whilst Endeavour Energy has not undertaken a detailed assessment of the Modification Request, the supporting documents do not appear to quantify the change in number of car parking spaces / area – plus potential reductions in access and manoeuvring areas. If the reduction in car parking spaces is taken into consideration for the total approved gross floor area for the site (and there is no corresponding reduction in the gross floor area across the site), there may be a reallocation / redistribution of the gross floor area across the site eg. Additional bedrooms if not an increase in the actual number of dwellings etc? Even if the car parking is not included in gross floor area, consideration is still required to be given to their energy use.	We confirm that the proposed modification does not result in any change to GFA including reduction or redistribution and car parking (including access to parking) does not contribute to Gross Floor Area of a development. No change to unit mix or dwelling numbers is proposed by this modification. Any changes to the detailed design of the Town Centre would be required to assess provision of energy supply as part of any relevant development application under Clause 34 of State Environmental Planning Policy (State Significant Precincts) 2005.
Cover Letter - Whilst Endeavour Energy appreciates the reduction of car parking is also intended to encourage alternative modes of transport to the private motor vehicle, increased traffic congestion and reduced availability of parking / access for service vehicles as a result of latent resident parking demands can be problematic. To ensure that supply electricity is available to the community, access to the electricity infrastructure may be required at any time. Restricted access to electricity infrastructure by maintenance workers causes delays in power restoration and may have severe consequences in the event of an emergency.	
Submission - Whilst the modifications do not increase the total approved gross floor area or number of dwellings for the Town Centre, the redistribution of the gross floor area across the site may impact on the method of supply to the affected quadrants. The applicant should consult with their Level 3 Accredited Service Provider's (ASP) on this matter.	
Endeavour Energy attachment	The attachment has been prepared to address MOD 6 and not the subject modification, MOD 8. Accordingly, the subject is not relevant to the application. It is re-stated that the proposal does not change the electricity demands for the quadrant. Any future change to built form that may affect electrical requirements would be assessed as part of a detailed DA in accordance with Clause 34 of State Environmental Planning Policy (State Significant Precincts) 2005.
Sydney Water	
We have reviewed the application and have determined that the this development does not required assessment by Sydney Water at this Stage.	Noted.

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Campbelltown Council – Comments will be provided when received by the Department expected around 10/5

I have reviewed the modification request and raise no concern as the proposal is consistent with the prevailing requirements of the ADG, RMS Guide for Traffic Generating Developments and the DP&E Technical Note.

Noted.

Liverpool Council - Comments will be provided when received by the Department expected around 10/5

The RMS guideline provides an example as to how to determine a minimum requirement and the figures derived from the guide may not be appropriate for a town centre development like Frasers Town Centre in Edmondson Park. This is due to the classification of the Edmondson Park town centre (it is not a sub-regional centre), its geographical location away from major activity centres, high levels of car-based destinations in the region more generally and an overall high prevalence of motor vehicle ownership in Edmondson Park, compared to those areas within the RMS guideline.

The Town Centre is experiencing a significant increase in residential development. Higher demand for public parking provision near the rail station is evident and the need for an increase in parking is acknowledged by Government. The reduction sought in car parking provision for residential development within the town centre has the potential to further increase demand for on-street parking. Evidence has not been provided to show that 2 bedroom households will not own more than one motor vehicle. Whilst Council promotes walkable centres and would like to see mode shift towards active and public transport, it must also ensure that current parking issues within the Edmondson Park Town centre are not unreasonable exacerbated.

Any modification to the car parking standards within the Town Centre needs to be evaluated in a broader planning context. The RMS guidelines mention that the parking requirements for dwelling houses can be varied between local government areas due to varying levels of public transport accessibility as well as geographic and socioeconomic factors.

An analysis of car ownership in the 2016 Census indicates 46% of households in the Greater Sydney area have access to two or more motor vehicles compared to 41% of households in 2011. Edmondson Park is a rapidly growing suburb with a high rate of residential development and car ownership. A significant portion of residents are still dependent on cars for travel to work and other destinations. According to the 2016 Census, 66.4% households own two or more cars in Edmondson Park South and Bardia. Similar is the case for the rest of the Edmondson Park area with more than 60% of households having two or more cars. It is suggested that reducing the parking requirements in the Town Centre Core precinct will therefore aggravate the current

It is important to note that Edmondson Park is being developed as a major activity centre that will provide regionally significant facilities and infrastructure currently not available in the locality. The mixed-use town centre will be a major centre offering mixed use commercial and retail immediately adjacent to a railway station. It is not appropriate to compare the future town centre to the current situiation.

Accordingly, Ason has provided an analysis of other centres that share characteristics similar to the future Frasers Town Centre at (**Appendix A**). The analysis has reviewed 2016 Census date for the following areas to forecast the parking demand of two (2) bedroom apartments within the future EPFTC.

- Rhodes
- Liverpool
- Cabramatta
- Fairfield

The analysis shows that in Edmondson Park, 100% of two-bedroom households own one vehicle.

All other centres have two bedroom households with approximately 80% only owning a single or less motor vehicles; the average number of motor vehicles owned by two (2) bedroom dwellings being approximately 1 motor vehicle per dwelling, which is consistent with the Proposal.

According to the 2016 Census, approximately 60% households in Edmondson Park own two or more cars. However, it should be noted that approximately 96% of households in Edmondson Park have three (3) or more bedrooms, which is not comparable to the proposed two (2) bedroom dwellings within the future EPFTC for which a change in parking rate is sought.

Having regard of the above, the proposed car parking rate of 1 space per dwelling for two (2) bedroom dwelling is considered satisfactory and consistent with the forecast parking demand.

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Issue	Comments/Actions
parking issues in the area and will create unnecessary pressure on on-street parking provisions within the Town Centre and its surrounding areas.	
A detailed parking demand assessment would be needed to determine any variation to the existing car parking standards. This study will need to identify characteristics such as dwelling occupancy rates and matters related to movement and travel. Council would suggest looking at similar medium density developments elsewhere in Western Sydney to determine the characteristics of typical households for the area. This will assist in determining the number of jobs which are likely to be accessible by public transport (and of those, how many have journey times competitive with private vehicle), as well as the number of vehicles likely to be owned by households. It is agreed that the area would benefit from higher public transport use and other	
alternative modes of travel to reduce the demand for private motor vehicles. This, however, does not reduce the need for an appropriate level of car parking provision for development within the Town Centre Core. Reducing the standard as proposed could have a long term effect on the functionality and amenity of the centre.	
Public Submissions	
Car Parking	
There is concern the proposed car park rate cap will increase car parking constraints in the local area.	As identified above, the 2016 Census data and analysis of other comparable mixed-use centres show that the average number of vehicles by two-bedroom dwellings is one vehicle. Accordingly, there will be sufficient parking provided on-site for future residents which means there will be no additional demand for on-street parking.
There is perception that the proposal will further reduce the amount of parking available for commuters who use Edmondson Park railway station.	
	Notwithstanding, 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.

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