

EDMONDSON PARK SOUTH RESPONSE TO SUBMISSIONS CONCEPT PLAN

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
	DEPARTMENT OF SUSTAINABILITY, ENVIRONMENT WATER, POPULATION, COMMUNITIES (letter dated October 2010)	
SEWPC 1	<i>State Environmental Planning Policy (Major Development) 2005</i> can be regarded as an applicable environmental planning instrument under the EPA Act for the purposes of it being within the scope of the class of actions in Schedule 3 (a) of the Conservation Agreement for which further approval under Part 9 of the EPBC Act is not required.	Noted.
SEWPC 2	DSEWPC understands there are no proposed changes to the open space areas and that other relevant changes are: <ul style="list-style-type: none"> ▪ an adjustment to the Regional Park boundary that results in the inclusion of 1,650m² of 'A' class CPW vegetation at the expense of 1,247m² of 'C' class CPW; ▪ small scale temporary disturbance of 1,100m² of 'A' class CPW that will be fully revegetated; and ▪ the remediation action plan to deal with contaminated sites will impact 1.4ha of 'A' class CPW that is young regrowth that will be fully revegetated. 	Noted.
SEWPC 3	DSEWPC accepts the conclusion of the EcoLogical Australia assessment report that the requirements of the EPBC Act Conservation Agreement are met or exceeded. However, as previously discussed, the above proposed border changes, if they proceed, will need to be reflected in an amendment to the Conservation Agreement pursuant to clauses 7(a), 9 and 12.	Noted. In accordance with Clause 7(a) and 12 of the Conservation Agreement, Landcom has written to the Minister for Planning and the Minister for Climate Change and the Environment seeking their support for an amendment to the Conservation Agreement and requesting that they seek the agreement of the Commonwealth Minister for Sustainability, Environment, Water, Population and Communities (refer to letter dated 19 November 2010 included at Appendix D).
	DEPARTMENT OF DEFENCE (letter dated 25 October 2010)	
DEFENCE 1	The Department of Defence owns land directly affected by the proposed development at the former Ingleburn Army Camp, Campbelltown Road. The Stage 1 development proposal affects Lot 2, DP1144667, Lot 1, DP831149, Lot 1, DP831148, Lot 3, DP246213 and Lot 3, DP83 1152, while the Concept Plan also includes the remaining lots which are Lot A, DP188121, Lot 1 and 2, DP 831 152 and Lot 1, DP801456.	Noted.

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DEFENCE 2	As you are aware, the Commonwealth is currently considering a request from the NSW Government, represented by Landcom, for a Priority Sale of the entire Ingleburn Defence site under the provisions of the Commonwealth Property Disposals Policy. A decision on the request is expected in the near future.	Noted.
DEFENCE 3	<p>Defence has reviewed aspects of the proposal for the listing as a State significant site, the concept plan and the proposed Stage 1 development and offers the following comments.</p> <p>Defence supports the proposed development as described in Stage 1 and the Concept Plan, subject to the matters described below, and has no objection to the proposal being listed at State significant development under the Major Development State Environmental Planning Policy 2005. The proposal will bring significant regional benefits for housing and conservation, enable development of the rest of the Defence site and act as a catalyst for development of the surrounding Edmondson Park Release Area.</p> <p>While the development of the Defence site is primarily a matter for consideration by a future owner, Defence is bound by provisions of the Environmental Protection and Biodiversity (EPBC) Act 1999 and decision of the Commonwealth Minister for the Environment in the disposal of the site.</p> <p>Under the provisions of the EPBC Act, Defence referred the proposed disposal of the Ingleburn site to the Commonwealth Minister for the Environment, Heritage and the Arts in July 2007 (EPBC 200713567).</p> <p>The Minister endorsed the sale on 11 May 2009 subject to conditions which require:</p> <ol style="list-style-type: none"> 1. The purchaser to conclude a Conservation Agreement with the Commonwealth to protect and conserve the biodiversity of the area. 2. The Conservation Agreement must include the retention and management of areas of Cumberland Plain Woodland. 3. The contract of sale must include a covenant that binds the purchaser to preserve and maintain the Military Heritage Precinct and Mont St Quentin Oval. 4. Defence to complete a condition report for the Kitchen Dining Hall Complex, the Nissen Hut and the prefabricated cottages prior to the sale. <p>Conditions 1, 2 and 4 have been met and Condition 3 will be met in the drafting of the contract of sale to the NSW Government.</p>	Noted.

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DEFENCE 4	<p>Conditions 1 and 2 are met by the Conservation Agreement between the Commonwealth and NSW State Governments signed in late 2009. [A Conservation Agreement relating to the Edmondson Park Precinct was signed by the Commonwealth Minister for the Environment, Heritage and the Arts, NSW Minister for Climate Change and the Environment and NSW Minister for Planning under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999.1</p> <p>The Conservation Agreement identifies the areas of biodiversity that are to be protected on the Defence site and states how they will be managed for conservation purposes. The areas of conservation identified in the Agreement are slightly different to those that were zoned for conservation in the Liverpool and Campbelltown Local Environmental Plans (LEPs).</p> <p>The Concept Plan exhibited as part of the Landcom proposal reflects the requirements of the Conservation Agreement including the additional areas of open space required under the Agreement. It is important that future amendments and approvals for the concept plan continue to reflect the requirements of the Conservation Agreement for the Edmondson Park area.</p>	Noted and agreed.
DEFENCE 5	<p>The contract of sale for the Ingleburn site will include provisions requiring the purchaser to preserve and maintain the Military Heritage Precinct and Mont St Quentin Oval. The Concept Plan exhibited as part of the Landcom proposal reflects the requirements of the Commonwealth Minister's decision to preserve these heritage items. Prior to the disposal of the site, Defence intends to nominate these items for listing on the NSW Heritage Register.</p> <p>It is important that future amendments and approvals for the concept plan continue to reflect the requirements of the Commonwealth Minister's decision for the Military Heritage Precinct and Mont St Quentin Oval.</p>	<p>Noted. The Concept Plan retains the Ingleburn Military Heritage Precinct (Part of Lot 2 in DP 831152) and the Mont St Quentin Oval including entry gates and flag pole (Part of Lot 2 in DP 831150). Both items are identified as items of environmental heritage under the proposed SEPP Amendment.</p> <p>All of the heritage items contained within the Ingleburn Military Heritage Precinct will be retained and conserved. Appropriate adaptive reuse of the buildings will be investigated to ensure ongoing maintenance and Conservation. The Mont St Quentin Oval including entry gates and flag pole will be retained and refurbished within a new district park (subject to detailed design of Campbelltown Road).</p>
DEFENCE 6	<p>Condition 4 has been met and Defence is providing a copy of the condition report to the Department of Sustainability, Environment, Water, Population and Communities. The Concept Plan proposes the adaptive relocation of three Riley-Newsum pre-fabricated cottages within the proposed open space network. The Concept Plan refers to the removal by Defence of the Mess Hall and Lecture Hall in several places. Defence is currently in the process of seeking approvals for the removal of these Commonwealth and Local Listed heritage buildings which may or may not be forthcoming. Subject to this decision, Landcom may need to seek approval to demolish these two buildings.</p>	<p>Noted. It is proposed that the three Riley-Newsum pre-fabricated cottages will be listed as 'movable' heritage items under the SEPP Amendment. This is to reflect the Concept Plan proposal to retain but relocate and adaptively re-use the existing structures elsewhere within the site (if feasible and if can be made fit for purpose)</p> <p>The relocation and potential adaptive re-use of these items in the open space system is to be subject to ongoing investigation. This will involve assessing the state of the building, determining whether they can be physically relocated, refurbishment costs, safety issues, vandalism and heritage values.</p> <p>The Mess Hall, Ingleburn Army Camp and Lecture Hall Building (Nissen Hut) are not proposed for retention as heritage items as part of the SEPP Amendment on the basis that these are to be demolished by Defence under Commonwealth approval processes.</p>

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DEFENCE 7	The heritage listings described in Section 3.10, Table 6 of the Concept Plan are not correct. In brief, the Ingleburn Army Camp as a whole has never been listed on the Register of the National Estate or the Commonwealth Heritage List; the other items in the table are listed on the Commonwealth Heritage List. Figure 16 also contains errors by mis-naming the prefabricated cottages and confusing the location of the Lecture Hall.	<p>The 'Ingleburn Army Camp, Campbelltown Rd, Ingleburn Village, NSW' is listed as an item on the Commonwealth Heritage List and Register of the National Estate. It is acknowledged that the listings only refer to part of (approximately 120 hectares) of the entire Ingleburn Army Camp.</p> <p>In relation to Figure 16 in the concept plan, the location of the three Riley Newsum prefabricated cottages (referred to in this figure as '4') and two Amals Sagverks Aktiebolag (ASA) (referred to in this figure as '5') cottages shown in this figure are incorrect. An updated plan showing the correct locations of these buildings is provided at Appendix E.</p> <p>The location of the Lecture Hall Building (Nissen Hut) in Figure 16 and referred to as '3' is correct.</p>
DEFENCE 8	It should also be noted that the Commonwealth Property Disposals Policy requires the Department of Families, Housing, Community Services and Indigenous Affairs to advise on any special provisions to increase housing supply, improve community amenity and create new jobs. This advice has not yet been received by Defence. Such advice would normally be included as conditions in the contract of sale and has the potential to influence the type and nature of the development on the Defence site. Defence can advise the Department of Planning of any requirements when they are received. It is noted that Landcom proposes to include 5% of housing for moderate income earners and 5% of housing for seniors in Edmondson Park South.	<p>As part of the Concept Plan Statements of Commitments (refer to Commitments 65 and 66), Landcom will deliver a minimum 5% of total housing for Moderate Income Housing. Moderate Income Housing is housing that is affordable to households on moderate incomes being between 80% - 120% of the median gross household income in the Greater Sydney Region. Landcom will also target delivery of a minimum 5% of total housing for Seniors Housing. This includes all forms of seniors housing defined under State Environmental Planning Policy (Housing for Seniors and People with a Disability) including residential care facility, hostel and self-contained dwellings.</p> <p>Contract of sale conditions are a commercial matter between Landcom and the Department of Defence and are not relevant to this planning approval. Nor are they a matter for consideration under the EP&A Act.</p>

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DEFENCE 9	<p>The Ingleburn Defence site contains a number of items and areas of Aboriginal archaeological significance. The Stage 1 development and Concept Plan have the potential to impact on these items. Landcom states it will incorporate appropriate interpretation of the European and Aboriginal heritage values of the site into the development. Wherever possible, consistent with proper development of the site, the larger archaeological areas should be incorporated into the open space network without removal or destruction. It should be noted that the aerial extent of the larger sites are not fully reflected in Section 3.1 1, Figure 17 of the Concept Plan.</p>	<p>Figure 17 of the Concept Plan shows the location of identified archaeological sites within the study area. The red point 'AFT (Artefact)' in this figure refers to the location of each site as referenced on the Aboriginal Heritage Information Management System (AHIMS) Register of NSW. It does not and is not intended to show the full extent of each site.</p> <p>An Aboriginal Cultural Heritage Assessment Report (CHAR) has been prepared by Kelleher Nightingale Consulting Pty Ltd (refer to Appendix K of the EAR). The report assesses the aboriginal cultural heritage values of the site and the potential impacts of the proposed development on aboriginal cultural heritage. This assessment was carried out over the entire extent of each identified archaeological site.</p> <p>As discussed in Sections 3.11 and 8.7 of the Concept Plan / SSS Study, the majority of the sites identified in the Concept Plan are located in a highly disturbed context and exhibit low archaeological significance. Due the extent of historical studies undertaken the Concept Plan designs have taken into account the identified archaeological sites and the design has aimed to avoid and minimise impacts on the archaeological sites and cultural places. Ten (10) sites will not be impacted upon, including three sites identified as being of high significance.</p> <p>Of the remaining twenty (20) sites to be impacted, three (3) sites are of moderate to high significance and three (3) sites are of moderate significance. The remaining 14 (14) sites have been assessed as having low or low-moderate significance. The sites impacted upon will be within future urban areas or be impacted upon by future infrastructure works. Six (6) significant sites are conserved with the regional park.</p> <p>The report sets out a number of recommendations to manage the cultural and archaeological heritage on the site. Recommendations have been incorporated into the Statement of Commitments (refer to Commitments Nos. 53 to 61).</p>
DEFENCE 10	<p>Defence is currently undertaking remediation works on the Ingleburn site and these are expected to be completed by mid-November 2010. It is Defence's intention to obtain a Section A Site Audit Statement and Site Audit Report under the Contaminated Land Management Act 1997 confirming that all land on the site is suitable for its intended end use; this should be available in February 201 1.</p>	<p>Noted. Defence will obtain a Site Audit Statement and Site Audit Report under the NSW Contaminated Land Management Act 1997, confirming that all land on the site is suitable for its intended end use.</p>
DEFENCE 11	<p>Defence does not anticipate approval for commencement of any development on the Defence site by Landcom prior to the exchange of a contract of sale. Defence would be pleased to discuss this submission or to provide further information if required.</p>	<p>Noted.</p>
DEPARTMENT OF DEFENCE (letter dated 27 October 2010)		

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DEFENCE 12	<p>Some 10 years ago, in consultation with the NSW Department of Planning and to meet its requirements, Defence sponsored extensive plantings of Cumberland Plain Woodland species along the Defence boundary with the F5 freeway to provide a visual buffer. In conjunction with Campbelltown City Council and ex-service groups, the plantings were identified as a Memorial Forest to the ex-servicemen who had served at the Ingleburn Army Camp.</p> <p>Members of ex-service groups, especially from World War II and the Vietnam War, together with school children from Ingleburn North Public School, took part in the planting of the Memorial Forest. Establishment of the forest was setback by the extended drought but now many of the surviving trees are growing well and can be readily observed both from within the site and the F5 freeway. More recently, Campbelltown City Council allocated funds for a plaque to mark the location of the Memorial Forest; this has not proceeded due to theft and vandalism on the site.</p>	Noted.
DEFENCE 13	<p>The Memorial Forest is recognised in the "delayed rezoning" maps of the site as Public Open Space and Private Open Space areas adjacent to the F5.</p> <p>Landcom proposes to amend the Private Open Space zone to an Environmental Living Zone. Page 189 of the report "State Significant Site Study and Environmental Assessment Report - Concept Plan and State Significant Site Listing" details a commitment:</p> <p><i>"15 - The detailed design of development in the E4 Environmental Living Zone along the South Western Freeway edge of the site will ensure that no habitable structures are established within 30 metres of the site boundary to the Freeway reservation, and will retain existing vegetation within private backyards where possible."</i></p> <p>While Defence has no objection to the change in the zoning of this land, it believes the Memorial Forest must be retained and enhanced to honour the intention of the ex-service groups and the local school children. Defence suggests that a condition of any approval must include a requirement on Landcom and future owners to retain and enhance the Memorial Forest along the F5 as well as the installation of appropriate signage within the Memorial Forest. The proposed 30m wide protection area would be sufficient.</p> <p>The Memorial Forest in the Public Open Space identified in the plans as part of Maxwell Creek South Riparian Park and the South West Detention Basin and Park must similarly be retained and enhanced, allowing for small losses as a result of the proposed location of the detention basins.</p>	<p>Noted. The proposed rezoning of this part of the site (i.e. along South Western Freeway edge of the site) from 6(a) Local Open Space and 6(c) Private Open Space under Campbelltown (Urban Area LEP 2002) to E4 Environmental Living better reflects the nature of development envisaged within this zone (i.e. low impact residential development that will not have an adverse effect on the environmental qualities of this land).</p> <p>As acknowledged by the Department of Defence, the 30 m restriction (now proposed to be 37 to 45m) on title as measured from the site boundary to the Freeway reservation, prohibiting any built structure within this area will enable the retention of as much vegetation as possible including that contained within the Memorial Forest.</p> <p>Landcom supports the retention and enhancement of the Memorial Forest within the area proposed to be zoned RE1 Public Recreation (this land is to be transferred to Campbelltown Council). Landcom is also supportive of providing interpretative signage within this part of the Memorial Forest area. An additional Statement of Commitment has been included in relation to the above (refer to Statement of Commitment Nos 15 and 16).</p>
	DEPARTMENT OF PLANNING (letter dated 2 November 2010)	
DoP 1	In accordance with section 75H of the <i>Environmental Planning and Assessment Act 1979</i> , the Director General requires the proponent to respond to the issues raised in these submissions in a Submissions Report.	Noted.
DoP 2	If there are any proposed changes to the project to minimise its environmental impact, a Preferred Project Report (PPR) is required. The Statement of Commitments may need to be revised to reflect any proposed changes to the project.	Noted. A PPR for both the Concept Plan and Stage 1 proposals has been prepared, incorporating revised Statements of Commitments to respond to issues arising from the submissions made during public exhibition and assessment by the Department.

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DoP 3	<p>Development controls</p> <ul style="list-style-type: none"> Provide an analysis of the Concept Plan against the draft Bardia Sub-precinct DCP (currently on exhibition), and any other aspects of the Campbelltown DCP which would apply to the site. 	<p>Section 2.5 of the Concept Plan PPR sets out the manner in which the current draft version of the Bardia Sub-precinct DCP controls are proposed to be applied to the site. It is noted that at the time of writing the draft DCP has been publicly exhibited, but not yet adopted in its final form.</p> <p>Landcom met with Campbelltown Council on 15 November 2010 to discuss the draft Bardia Sub-precinct DCP. Landcom is committed to working with Campbelltown Council to ensure that an appropriate development control framework is established for Edmondson Park South, which is not inconsistent with the aims and objectives of Council's draft DCP but still allows development to proceed on the site in accordance with the Edmondson Park South vision.</p> <p>Post approval of the Concept Plan, Landcom will prepare a Development Control Strategy (DCS) that will provide a single, integrated set of planning controls for the site (refer to new Statement of Commitment No. 10).</p>
DoP 4	<ul style="list-style-type: none"> Provide an analysis of the concept plan against all aspects of the Liverpool DCP 2008 which apply to the site. The Concept Plan currently only provides an analysis against the Section 2.11 of the DCP. 	<p>As discussed in Section 7.0 of the Concept Plan EAR, the following parts of Liverpool DCP 2008 apply to the Edmondson Park Precinct:</p> <ul style="list-style-type: none"> Part 1.1 General Controls for all Development and 1.2 Additional General Controls for Development (except for controls for dwelling houses, dwelling houses on hatchet shaped lots and semi detached dwellings and attached dwellings); Part 2.11 Land Subdivision and Development in Edmondson Park; and Part 3.8 Non Residential Development in Residential Zones. <p>Parts 3.1 to 3.7 of DCP 2008 do not apply to Edmondson Park.</p> <p>Table 18 on page 136-138 of the Concept Plan EAR sets out the manner in which the existing Liverpool DCP 2008 Part 2.11 controls are proposed to be applied.</p> <p>Section 2.5 of the Concept Plan PPR sets out the manner in which the remaining parts of Liverpool DCP 2008 controls that apply to the site (i.e. Parts 1.1, 1.2 and 3.8) are proposed to be applied.</p>
DoP 5	<ul style="list-style-type: none"> Provide further clarification on how the Concept Plan is intended to operate alongside the relevant DCPs, and demonstrate how future development within the site will be guided by an integrated set of development and built form controls. 	<p>To ensure that an appropriate and integrated development control framework is established for Edmondson Park South, Landcom will prepare a consolidated DCS to support the Concept Plan. This will be submitted to the Department of Planning and Liverpool and Campbelltown Council's post approval of the Concept Plan. The DCS will compile into a single consolidated document all development controls which have been proposed to apply to land uses or activities which are permitted within Edmondson Park South and fall within either the LGA of Liverpool or Campbelltown, including specifically the provisions identified in Table 18 on pages 136-138 of the Concept Plan EAR and in Tables 1-5 at Section 2.5 of the Concept Plan PPR. Refer to new Statement of Commitment 10.</p>

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DoP 6	<ul style="list-style-type: none"> Identify the development controls that will apply to lots smaller than those envisaged under the existing planning framework. 	<p>Landcom has committed to preparation of a consolidated Development Control Strategy (DCS) to guide the assessment of future detailed development within the framework of the approved Concept Plan. The DCS will compile into a single consolidated document all of the existing development controls under Liverpool DCP 2008 and Campbelltown Council's Draft Bardia Sub-Precinct Development Control Plan which are proposed to apply to land uses or activities within Edmondson Park South. In addition, the DCS will incorporate new development controls for residential development on small lots. It is proposed that these controls be finalised in consultation with both Liverpool and Campbelltown Council's and submitted to the Director General of the Department of Planning prior to lodgement of any future subdivision application (refer to Statement of Commitment No. 10).</p>
DoP 7	<ul style="list-style-type: none"> The Liverpool DCP 2008 currently requires a detailed DCP to be prepared for the Edmondson Park Town Centre. Demonstrate how consistent built form and urban design controls will be developed and applied across the Edmondson Park Town Centre (including for those lots within the Town Centre, which do not form part of the Concept Plan proposal). 	<p>Landcom will prepare a single application that includes all of the land within the Edmondson Park South Project site that will form the future Edmondson Park Town Centre. The single application will provide an integrated proposal for the establishment of the key elements of the road network, public domain framework, water cycle management network and distribution of residual development lots within the Town Centre. The single application will demonstrate how the objectives for the Town Centre will meet the relevant principles and provisions set out at Sections 1.4 and 3 of Part 2.11 of Liverpool DCP 2008 and the draft Bardia Sub-precinct DCP, or equivalent document.</p> <p>Landcom understands that the Department of Planning intends to zone all of the land within the Town Centre as part of the SEPP Amendment, including land that is outside the Edmondson Park South site boundary. The single application will also demonstrate how future development within the Edmondson Park Town Centre is integrated with land that does not form part of the Concept Plan proposal but is included in the overall Town Centre (refer to revised Statement of Commitment No. 11).</p> <p>The single application will propose development controls for both Landcom and non-Landcom land. These controls will be incorporated into the DCS for Edmondson Park South. Landcom will work with and encourage both Liverpool and Campbelltown Council to include proposed development controls into a DCP amendment.</p>
DoP 8	<p>Dwelling yield</p> <ul style="list-style-type: none"> Provide a detailed analysis of the proposed dwelling yield against the dwelling yield that would be achieved under the existing controls. Demonstrate that the proposal would provide a sufficient portion of dwellings to contribute to the overall target of 7,500 dwellings for the Edmondson Park precinct having consideration for its location adjacent to the planned Edmondson Park station. 	<p>Landcom recognises the need to achieve an overall minimum dwelling yield and has divided the site into a number of development areas (7 areas in total), each with a minimum target yield and average density. The objective of delivering a minimum dwelling yield within the site to assist in meeting State government targets remains a fundamental component of the project.</p> <p>A detailed analysis of the proposed dwelling yield against the dwelling yield that would be achieved under the existing controls is provided in Section 2.2 of the PPR. It demonstrates that the 3,530 dwellings proposed at Edmondson Park South is a sufficient portion of the total 7,500 dwellings required.</p>
DoP 9	<ul style="list-style-type: none"> Provide an analysis of the proposed dwelling density within the Edmondson Park town centre against the minimum dwelling yield that would be achieved under the existing controls, and justify any variation of dwelling yield. 	<p>A detailed analysis of the proposed dwelling density within the Edmondson Park Town Centre against the minimum dwelling yield that would be achieved under the existing controls is provided in Section 2.2 of the PPR.</p>

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DoP 10	<ul style="list-style-type: none"> Concern is raised that the application of the R1 General Residential zone across the site will not facilitate the development of medium and higher density development near the planned Edmondson Park town centre and train station. Demonstrate how an appropriate distribution of residential densities will be achieved across the site. 	<p>A detailed analysis of residential densities near the Edmondson Park Town Centre and amended precinct yield plan is provided in Section 2.2 of the PPR. The density analysis demonstrates that development in accordance with the precinct yield plan will facilitate the development of medium and higher density development towards the Town Centre and Railway Station.</p>
DoP 11	<ul style="list-style-type: none"> It is noted the B4 Mixed Use zone which is proposed to be applied to the Edmondson Park town centre permits all types of dwelling houses including single dwellings, and attached and semi-attached dwellings. The existing zone only allows for residential flat buildings where they are part of a mixed use development. This is a significant departure from the existing controls, and further justification for this change is requested. 	<p>In relation to the B4 Mixed Use zone, the proposed land use table has been amended in so far as “dwelling houses” are now listed as prohibited development within the B4 Mixed Use zone.</p> <p>In relation to attached and semi-attached dwellings, it is still proposed to permit this type of residential development within the proposed B4 Mixed Use Zone. The inclusion of these types of residential development will provide a diversity of housing and offers housing and lifestyle choice for people of all ages. It is noted that only 20% of dwellings (indicatively) in total are envisaged to comprise attached housing, dual occupancies and semi-detached housing.</p> <p>Liverpool LEP 2008 permits stand alone residential flat buildings within Edmondson Park (refer to Schedule 1 of Liverpool LEP 2008).</p> <p>It is noted that Clause 7.16 of Liverpool LEP 2008 which requires the ground floor of development in Zone B2, amongst other zones, to comprise non-residential development specifically does not apply to land at Edmondson Park.</p> <p>Landcom considers restricting residential development in the proposed B4 Mixed Use zone to comprise only residential flat buildings in conjunction with non-residential development to be an unnecessary constraint and therefore specifically requests that the DoP allow stand alone residential flat buildings, consistent with the Liverpool LEP 2008.</p>

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DoP 12	<p>Retail floor space - Edmondson Park town centre</p> <p>The Edmondson Park Precinct is identified in the South West Growth Centre's Structure Plan as containing a 'town centre' under the Centre types. The proponent should demonstrate how the proposed floor space for the town centre was derived, and justify how this will fit within the Growth Centre's Structure Plan.</p>	<p>As discussed in Section 8.15.1 of the Concept Plan / SSS Study, the draft South-West Sub Regional Strategy (2007) identifies Edmondson Park as a 'Town Centre'. The South-West Sub Regional Strategy describes town centres as being centres that have one or two supermarkets, community facilities, medical centre, schools etc and support between 4,500 and 9,500 dwellings.</p> <p>The draft South-West Sub Regional Strategy identifies that based on retail analysis, the Edmondson Park Town Centre will provide a <u>minimum</u> of 25,000m² of retail uses and a <u>minimum</u> 10,000 m² of commercial uses. It is envisaged under the draft Strategy that the town centre will contain two supermarkets (each 4,000 m² in area), a discount department store (7,000m²), and a range of speciality shops in a minimum of three development blocks. Finer grained specialty shops are to line the supermarkets and discount department stores, so that an active street edge is presented to the public domain. A cinema complex is envisaged within a few minutes' walk of the rail/bus interchange.</p> <p>In summary, the draft South-West Sub Regional Strategy identifies a town centre with a minimum 35,000m² of combined retail and commercial floor space. The Concept Plan provides for the new Edmondson Park Town Centre with capacity for approximately 35,000 – 45,000 m² of non-residential floor space for retail, office and business uses. It is therefore consistent with the draft South West Growth Centre's Structure Plan.</p> <p>A Centres and Retail Analysis to support the urban release, rezoning and development of the Edmondson Park Precinct was prepared on behalf of Liverpool and Campbelltown City Councils by Patrick Partners (May 2003). The Centres and Retail Analysis assessed the potential for retail within the Edmondson Park Precinct. The assessment concluded that whilst the major retail and commercial centres at Liverpool and Campbelltown were located some 5 km and 10 km respectively from the Edmondson Park Precinct, there was insufficient provision to the west of Edmondson Park in areas such as Leppington, Denham Court, Austral and Catherine Fields. In addition, access to retail centres from these areas was considered inadequate. The Analysis concluded that with the estimated population catchment, the Edmondson Park Town Centre could operate as a district centre comprising some 25,000m² - 30,000m² of retail floor space. This figure (i.e. 25,000 - 30,000m²) does not include commercial floor space for office, business and community uses.</p> <p>The proposed Town Centre, and the quantum of retail, business and commercial floor space proposed within it, is entirely consistent with the South-West Sub Regional Strategy (DATE) and the Centres and Retail Analysis prepared to support the urban release, rezoning and development of the Edmondson Park Precinct in 2006.</p>

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DoP 13	<p>The Department considers that an FSR control should be applied to the Edmondson Park Town Centre (consistent with the recommended approach in the LEP Practice Note PN 08-001). Accordingly, if Landcom considers that the FSR controls under the Liverpool LEP are not appropriate, an alternative FSR should be nominated and justified.</p>	<p>It is proposed that a maximum FSR of 2:1 will apply to land to the north of the proposed railway station proposed to be zoned B4 Mixed Use and a maximum FSR of 2.5:1 will apply to land to the south of the proposed railway proposed to be zoned B4 Mixed Use and comprising the Edmondson Park Town Centre. These FSR controls are consistent with the FSR controls that currently apply to the land under Liverpool LEP 2008.</p> <p>Notwithstanding the above FSR controls, it is requested that the SEPP Amendment include a special provision to the effect of setting aside the FSR development standard (i.e. 2:1 and 2.5:1) in so far as it relates to the envisaged 30 m high landmark tower that is proposed to be located within 300 m of the Edmondson Park Railway Station, the location of which will be firmed up as part of the single application prepared for the Edmondson Park Town Centre.</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
DoP 14	<p>Biodiversity and conservation <u>State significant site listing</u> The Department considers that appropriate zones and controls are required to ensure the ongoing protection of the proposed 4.2 hectares of Existing Native Vegetation (ENV) located on 'certified' lands. In this regard the Department considers that these areas should be zoned E2 Environmental Conservation and that development controls be imposed to restrict vegetation clearing (for example clause 6.2 and 6.3 Appendix 2 North Kellyville Precinct Plan under the Growth Centres SEPP).</p>	<p>The area of certified ENV land that is proposed to be retained as part of the Concept Plan (comprising open space areas and areas of additional Regional Park adjacent to Zouch Road), as stated in the Ecological Assessment, prepared by Ecological Australia and included at Appendix G of the Concept Plan PPR was incorrectly calculated at 4.2 hectares (Section 5, page 27 of this report). This figure should refer to 4.36 hectares.</p> <p>The 4.36 hectares of existing certified ENV that is proposed to be retained as part of the Concept Plan is currently zoned RE1 Public Recreation under Liverpool LEP 2008 (except for Area 1 on Figure 1 of Addendum 1 in Appendix G which is currently zoned 2(c) Higher Density Residential under Campbelltown LEP 2002). Under the proposed SEPP Amendment this land (i.e. the 4.36 hectares) is proposed to remain zoned RE1 Public Recreation. Refer to Ecological Reports included at Appendix G of the Concept Plan PPR.</p> <p>The Edmondson Park Precinct has a long history of detailed survey and assessment of ecological values. This assessment information has been used to assist in the preparation of the Western Sydney Growth Centres Conservation Plan and subsequent Biodiversity Certification of the Growth Centres SEPP conferred by the Minister for the Environment on 11 December 2007 under the Threatened Species Conservation Act 1995 (TSCA).</p> <p>The 2007 Biodiversity Certification Order identifies lands under the Growth Centres SEPP as 'certified' and 'non-certified'. The proposed 4.36 hectares of land is identified as 'certified' under the Biodiversity Certification Order. 'Certified' areas include areas of lower conservation value. Due to its location, dimensions, configuration and separation, the proposed 4.36 hectares of certified ENV does not form part the core conservation values of the larger Edmondson Park Precinct, rather this area is considered to have a secondary level of importance.</p> <p>The parcels of land within which the 4.36 ha of ENV is located will need to accommodate a combination of passive and active recreation as well as vegetation conservation purposes.</p> <p>Furthermore, under the <i>Local Government Act, 1993</i>, (the LGA Act) Liverpool Council must prepare and implement a Plan of Management for this area. Chapter 6, Part 2, Division 2 of the Local Government Act sets out a number of elements that must be addressed in a plan of management including requirements for land that includes endangered species and ecological communities</p> <p>It is considered that certified ENV within the 4.36 hectares of land can be appropriately managed within a RE1 Public Recreation zone.</p> <p>Landcom will assist Council in the preparation of the plan of management for this land prior to its handover to the Council (refer to new Statement of Commitment No. 8).</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
DoP 15	<p>The Department also considers that areas identified under the Conservation Agreement as Open Space Public (for conservation) should be zoned E2 Environmental Conservation. The Department intends to prepare the draft amendment to the Major Development SEPP to list the site as a State significant site on this basis.</p>	<p>As discussed above, the Edmondson Park Precinct has a long history of detailed survey and assessment of ecological values. It is not considered necessary to rezone land identified under the Conservation Agreement as Public Open Space (for conservation) to E2 Environmental Conservation. As outlined in the conservation agreement, land designated as public open space is in the care, control and management of the relevant Council and must be managed in accordance with a plan of management in accordance with the LGA Act.</p> <p>For areas designated as Public Open Space (for conservation) under the Conservation Agreement, plans of management are to incorporate measures to retain Cumberland Plain Woodland (CPW) values through:</p> <ul style="list-style-type: none"> ■ the retention of trees; ■ maintenance of existing native understorey; and ■ location passive and active facilities cognisant of existing CPW (refer to Schedule 4, Clause 3.2 of the Conservation Agreement). <p>It should be noted that neither Liverpool or Campbelltown Council's have requested that areas of existing public open space under the Conservation Agreement should be zoned E2 Environmental Conservation.</p> <p>Landcom will assist Council in the preparation of a plan of management for this land (refer to new Statement of Commitment No. 8).</p>
DoP 16	<p><u>Conservation agreement</u> The proposed Concept Plan is not consistent with the Conservation Agreement and proposes a number of amendments to the location of open space areas, the boundary of the Regional Park as originally identified in Map 3 in Schedule 2 of the Conservation Agreement. The Concept Plan also proposes vegetation clearing through the proposed Regional Park for a sewer main and for clearing within a Lead Particulate Area.</p>	<p>It is noted that DSEWPC accepts the conclusion of the EcoLogical Australia assessment report in relation to the Concept Plan and that all the requirements of the EPBC Act Conservation Agreement are met or exceeded.</p>
DoP 17	<p>The Department considers that the Conservation Agreement requires amendment prior to determination of Landcom's proposal. Such an amendment would require written agreement of all parties to the Conservation Agreement. Accordingly, the Department considers that Landcom should write to the Minister for Planning and the Minister for Climate Change and the Environment seeking their support for an amendment to the Conservation Agreement and requesting that they seek the Agreement of the Federal Minister for Sustainability, Environment, Water, Population and Communities. Landcom's request should outline and justify all proposed variations to, and inconsistencies with, the Conservation Agreement and should include relevant maps.</p>	<p>In accordance with Clause 7(a) and 12 of the Conservation Agreement, Landcom has written to the Minister for Planning and the Minister for Climate Change and the Environment seeking their support for an amendment to the Conservation Agreement and requesting that they seek the agreement of the Commonwealth Minister for Sustainability, Environment, Water, Population and Communities (refer to letter dated 19 November 2010 included at Appendix D).</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
DoP 18	<p>Landowner consent</p> <ul style="list-style-type: none"> Provide landowner consent for land outside the ownership of the Proponent under 8F of the Environmental Planning and Assessment Regulation 2000. 	<p>Noted. In accordance with Clause 8F(1) and (3) of the Environmental Planning and Assessment Regulation 2000, the consent of the owner of land is not required to lodge a Concept Plan or Project Application under Part 3A if the application is made by a public authority and the proponent has given notice to the owner of the land at any time before the application is made. Landcom is a public authority and all other landowners including public authorities / agencies were notified prior to submission and therefore owners consent is not a pre-requisite to determination of the proposal.</p> <p>Notwithstanding, Landcom is pursuing owners consent from the Department of Defence.</p>
DoP 19	<p>Demolition works</p> <ul style="list-style-type: none"> The EA identifies impact zones (10m or 3m) for proposed demolition works. However, it is not clear whether any impacts zones would be located within areas of [non] certified vegetation. Provide information to clarify the location of the impact zones in relation to areas of [non] certified vegetation. This is required to ensure any impact to existing native vegetation is accurately identified and assessed. 	<p>No demolition work (built structures or roads) is proposed on land located within areas of non-certified vegetation.</p>
DoP 20	<ul style="list-style-type: none"> As requested in the Department's letter of 9 September 2010, provide a strategy to manage the proposed demolition of existing structures across the site, including the proposed timing of the works. 	<p>Detailed demolition plans have been prepared by Landcom (refer to Appendix H). The plans show the proposed buildings and structures to be demolished (in addition to existing roads) throughout the site. In terms of timing, demolition work will commence prior to June 2011 and be completed within 2 years.</p>
DoP 21	<p>Contamination & Remediation works</p> <p>The proposals are seeking to allow works required to address any unidentified finds to proceed without further environmental assessment for <i>works associated with the site preparation phase of the development</i>. The CMP would be used to manage the process of identifying the contaminants and the process to undertake remediation works.</p> <p>The Department has concerns about granting approval for such remediation works and would like to discuss this further including developing appropriate parameters. In particular the Department has concerns about how these works may impact on vegetation to be protected under the Conservation Agreement and Biodiversity Certification. It would also be necessary to clarify what works would be considered part of the 'site preparation phase'.</p>	<p>The CMP provides a framework for identifying and addressing any unexpected discovery of contaminated materials or potentially explosive ordnance across the entire site. The CMP provides clear guidance on the safe and appropriate actions in the event of encountering unexpected finds during the site's redevelopment.</p> <p>Unexpected finds may occur in areas which, although searched extensively, contain remnant materials which obscured by topography, the type of surface cover (e.g. under a building, road or vegetation) or at a depth preventing detection. Unidentified and unexpected finds are to a large extent outside of Landcom's control.</p> <p>In the event that an 'unidentified find' is found, the site will be remediated in accordance with the processes set out in the CMP and SEPP 55. Should the 'unidentified find' be located on land identified under the Conservation Agreement, an ecologist will be consulted to provide advice and manage any necessary revegetation works. Any unidentified find within the Regional Park will be managed in accordance with the CMP and the Statement of Interim Management Intent.</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
DoP 22	<p>Noise</p> <p>The noise assessment for the concept plan EA should be amended to include an assessment of the impact of increased traffic on existing land uses. Further, the assessment of increased traffic noise at the existing dwellings provided with the project application EA should be amended to specifically identify the expected noise increase at the existing dwellings.</p> <p>Clarification is also sought on the assessment of rail and road traffic noise at residences within the site, as outlined the Concept Plan (section 4.3 of Appendix U). The report states that ventilation is required if the internal noise criteria set out in the <i>Development Near Rail Corridors and Busy Roads - Interim Guideline</i> is exceeded by more than 10dBA, however the proposed criteria for provision of ventilation is 20dBA above the relevant criteria set out in the <i>Development Near Rail Corridors and Busy Roads - Interim Guideline</i>.</p>	<p>A Supplementary Noise Assessment Report has been prepared by Wilkinson Murray and is included at Appendix I. The supplementary noise assessment provides an assessment of the impact of increased traffic noise on existing land uses and provides clarification on the assessment of rail and road traffic noise at residences within the site.</p> <p>In relation to traffic noise, a review of predicted noise levels indicates that traffic noise levels at assessed residences along Campbelltown Road will be above the ECRTN noise objectives with or without the development. This being the case the increase in noise levels has been reviewed with respect to the 2 dBA increase objective.</p> <p>In the case of all existing residences to the West of Zouch Road a maximum increase of 0.3 dBA is predicted at residences with the development traffic flows. This is well below the allowable 2 dBA increase and is therefore considered acoustically acceptable.</p> <p>In the case of residences that are to be constructed along Campbelltown Road at Ingleburn Gardens the resulting increase in noise levels associated with the Edmondson Park development is slightly higher (0.2 dBA) than the allowable 2 dBA increase. However, it is noted these residences in the estate have been identified in the assessment of the Ingleburn Gardens site as being potentially affected by traffic noise. Therefore noise mitigation, including a noise wall, has been included in the design of this development to address traffic noise impacts. Therefore the acoustic amenity of these future residences has been addressed in the urban design of the Ingleburn Estate development and therefore the impact of increased traffic on these properties as a result of the concept proposal and project application is considered satisfactory.</p> <p>In relation to rail and road traffic noise at residences within the site, the applicable <u>internal</u> rail and road traffic criteria, set out in the 'Developments Near Rail Corridors and Busy Roads – Interim Guideline' has been translated to <u>external</u> noise criteria by allowing a 10 dBA reduction in noise levels from outside to inside (windows open). That is, an internal noise criterion of 35 dBA equates to an external noise levels of 35 dBA plus 10 dBA = 45 dBA. The requirement for ventilation is when noise levels are 10 dBA above this level, therefore an external noise level of 55 dBA would trigger the need for ventilation.</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
DoP 23	<p>Sales offices The EA only provides plans for the temporary sales and information centre to be located near to Macdonald Road. Further details for the sales office proposed to be located within the Ingleburn Military Heritage Precinct (IMHP) are required. This should include:</p> <ul style="list-style-type: none"> ▪ Confirmation of the building location, any alterations and additions or signage proposed along with access arrangements and operational details including the intended duration of use. ▪ Demonstrate how potential impact on the heritage significance of the precinct (and the building) will be managed. The Statement of Heritage Impact should discuss the proposed adaptive re-use of the building within the IMHP for a temporary sales and information centre. 	<p>The Concept Plan proposal has been amended to delete the reference to a temporary sales and information centre within the Ingleburn Military Heritage Precinct. Any proposal to do so will be subject of a future separate application. Refer to Section 2.1 of the Concept Plan PPR.</p>
DoP 24	<p>Signage As requested in the Department's letter of 9 September 2010, provide a strategy to manage the proposed temporary signage, including an outline of which signage is required during the construction of each stage.</p>	<p>In relation to the proposed temporary sales and information signage, the potential locations and different types of sales and information signage has been further refined (refer to Proposed Signage Plans included at Appendix J). The proposed temporary sales and information signs will comprise 'entry billboards', 'destination billboards', 'talker signs' and 'blade signs'.</p> <p>The proposed signage plans show the location of each type of sign, proposed dimensions and envisaged text.</p> <p>The number of potential locations along Campbelltown Road for 'billboard signs' has been reduced from 8 to 4 (one site with double sided in V shape adjacent intersection with current MacDonald Road). It is proposed these signs will remain in these locations for a period of approximately 10 years. These signs will be maintained and updated at regular times.</p> <p>No signs are now proposed within the Edmondson Regional Park (i.e. former sign No. 12 on Figure 30 has been deleted).</p> <p>There will be an entry sign to the Regional Park and this will be detailed as required with plans for the embellishment of the park. This sign will be form part of a separation application (if required).</p> <p>No signs are proposed north of the rail corridor at this stage. Any signs in this area will be subject to future approvals.</p> <p>A maximum of 16 'talker' signs will be installed initially in the locations indicated, and will be moved around the development to correspond with future development stages.</p> <p>A blade sign will be erected at the Sales Office to Stage 1.</p> <p>It is noted that the proposed temporary sales and information signage for which consent is sought under the Concept Plan is considered to constitute business identification signage and / or building identification signage within the definitions under SEPP 64.</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
DoP 25	<p>Staging of infrastructure As requested in the Department's letter of 9 September 2010, provide details of the infrastructure to be provided with each subsequent stage.</p>	<p>Revised Schedules prepared by Landcom outlining the proposed scope of local contributions within both the Liverpool and Campbelltown LGAs are included at Appendix K of the Concept Plan PPR.</p>
DoP 26	<p>Aboriginal heritage As requested in the Department's letter of 9 September 2010, provide the final Aboriginal Cultural Heritage Assessment report, including outcomes of consultation with Aboriginal stakeholders.</p>	<p>A final Aboriginal Cultural Heritage Assessment Report, prepared by Kelleher Nightingale Consulting Pty Ltd is included at Appendix F. The assessment has been updated to include outcomes of consultation with Aboriginal stakeholders.</p>
DoP 27	<p>Campbelltown Road Provide diagrams (i.e. plans and sections) showing the proposed relationship between Campbelltown Road and adjoining heritage items, school site and the regional park.</p>	<p>Plans and sections showing the proposed relationship between Campbelltown Road and adjoining heritage items, school site and the Regional Park, prepared by J Wyndham Prince are included at Appendix L.</p>
DEPARTMENT OF PLANNING (email dated 10 November 2010)		
DoP 28	<p>Requirement for a Flood Planning Map and a FSR map (relating to the B4 zone).</p>	<p>Details in relation to the proposed application of an FSR standard within the Town Centre are provided at Section 2.3 of the Concept Plan PPR and Appendix C.</p> <p>Details in relation to flooding has been separated submitted to the Department of Planning.</p>
DoP 29	<p>Requirement for mapping data identifying the proposed substation and confirmation of the relevant acquisition authority.</p>	<p>Mapping data identifying the proposed substation was provided to the Department of Planning on 16 November 2010.</p> <p>Notwithstanding, it is not considered necessary to zone proposed substations SP2 Infrastructure under the SEPP Amendment. In accordance with Clause 41(1) and (2) of State Environmental Planning Policy (Infrastructure) 2007, development for the purpose of an 'electricity transmission or distribution network' which includes the establishment of a new substation, may be carried out by or on behalf of an electricity supply authority or public authority without consent on any land.</p>
DoP 30	<p>Confirmation on the ownership of the Sydney Water site.</p>	<p>The legal description of the Sydney Water site is Lot 1 in DP 1144667. The registered owner is Sydney Water Corporation. This information was provided to the DoP on 16 November 2010.</p>
DoP 31	<p>Provide mapping data identifying the proposed ENV offsets</p>	<p>Mapping data identifying the 4.36 ha of certified ENV was provided to the Department of Planning on 17 November 2010.</p>
DoP 32	<p>Clarification as to whether there are two different maximum building heights proposed for the existing school site on McDonald Road, and whether the narrow area adjacent to the intersection of Campbelltown Rd and McDonald Rd (opposite the school) is meant to have a 9.5m height limit of a 12m height limit.</p>	<p>The proposed maximum building for the existing school site on Macdonald Road is 9.5 m. The Draft Maximum Building Height Plan shown at Figure 34 is incorrect in respect of the existing school site. The narrow area of land, adjacent to the intersection of Campbelltown Road and Macdonald Road has a proposed height limit of 9.5 m, as reflected in Figure 34.</p> <p>A marked up plan clarifying the proposed maximum building height for the existing school site on Macdonald Road was submitted to the Department of Planning on 16 November 2010.</p>
SYDNEY WATER (letter dated 25 October 2010)		

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
SW 1	<p>Sydney Water's comments relate to:</p> <ul style="list-style-type: none"> ▪ provision of water, wastewater and recycled water services to the proposed development ▪ support from the Department of Environment, Climate Change and Water (DECCW) for the proposed gravity wastewater main through the future Regional Park ▪ impacts of the State Significant Site listing on future works by Sydney Water 	Noted.
SW 2	<p>1. Water related services</p> <p>Sydney Water has an approved strategy in place for the provision of drinking water, wastewater and recycled water services to the Edmondson park precinct. Sydney Water is currently finalising the Review of Environmental Factors (REF) for the delivery of trunk infrastructure to the Edmondson park precinct. The REF is expected to be determined in early November 2010.</p>	Noted.
SW 3	<p>1.1 Drinking water and recycled water scheme plans</p> <p>In mid 2010 Sydney Water completed a dual reticulation scheme plan for the Edmondson Park precinct. This plan was based on road layouts provided at the time. Sydney Water and its consultants are currently revising the scheme plan based on the most recent road layouts lodged under the Stage 1 proposal. These works are expected to be complete by late November 2010. Following the completion of the scheme plans, the size and location of future drinking and recycled water mains will be available for the developer to proceed with detail designs for the construction of mains to service Edmondson Park South.</p> <p>Ultimately the proposed Edmondson Park South development area will be serviced by a future 3.4km lead-in 300mm drinking water main, and pressure reducing valve from the existing Raby reservoir. The proposed Stage 1 subdivision is not currently serviced by a Sydney Water drinking water main. The nearest drinking water main available for connection is located in Campbelltown Road. The developer will be required to extend the drinking water main from Campbelltown Road to the proposed subdivision.</p> <p>Sydney Water is currently reviewing the proposed interim servicing arrangement (from the existing main in Campbelltown Road) based on the road layout lodged under the Stage 1 proposal, and current system conditions. The assessment of the interim servicing arrangement is being done in conjunction with the revised dual reticulation scheme plan, and is scheduled for completion in late November 2010. Subject to the final dual reticulation scheme layout the drinking water main extension will be located in the most optimal location based on the proposed ultimate road layout.</p>	Noted.

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
SW 4	<p>1.2 Hoxton park Recycled Water Scheme</p> <p>The Edmondson Park development is located within the servicing area of Sydney Water's Hoxton park Recycled Water Supply Scheme. As such the precinct will be serviced by a dual reticulation system, with recycled water being available for non-potable uses including watering of residential gardens, toilet flushing, car washing and washing machine use.</p> <p>The primary source of water for fire fighting within the precinct is the drinking water network. All fire service connections will be made to the non drinking water mains. However, street hydrants on the recycled water main will be made accessible to the fire brigade for fire fighting purposes if required in an emergency.</p> <p>The Hoxton Park Recycled Water Scheme will be delivered in two stages. Stage 1 is programmed for completion in late 2013, and delivery of Stage 2 is anticipated in 2017. Stage one of the scheme will provide recycled water to Edmondson Park. Construction of the major delivery trunk mains for both stages has commenced and is programmed for completion in mid 2011. Prior to the availability of drinking water, the recycled water system will be supplied via a cross link to the drinking water system. The location of a new cross link is yet to be determined.</p>	Noted.
SW 5	<p>1.3 Water for irrigation of open space/parklands</p> <p>Drinking water is to be used for the irrigation of open public space within the Edmondson Park South development area.</p>	Noted.
SW 6	<p>1.4 Wastewater</p> <p>Sydney Water's wastewater servicing strategy requires wastewater to be transferred off site through a pumping station in the south east of the Edmondson Park precinct. This approved strategy does not include the construction of any infrastructure through the Regional Park.</p> <p>Sydney Water has progressed the planning of the trunk wastewater infrastructure including options report, need specification for the whole precinct, and concept plan for the northeast catchment of the precinct.</p> <p>Landcom's proposed wastewater servicing strategy differs from Sydney Water's preferred option in that it requires the extension of a gravity trunk main from the Ash Road Carrier through the Regional Park. Sydney Water have advised Landcom that they need to prepare an options report and complete hydraulic modelling of the proposed wastewater strategy. Upon completion and assessment of this work by Sydney Water, Landcom may submit the detailed design for the proposed gravity wastewater system for review. The design will need to meet Sydney Water's requirements prior to approval.</p>	Noted. An options report and complete hydraulic modelling of the proposed wastewater strategy, prepared by J Wyndham Prince has been submitted to Sydney Water (refer to Appendix M of the Concept Plan PPR).

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
SW 7	<p>2. Approval for crossing of future Regional Park</p> <p>As Sydney Water is the long term owner of water, recycled water and wastewater infrastructure servicing the proposed development, Sydney Water will require access to all our assets for operational and maintenance purposes, including those traversing the future Regional Park. As such Sydney Water requires an agreement from the DECCW to an easement above the proposed wastewater main route across the Regional Park, for operational and maintenance purposes once ownership has been transferred from Landcom.</p>	<p>Noted. All necessary easements for utilities infrastructure including water, recycled water and wastewater infrastructure across the future Regional Park will be created by Defence under Commonwealth Approvals processes.</p>
SW 8	<p>3. State Significant site listing</p> <p>Sydney Water will need to provide additional water, wastewater and recycled water services to the Edmondson Park Precinct in the future. Listing of the proposed development area as a State Significant Site under Schedule 3 of the State Environmental Planning Policy (Major Development) 2005 by the Minister may impact on Sydney Water's ability to provide such services. Accordingly Sydney Water requests, that should the development area be included as a State Significant Site, provision be made for public utility undertakings to be carried out on any land within the site without consent, consistent with the provisions of the State Environmental Planning Policy (Infrastructure) 2007.</p>	<p>Notwithstanding the site's proposed State Significant Site Listing, State Environmental Planning Policy (Infrastructure) 2007 will continue to apply to Edmondson Park South (refer to Section 6.4 of the Concept Plan). In accordance with Clause 125(1) and (5) of the State Environmental Planning Policy (Infrastructure) 2007, development for the purpose of 'water reticulation systems' which includes 'water supply systems' are permissible on any land without consent.</p>
SW 9	<p>4. Funding of Infrastructure</p> <p>Landcom have commenced discussions with Sydney Water to enter into a commercial agreement to fund and construct the infrastructure required to service the proposed development. Under the commercial agreement Sydney Water will refund Landcom the full cost of the delivered infrastructure. Payment timing depends on how closely the works are aligned with Sydney Water's Growth Servicing Plan and the Metropolitan Development Program. The exact terms of the commercial agreement are yet to be determined.</p>	<p>Noted. Landcom will continue to work with Sydney Water in relation to funding of necessary infrastructure to service the development (refer to Statement of Commitment No. 39).</p>
NSW ROADS AND TRAFFIC AUTHORITY (letter dated 22 October 2010)		
RTA 1	<p>The RTA has reviewed the applications and provides the following comments:</p> <ol style="list-style-type: none"> Campbelltown Road will be upgraded to a four-lane divided carriageway in the medium term with a wide median to make provision for Campbelltown Road to be upgraded in the long term to a six-lane divided carriageway. This section of Campbelltown Road is to be designed for a 70 km/h design speed and sign posted with a 60km/h speed limit. 	<p>Landcom proposes that Campbelltown Road should be upgraded to a four-lane divided carriageway in the medium term with a kerbside parking lane / or widened footpath on both sides of Campbelltown Road to make provision for the road to be widened to a six-lane carriageway.</p> <p>Noted and have no issue with proposed speed 60 km/ h speed limit.</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
RTA 2	<p>Along the section of Campbelltown Road through Edmondson Park, the RTA requires a minimum 38.8 metre wide road reservation (excluding splays at the mouth of the intersections). However, if Transport NSW requires bus priority measures at the signalised intersections, the RTA requires a minimum 50 metre wide road reservation at the approach and departure of the signalised intersections.</p>	<p>The intersection modelling undertaken in the TMAP confirmed that the proposed cross-section of 38.8m (maximum) is adequate to cater for traffic forecasts beyond 2040 with up to three through lanes (with a shared left turn lane) and a single right turn lane at the intersection.</p> <p>Consultation with Transport NSW dated 29 July confirmed that Campbelltown Road is not expected to be a strategic bus corridor and no bus priority measures would be required on the Campbelltown Road approaches.</p> <p>Landcom has proposed that bus priority treatments can be implemented on the north-south approaches at the intersection of Campbelltown Road / Town Centre Main Street to facilitate efficient bus movements to and from the Station and the Town Centre.</p>
RTA 3	<p>The section of Campbelltown Road fronting the Edmondson Park development is to be constructed to RTA requirements and at no cost to the RTA.</p>	<p>The widening of Campbelltown Road fronting the Edmondson Park South development to a four-lane divided carriageway will be funded by the SIC levy</p>
RTA 4	<p>2. The RTA provides 'in principle' approval to the three signalised intersections along Campbelltown Road, between Zouch Road and Ingleburn Garden Drive and shall be designed and constructed to RTA requirements and at no cost to the RTA. All Campbelltown Road approaches to the proposed signalised intersections shall make provision for a single 100 metre long right turn storage bay and the intersections shall operate with double diamond overlap phasing.</p> <p>The developer will be required to enter into a Works Authorisation Deed with the RTA for the proposed signalised intersections. In this regard, the developer is required to submit detailed design plans and all relevant additional information, as may be required in the RTA's Works Authorisation Deed documentation, for each specific change to state road network for the RTA's assessment and final decision concerning the work.</p>	<p>Noted and agreed.</p>
RTA 5	<p>3. Prior to the determination of any development application for the Edmondson Park Town Centre, a master plan application shall be submitted to the consent authority and referred to the RTA for review and comment. This master plan application shall comprise a detailed Traffic and Transport Study and the Study shall include a micro-simulation model for the Town Centre.</p>	<p>Noted and agreed. The modelling methodology required for the detailed Traffic and Transport Study will be discussed with the RTA and other relevant agencies during the master planning stage of the Edmondson Park Town Centre. Refer to Statement of Commitment No. 11 regarding single integrated application.</p>
RTA 6	<p>In addition to the above, the RTA will not grant approval to any traffic signals within the Edmondson Park Town Centre unless it is demonstrated to RTA satisfaction that the warrants are met in accordance with Traffic Signal Design Manual.</p>	<p>The detailed Traffic and Transport Study for the Edmondson Park Town Centre will confirm the location and layout of intersections that would warrant traffic signals within the Town Centre in accordance with Traffic Signal Design Manual (where applicable).</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
RTA 7	<p>4. There is currently no timeframe established for the relocation of Macdonald Road to its ultimate location to form a four-way signalised intersection with Edmondson Park Station Access Road.</p> <p>In this regard, no additional stage of Edmondson Park shall be determined until such time that the trigger point for the relocation of McDonald Road to its ultimate location is determined. This will require the submission of detailed traffic analysis to RTA satisfaction.</p>	<p>It is expected Macdonald Road would remain on its current alignment until the access intersection at Macdonald Road for the development on the western side of Macdonald Road requires upgrading to traffic signals. The AECOM assessment shows that the access intersection will not require upgrading to traffic signals until the south western portion (south of Campbelltown Road and west of Macdonald Road) of the development is completed, i.e. approximately 550 lots. Based on a development rate of approximately 200 lots per year from 2012, Macdonald Road will not require relocation to its ultimate location until approximately 2014/15.</p> <p>A new Statement of Commitment in relation to the trigger point for the relocation of Macdonald Road is included at No. 27.</p>
RTA 8	<p>5. It is noted that some of the plans submitted illustrate a number of uncontrolled left in/left out intersections along Campbelltown Road, between Zouch Road and Ingleburn Garden Drive, which have not been approved by the RTA. The current practice of the RTA is to minimise the number of intersections along arterial roads on traffic efficiency and road safety grounds. Any additional intersection will be considered on its merits and shall be supported by traffic analysis to RTA satisfaction and is subject to concurrence from the RTA under Section 138 of the Roads Act, 1993.</p> <p>The RTA would consider left turn movements directly off Campbelltown Road at midblock locations more favourably if deceleration lanes were provided for these left turn movements.</p>	<p>There will be no uncontrolled left in/left out intersections along Campbelltown Road, between Zouch Road and Ingleburn Gardens Drive.</p>
RTA 9	<p>6. It is noted that the concept plans prepared by AECOM propose kerbside parking along Campbelltown Road. The RTA does not support kerbside parking along Campbelltown Road. In this regard a full time "No Stopping" restriction shall be implemented along this section of Campbelltown Road at no cost to the RTA.</p>	<p>Noted. Kerbside parking remains proposed along Campbelltown Road. The proposed kerbside parking on each side of Campbelltown Road provides the flexibility of adding an additional through lane of traffic in each direction should traffic flows warrant it in the long term future.</p> <p>In relation to signage, this is a detailed design issue and an adequate corridor has been provided to accommodate signage if required.</p> <p>Landcom will continue discussions with RTA and Transport NSW in relation to this aspect of the concept proposal.</p>
RTA 10	<p>7. It is noted that the proposed new intersection, north of Macdonald Road intersection, will be the main entry to the town centre. This intersection will be highly utilised by buses, cyclists and pedestrians. It is recommended that consideration be given to grade separation for pedestrians at this intersection to improve traffic safety and efficiency.</p>	<p>Noted. All three intersections proposed along Campbelltown Road will provide access to the town centre and will all be highly utilised by pedestrians and cyclists.</p> <p>The concept proposal does not provide grade separation. Grade separation is considered inappropriate for the proposed Edmondson Park Town Centre in that it would prioritise vehicular traffic over pedestrian access and would work against achieving an accessible, connected and transit-oriented urban development.</p>
RTA 11	<p>8. As Campbelltown Road is a major arterial road, it is requested that no new schools are located adjacent to Campbelltown Road on road safety grounds. If this is not possible then at a minimum no pedestrian and/or vehicular access shall be provided directly off Campbelltown Road on road safety grounds.</p>	<p>Noted. The concept proposal does not propose to locate any schools adjacent to Campbelltown Road.</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
RTA 12	<p>9. The proposed development shall be designed to achieve the required noise criteria for developments impacted by traffic noise through setbacks, site and architectural treatments. The planning instruments for this urban release area shall clearly state that noise walls are to be discouraged.</p> <p>Edmondson Park Precinct requires an acoustic report for any development adjacent to or on steep or elevated land within 100m of arterial and sub-arterial roads. The acoustic report is essential to ensure the internal comfort of residents and achieve desirable urban design and infrastructure cost outcomes.</p>	Noted. Future detailed applications will demonstrate compliance with the relevant noise criteria and will be accompanied by an acoustic assessment. Refer to updated noise assessment report included at Appendix I of the Concept Plan PPR and Statement of Commitment Nos. 83 and 84.
RTA 13	<p>10. The Statement of Heritage Impacts has not included the impacts of the minimum 38.8 metre wide road reservation along Campbelltown Road. This issue shall be satisfactorily addressed.</p>	<p>The proposed 38.8 m wide road reservation is a maximum road reservation width. The road reserve reduces to 34.5 m adjacent to the Ingleburn Military Heritage Precinct and Mont St Quentin Oval and entry gates. The proposed narrowing of the Campbelltown Road reserve between the Mont St Quentin Oval entry gates and the Ingleburn Military Heritage Precinct ensures the proposal has no impact on either of the heritage items.</p> <p>An assessment of the proposed Campbelltown Road reservation on existing heritage items is included at Section 6.3 (page 34) of the Statement of Heritage Impact, prepared by Tanner Architects and Section 8.6 of the EAR.</p>
LIVERPOOL COUNCIL (letter dated 1 November 2010)		
LC 1	<p>Urban Design</p> <p>It is envisaged that the works contained within this proposal will result in a well serviced and integrated community. The density is consistent with objectives for release areas, and over time the project will increase densities to take best advantage of the proposed Rail service through the Edmondson Park town centre. The delivery timeframe for the project is such that higher density products can be brought incrementally into the project to match the market demands.</p>	Noted and agreed.
LC 2	<p>Biodiversity</p> <p>The removal of vegetation in this case is supported as any losses are more than compensated by the provision of a regional park within the site. Further the site is included within the biodiversity certification for the South West Growth Centre.</p>	Noted and agreed.
LC 3	<p>Transport</p> <p>The project will take best advantage of the South West Rail Line, and provide linkages to public transport routes. It should be noted that the 60km/hr speed limit for Campbelltown Road, is considered to be an appropriate outcome for an area that in the future will become highly urbanised. The 60km/hr speed does not require as much width for this road, which means that heritage sites at the western extent of Edmondson Park can be retained.</p>	Noted and agreed.
LC 4	<p>Works through the Liverpool LGA</p> <p>In order to facilitate Stage 1 of this project, there are a number of works which are to be constructed within the Liverpool LGA. It is noted that these facilities such as the Sewer connection, are substantial costs to developers, and the provision of these trunk facilities may increase the viability of development of other landholdings in the northern part of the release area.</p>	Noted and agreed.

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
LC 5	<p>Provision of works and facilities</p> <p>Council have met with Landcom regarding this proposal, and understand that that Landcom intend to undertake works in kind and dedicate land to Council in lieu of Contributions Payments. Liverpool Council is supportive of this approach on the proviso that the extent of and detailed designs of the works are carried out in accordance with the Liverpool Contributions Plan – Edmondson Park and Council construction standards. Council is prepared to continue working with Landcom to ensure that the scope of works meets these standards and is delivered in a timely manner to match the development timeframes.</p>	Noted. Landcom has commenced negotiations with Liverpool Council in relation to the delivery of infrastructure.
LC 6	<p>Other considerations</p> <p>The report seems to adequately address impacts of heritage, water cycle, flood risk, bushfire protection, however a detailed assessment of these matters has not been undertaken as the main impacts of the proposal are well within Campbelltown LGA.</p> <p>As outlined in the application, the proposal has considerable direct and in-direct benefits to south western Sydney. As such Council is supportive of the proposal. Council will undertake to work with the proponents to deliver future stages of this project.</p>	Noted and agreed.
CAMPBELLTOWN COUNCIL (letter dated 29 October 2010)		
CC 1	<p>Council has also considered the Concept Plan and State Significant Site Study, which also covers Liverpool City Council boundaries, and establishes an overall planning framework for Edmondson Park South and proposes a mixed use residential, commercial and retail development, with a yield of approximately 3200 dwellings and up to 45,000sqm of retail/commercial floor space within the new Edmondson Park Town Centre. The Concept Plan also seeks to establish a Regional Park of approximately 150 hectares.</p>	Noted. As detailed at Section 2.2 of the PPR, the total proposed dwelling yield has been increased from 3,200 to 3,530 dwellings.

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
CC 2	<p>As far as land located within the Campbelltown Local Government Area, it is noted that the Concept Plan alters the existing zoning of the subject land in so far as:</p> <ul style="list-style-type: none"> ▪ The land currently zoned Special Uses 5(a) School would be rezoned to General Residential R1, ▪ The land currently zoned 6(c) Private Open Space adjoining the South Western Freeway would be rezoned to Environmental Living E4, ▪ Some land currently zoned 6(a) Local Open Space adjoining the South Western Freeway to Residential General R1 ▪ The land currently zoned 3(a) General Business will be rezoned to General Residential R1, ▪ The land currently zoned 3(c) Neighbourhood Business is to be rezoned General Residential R1, ▪ The alignment of MacDonald Road would be amended and zoned SP2 Infrastructure, ▪ The land which is the site of the Water Reservoir is to be zoned SP2 Infrastructure and it is noted that the site of the Reservoir is to be enlarged, ▪ The extent of land that makes up the western end of the Maxwells Creek open space corridor currently zoned 6(a) Local Open Space would be partly rezoned to General Residential R1, ▪ Some land adjoining the land currently zoned 3(c) Neighbourhood Business, to the east, would be rezoned to Public Recreation RE1, ▪ Land currently zoned 8(b) National Parks and Nature Reserve would be rezoned to Public Recreation RE1, ▪ Land currently zoned 6(a) Local Open Space would be rezoned to Public Recreation RE1, and ▪ Certain land located opposite the existing primary school fronting MacDonald Road would be rezoned from Residential 2(c) to Public Recreation RE1. <p>Council poses no objection to these proposed zoning changes excepting for the proposal affecting the existing strip of Private Open Space 6(c) zoned land that adjoins the South Western Freeway, and that area of land adjoining the Freeway currently zoned Local Open Space 6(a) proposed to be rezoned to Residential General R1. Council strongly objects to this proposal given that the intention of preserving this area as a vegetated strip (also incorporating the retention and enhancement of the memorial forest established by the ex-serviceman of the Ingleburn Army Camp) would be compromised. This matter is discussed in further detail later in this submission.</p>	<p>In relation to the proposed rezoning of the existing strip of Private Open Space 6(c) land that adjoins the South Western Freeway, it is noted that the Department of Defence (refer to letter dated 27 October 2010) raises no objection to the proposed rezoning of this land to Environmental Living E4.</p> <p>In accordance with LEP Practice Note PN 09-002, the E4 Environmental Living zone is intended to be applied to land with special environmental or scenic values, but at the same time accommodating low impact residential development. It is noted that the proposed E4 zone is supplemented by a detailed Statement of Commitment which will assist in the preservation of the Memorial Forest by ensuring that no structures are established within 37 to 45 metres of the site boundary to the Freeway reservation, and which will retain existing vegetation within private backyards where possible. This restriction can be made on title (refer to revised Statement of Commitment No. 16).</p> <p>Post approval of the concept plan, Landcom will prepare a DCS that will provide a single, integrated set of planning controls for the site. Landcom is committed to working with Campbelltown Council to address future design, construction and management of future uses within the proposed E4 Environmental Living zone that adjoins the South-Western Freeway (refer to Statement of Commitment No.10).</p> <p>It is considered that an E4 Environmental Living zone is more appropriate than a Private Open Space 6(c) or equivalent RE2 Private Recreation zoning, in that the underlying objective of this zone is intended to cover a wide range of recreation areas and facilities on land that are <u>privately owned or managed</u>. Mandated permissible uses include community facilities, recreation facilities (indoor and outdoor) and including squash courts, bowling alleys, golf courses, rifle range, lawn bowling greens and privately owned or managed recreation areas. It is considered that the most appropriate means of preserving the Memorial Forest is to apply a E4 residential zoning, which permits low density residential development with a built structure restriction on part of the land, arguably a less intensive use than those uses that are mandated permissible under a private open space / recreation zoning. No change to the proposed zoning of this land as set out in the SEPP Amendment is therefore proposed.</p> <p>It is not proposed to rezone any land zoned Local Open Space 6(a) to R1 General Residential as has been raised by the Council.</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
CC 3	<p>Draft Bardia Sub Precinct Development Control Plan</p> <p>Council has given regard to the Draft Bardia Sub Precinct Development Control Plan which is on public exhibition from 5 October 2010 to 3 November 2010. Council acknowledges that the Draft DCP has not been adopted by Council and strict statutory consideration cannot be given to it however it represents Council's most relevant non-statutory planning document relating to the planning framework of the Edmondson Park South area. Generally the proposal is consistent with the objectives and controls of the Draft DCP with some exceptions as detailed in this submission. Consideration is provided below of specific sections within the Draft DCP that are relevant to the proposal.</p>	<p>Noted. Landcom strongly supports the preparation of a draft Sub Precinct DCP for the Edmondson Park Precinct (which includes the site) and fully endorses the vision and development objectives within the document.</p> <p>Section 2.5 of the Concept Plan PPR sets out the manner in which the current draft version of the Bardia Sub-precinct DCP controls apply to the site.</p> <p>Landcom met with Campbelltown Council on 15 November 2010 to discuss the draft Bardia Sub-precinct DCP. Landcom is committed to working with Campbelltown Council to ensure that an appropriate development control framework is established for Edmondson Park South, which is not inconsistent with the aims and objectives of Council's draft DCP but still allows development to proceed on the site in accordance with the Edmondson Park South vision.</p> <p>Post approval of the concept plan, Landcom will prepare a Development Control Strategy (DCS) that will provide a single, integrated set of planning controls for the site (refer to new Statement of Commitment No. 10).</p>
CC 4	<p>a. Character Areas</p> <ul style="list-style-type: none"> ■ Village Centre ■ Urban ■ Urban Transition ■ Suburban ■ Residential Large Lot <p>The proposed Stage 1 subdivision layout has been assessed with the mapped character areas and is considered compliant. The subdivision primarily comprises 'sub urban' and 'large residential lot' character lots which are consistent with the nominated character location areas.</p> <p>Proposed Super Lot Nos.150-152 are identified as 'urban transition' and 'village centre' character lots and will ultimately be re-subdivided and developed to reflect the required character.</p>	Noted and agreed.

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
CC 5	<p>b. Access –Street Network, Types, Pedestrian Access and Cycleways</p> <p>The proposed street layout, cycleway and footpath links vary slightly from the Draft Bardia Sub-Precinct Development Control Plan, however, the variations to the street layout, and subsequent changes to the cycleways and footpaths is considered reasonable and upholds the objectives of the draft DCP. It is noted that the Concept Plan road pattern has been amended to improve connectivity with the east west aligned road system. Of particular note is the proposed road sited on the northern side of Maxwells Creek Riparian Corridor which is proposed to extend to Zouch Road and improve connectivity from east to west. Presently there is provision for only one neighbourhood connector road under the Draft Bardia DCP from east to west but the concept plan provides for two neighbourhood connector roads. This is supported by Council.</p> <p>Despite this however, there is a concerning difference between the Draft DCP and the concept plans in terms of the nominated road carriageway width for the roads nominated as "Local Roads (Minor)" – Roads 2, 3, 6, 7, 8, 10, 11, 13, 15, 16 & 17. The draft DCP shows for a "Local Street" a total carriageway width (kerb to kerb) of 9.0m whereas the plans included with the concept application and that included with the stage 1 application show for a Local Road (Minor), a total road carriageway width (kerb to kerb) of only 7.2m. Commentary in respect to the suitability of the 7.2m Local Road width has not been provided and no substantive reasoning or supporting documentation of a qualified nature has been provided that discusses the capacity of a 7.2m wide carriageway to adequately service the local traffic needs post development. Clarification and further discussion is required in this regard. Council is most concerned over this aspect and requires carriageway widths of an appropriate size.</p>	<p>Landcom has proposed local access streets have a carriageway width of 7.2m, this is consistent with the DCP standards in Liverpool's Edmondson Park DCP.</p> <p>Street carriageways should be of appropriate width to accommodate the vehicles that will use the street for travel and parking. Importantly, more width is not better than adequate width. 'In-between' dimensions are ambiguous and often lead to higher than appropriate vehicle speeds.</p> <p>Generally streets that will have development of housing or other uses on both sides should have parking on both sides, and a carriageway width of 7.2m where daily traffic volume will be less than about 2,000 vehicle movements. The Edmondson Park concept plan is well connected with a grid network of straight parallel streets.</p>
CC 6	<p>In addition to the above, the cycleway for Road 5 is not shown on the Concept / Stage 1 civil works plans. The cycleway is shown on the typical cross sections of the same plans.</p>	<p>Noted. The proposed cycleway for Road 5 will be shown on the Concept / Stage 1 civil works plan. Refer to Statement of Commitment No. 37.</p>

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CC 7	<p>c. Public Open Space</p> <p>Council has identified a number of areas where the proposal does not conform to the mapped public open space allocation under the Draft Bardia DCP.</p> <p>The most notable change to the distribution of open space within the Edmondson Park Precinct is the rezoning of a strip comprising both public and private open space along the sites boundary with the Hume Highway to 'Environmental Living' E4 and 'General Residential' R1. A detailed comment from Council in respect to this matter is provided in Section 2.0 of this submission which addresses concern for the successful environmental management of this land.</p>	<p>In relation to the proposed rezoning of the existing strip of Private Open Space 6(c) land that adjoins the South Western Freeway, it is noted that the Department of Defence (refer to letter dated 27 October 2010) raises no objection to the proposed rezoning of this land to Environmental Living E4.</p> <p>The E4 Environmental Living is intended to be applied to land with special environmental or scenic values, but at the same time accommodating low impact residential development. It is noted that the proposed E4 zone is supplemented by a detailed Statement of Commitment which will assist in the preservation of the Memorial Forest which will ensure that no structures are established within 37 to 45 metres of the site boundary to the Freeway reservation, and which will retain existing vegetation within private backyards where possible". This restriction can be made on title (refer to revised Statement of Commitment No. 16).</p> <p>This approach is consistent with LEP Practice Note PN 09-002.</p> <p>Post approval of the concept plan, Landcom will prepare a DCS that will provide a single, integrated set of planning controls for the site. Landcom is committed to working with Campbelltown Council to address future design, construction and management of future uses within the proposed E4 Environmental Living zone that adjoins the South-Western Freeway.</p> <p>It is considered that an E4 Environmental Living zone is more appropriate than a Private Open Space 6(c) or equivalent RE2 Private Recreation zoning, in that the underlying objective of this zone is intended to cover a wide range of recreation areas and facilities on land that are <u>privately owned or managed</u>. It is considered that the most appropriate means of preserving the Memorial Forest is to apply a E4 residential zoning, which permits low density residential development with a built structure restriction on part of the land, arguably a less intensive use than a mandated permissible under a private open space / recreation zoning.</p> <p>No change to the proposed zoning of this land as set out in the SEPP Amendment is proposed.</p> <p>It is not proposed to rezone any land zoned Local Open Space 6(a) to R1 General Residential.</p>
CC 8	<p>Council notes that the Concept Plan application proposes to reduce the length of the Maxwells Creek Open Space corridor given it does not extend as far west as is shown on the Draft Bardia Precinct DCP riparian corridor mapping. It appears that possibly the equivalent open space area (square metres) has been relocated and re-orientated north-south and is directly adjacent to the south east side of Mont St Quentin Oval. In this respect it is noted that the Stage 1A plan of subdivision proposes the creation of a conservation area public reserve (Proposed Lot 1) on the western side of proposed Lot 34 which does not appear to be nominated under the Draft Bardia DCP. Notwithstanding, Council accepts this variation.</p>	<p>Noted and agreed.</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
CC 9	<p>Council also notes that the western end of the riparian corridor link from Chowne Road to the eastern boundary of the nominated school site has been marginally amended. Under the Draft Bardia DCP, the corridor maintains the same width to the extent of the school boundary</p> <p>However under the Concept Plan, the corridor has been extended to adjoin almost the entire eastern boundary of the school site and provides a linkage to an east-west aligned road fronting the southern side of the school site. The extension is supported on the basis of improved pedestrian connectivity from the school site to the Maxwells Creek South Conservation Area.</p>	Noted and agreed.
CC 10	<p>d. Subdivision Densities</p> <p>The proposed Stage 1 subdivision is generally compliant with the minimum relevant subdivision density requirements under the provisions of the Draft Bardia Sub Precinct Development Control Plan.</p> <ul style="list-style-type: none"> ▪ Village Centre: 17 dwellings/ha ▪ Urban: 28 dwellings/ha ▪ Urban Transition: 17 dwellings/ha ▪ Suburban: 14 dwellings/ha ▪ Residential Large Lot: 1 ha minimum lot size 	Noted and agreed.
CC 11	It is noted that proposed Lot 4 in the Stage 1 subdivision appears to be restricted in size with an area of 281.5sqm given its corner location. It is recommended that the applicant be required to increase the area of the allotment to comply with the Draft DCP.	Noted. Proposed Lot 4 in the Stage 1 subdivision has been adjusted. Amended Subdivision Plans are included at Appendix B of the Stage 1 PPR.
CC 12	Council has reviewed the proposed allotment sizes of which the configurations are considered to generally comply with the objectives and controls of the Draft Bardia DCP.	Noted and agreed.
CC 13	Importantly however, the Draft Bardia DCP requires that allotments with a proposed area of less than 450 square metres be treated as integrated housing. This does not appear to have been taken into consideration by the Stage 1 subdivision plan. Accordingly, Council can only accept allotments with an area of less than 450 square metres in circumstances where they are accompanied by appropriately designed and sited building envelopes, protected by relevant restrictions as to user provisions. This information has not been provided.	Landcom has committed to preparation of a consolidated Development Control Strategy (DCS) to guide the assessment of future detailed development within the framework of the approved Concept Plan. The DCS will compile into a single consolidated document all of the existing development controls under Liverpool DCP 2008 and Campbelltown Council's Draft Bardia Sub-Precinct Development Control Plan which are proposed to apply to land uses or activities within Edmondson Park South. In addition, the DCS will incorporate new development controls for residential development on small lots. It is proposed that these controls be finalised in consultation with both Liverpool and Campbelltown Council's and submitted to the Director General of the Department of Planning prior to lodgement of any future subdivision application (refer to Statement of Commitment No. 10).

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
CC 14	<p>2. Environmental Management and Assessment</p> <p>Council has undertaken a detailed environmental assessment of the proposal and provides the following comments.</p> <p>Open Space / Vegetation Areas of Open Space within the Edmondson Park Precinct have been reconfigured in light of the Regional Park boundary adjustment and to offset the loss of existing native vegetation (ENV) associated with the construction of the sewer main and the implementation of the Remediation Action Plan within non-certified areas. This reconfiguration will result in the retention of 4.2ha [4.36 ha] of previously certified ENV to ameliorate the loss of 1.8 ha of non-certified ENV.</p>	Noted and agreed.
CC 15	In addition, a further 9ha of land will be revegetated to Cumberland Plain Woodland within Edmondson Park south to further offset the loss on ENV within non-certified areas. In this regard, Eco Logical Australia's conclusion that the proposed concept plan satisfies the requirements of the Biodiversity Certification Order and the Biodiversity Conservation Agreement is supported.	Noted and agreed. The 9 ha of cleared land is required to be revegetated under the Commonwealth Conservation Agreement.
CC 16	As previously stated, it is noted that one of the changes to the distribution of open space within the Edmondson Park Precinct is the rezoning of a strip comprising both public and private open space along the boundary with the Hume Highway to Environmental Living E4 and General Residential R1. Council would reiterate its objection to this proposed change in zoning. The technical reports advise that this rezoning will occur in association with appropriate 'development controls' (refer to page 152 of the State Significant Site Study and Environmental Assessment Report, page 37 of the Concept Plan Ecological Assessment Report and page 27 of the Stage 1 Ecological Assessment Report).	Refer to above comment in relation to Section 1(c) – public open space.

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
CC 17	<p>The following comments are provided in relation to this proposal:</p> <ol style="list-style-type: none"> 1. It is considered that clarification is required as to what types of development controls will be developed for the Environmental Living and General Residential zone and whether such controls will form part of or be consistent with the SEPP (Growth Centres) 2006 or the Bardia Sub-Precinct Development Control Plan. 2. Section 9.0 of the State Significant Site Listing and Concept Plan outlines Draft Statements of Commitment. These Statements include the following in relation to the area that will be rezoned for Environmental Living purposes: <ol style="list-style-type: none"> a. The detailed design of development on slopes within the E4 Environmental Living Zone in the south-western portion of the Edmondson Park South site will retain existing scattered trees where possible, and establish new tree canopy to assist in the screening of new housing in this location. The detailed design of future built form will provide, side, front and rear setbacks and landscaped area that will consider the visual prominence of this location. b. The detailed design of development in the E4 Environmental Living Zone along the South Western Freeway Edge of the site will ensure that no habitable structures are established within 30 metres of the site boundary to the Freeway reservation, and will retain existing vegetation within private backyards where possible. <p>These commitments are a long way from achieving the vegetation strip and landscape screen that is proposed under the Draft Bardia Sub-Precinct Development Control Plan, and are not sufficient. The Draft DCP was proposing the following outcomes for these areas of open space:</p> <ol style="list-style-type: none"> 3. The park (Maxwells Creek South Riparian Park) should be revegetated and regenerated with native vegetation. Where it abuts the M5 Motorway this Park must be densely planted for the first 100 metres from the motorway (refer page 35 of the Draft DCP). 4. The locality (Private Open Space) includes a 50 metre landscaped strip, east of McDonald Road that will continue the Memorial Forest planted along the M5 Motorway. This area shall be regenerated with endemic vegetation. <p>Such controls would have assisted with the protection of the Memorial Forest and any remnant native vegetation which occurs within this locality, as would the management of this area as both public and private open space.</p> <p>It is important to note that some years ago certain ex-servicemen from World War 2 initiated the planting of trees, characteristic of shale plains woodland along the F5 Freeway, within the Edmondson Park Urban Release Area, with the help of students from the North Ingleburn Primary School. Its purpose was to create a Memorial Forest similar to that along the Hume Highway between Sydney and Canberra. Council has always been very supportive of the ex-servicemen's initiative with regard to this Memorial Forest, and would be very concerned if its integrity was likely to be compromised by any future residential development.</p>	<p>In relation to the proposed rezoning of the existing strip of Private Open Space 6(c) land that adjoins the South Western Freeway, it is noted that the Department of Defence (refer to letter dated 27 October 2010) raises no objection to the proposed rezoning of this land to Environmental Living E4.</p> <p>The E4 Environmental Living is intended to be applied to land with special environmental or scenic values, but at the same time accommodating low impact residential development, consistent with LEP Practice Note PN 09-002.</p> <p>It is considered that an E4 Environmental Living zone is more appropriate than a Private Open Space 6(c) or equivalent RE2 Private Recreation zoning, in that the underlying objective of private open space / recreation zones is intended to facilitate a wide range of recreation areas and facilities on land that are privately owned or managed.</p> <p>Mandated permissible uses in these zones (under the Standard LEP template) include community facilities, recreation facilities (indoor and outdoor) including squash courts, bowling alleys, golf courses, rifle range, lawn bowling greens and privately owned or managed recreation areas. It is considered that the most appropriate means of preserving the Memorial Forest is to apply a E4 residential zoning, which permits low density residential development with a built structure restriction on part of the land. Residential uses are arguably a less intensive use than a mandated permissible use under a private open space / recreation zoning.</p> <p>It is noted that the proposed E4 zone is supplemented by a detailed Statement of Commitment which will assist in the preservation of the Memorial Forest and which will ensure that no structures are established within 37 to 45 metres of the site boundary to the Freeway reservation, and which will retain existing vegetation within private backyards where possible. This restriction will be made on title (refer to revised Statement of Commitment No. 16).</p> <p>On the above basis, no change to the proposed zoning of this land as set out in the SEPP Amendment is proposed.</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
CC 18	<p>Environmental Living Purposes Lots Council raises concerns that the rezoning of this area to Environmental Living and General Residential purposes will impact upon the future viability and retention of the proposed vegetation screen, as the management of vegetation would become the responsibility of an excessive number of private landowners. This arrangement would put at risk the integrity and longevity of the vegetative screening and Council considers the resulting outcome as untenable. In addition, vegetation will need to be removed in order to erect property boundary fences. Of particular concern are the proposed 52 residential allotments of approximately 1,000 square metres in area with an average width of what would appear to be approximately 13.5metres. Council had anticipated only 18 allotments with a width of 40 metres each under the current zoning of part Private Open Space and part Residential. This outcome is unacceptable to Council.</p>	<p>The proposed rezoning of this land to E4 Environmental Living is considered the most appropriate zone to ensure protection of vegetation within the Memorial Forest (refer to discussion at Section 2.7 of the Concept Plan PPR and Statement of Commitment No. 16 of the Concept Plan PPR).</p>
CC 19	<p>Landscape Plan / Vegetation Cover - Riparian Zones Clarification is required as to whether the landscape plan which accompanies the Stage 1 Environmental Assessment report accurately depicts the desired final extent of vegetation cover and the location of the detention basins or whether the figures in this plan are simply concept plans.</p>	<p>The landscape concept plan, prepared by Hassell and included at Appendix B of the Stage 1 Project Application is a concept plan. A detailed landscape plan will be prepared and submitted to the Department of Planning and Campbelltown Council (a Statement of Commitment will be included in the Stage 1 Project Application PPR to this affect).</p>
CC 20	<p>Bushfire Hazard Assessment The use of perimeter roads as the Asset Protection zone is the preferred option for Council as it minimises the future maintenance work required by Council.</p> <p>The Edmondson Park South Stage 1 Bushfire Risk Assessment has considered the Planning for Bushfire Protection 2006 document, and its requirements within the Risk Management Plan should be reviewed in light of the development proposal and the Committee should be informed of these matters.</p>	<p>The NSW Rural Fire Service (refer to letter dated 20 October 2010) has reviewed the Stage 1 Project Application. Proposed perimeter roads will allow for two way traffic and the paved width kerb to kerb will be a minimum of 8 m.</p>
CC 21	<p>Heritage With respect to potential heritage impacts, there are two (2) listed heritage items (LEP 2002) associated with the Ingleburn Army Camp within the Edmondson Park Release Area. It is noted that there are no heritage items located within Stage 1.</p> <p>A Heritage Impact Statement has been prepared to support the project and State Significant Site Study which appears to adequately evaluate the impacts of the heritage significance of the site, and make suitable recommendations to conserve the European (Ingleburn Army Camp) and aboriginal heritage significance of the site.</p>	<p>Noted.</p>
CC 22	<p>a. European Heritage</p> <p>Mess Hall, Ingleburn Army Camp - LEP 2002</p> <p>Comment: The Mess Hall is proposed to be demolished in accordance with separate Commonwealth processes. In this respect it is noted that this demolition does not form part of the subject concept plan application.</p>	<p>Noted and agreed. The Mess Hall, Ingleburn Army Camp is not proposed for retention as heritage items as part of the SEPP Amendment on the basis that this item is be demolished by Defence under Commonwealth approval processes.</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
CC 23	<p>Mont St Quentin Oval - LEP 2002</p> <p>Comment: The recognised heritage features comprising the oval, entry gates and flagpole are proposed to be retained as part of the concept plan, and and refurbished within a new district park. Appropriate curtilages and development controls are proposed to protect the setting of the military precinct and oval from surrounding development.</p>	Noted and agreed.
CC 24	<p>b. Aboriginal Heritage</p> <p>Consultation has occurred by Landcom with Local Aboriginal Land Councils (Tharawal and Gundangara) in accordance with the DG and DECCW requirements. An Aboriginal Cultural Heritage Assessment has been undertaken by Kelleher Nightingale Consulting P/L. This report appears to adequately assess the aboriginal cultural heritage values of the site and the potential impacts of the proposed development on aboriginal cultural heritage.</p>	Noted and agreed.
CC 25	<p>It is noted that thirty archaeological sites have been recorded within the Concept Plan Area (11 sites of moderate to high significance), less within Stage 1. Those sites to be impacted upon are to be ameliorated by a raft of proposed measures, including salvage, collection and continued consultation with aboriginal stakeholders.</p> <p>The Part 3A Concept Plan for Edmondson Park South appears to comply with relevant statutory requirements for heritage impact and assessment - namely the Heritage Act 1977, DGR's Requirements including the assessment of guidelines published by the NSW Heritage Office, DECCW requirements and compliance with Campbelltown (Urban Area) LEP 2002. Subject to the commitments made by the proponent to manage and mitigate the potential impacts on European and Aboriginal heritage within the site, no objection is raised to the project on the basis of heritage considerations.</p>	Noted and agreed. Statement of Commitments Nos.45 - 52 will ensure the appropriate management of cultural and archaeological heritage on the site.

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
CC 26	<p>Street and Open Space Landscaping</p> <p>Council has reviewed the indicative street and open space landscaping plans and supporting documents and considers that the various species listed within the “Preliminary Plant Schedule” requires amending. The tree species listed under the heading “Feature Trees” starting from the Hoop Pine and through to the Brush Box are not considered appropriate for the planting within road areas. Similar to this, other than for the Melaleuca, none of the tree species listed under the heading “Native Trees” are considered appropriate for the planting within road reserves. These tree species should be identified as species to be used within open space areas in which they would have a far better chance of reaching their respective mature growing potential.</p> <p>The following list of trees should be considered as substitute trees species for planting within road reserves:</p> <ul style="list-style-type: none"> • Hymenosporum flavum - Native Frangipanni • Elaeocarpus reticulates - Blue Berry Ash • Callistemon salignus - Willow Bottlebrush • Pyrus calleryana - Ornamental Pear – “Capital” or “Fronzam Frontier” • Gordonia axillaris - Fried Egg tree • Lagerstroemia x fauriei - Crepe Myrtle - “Biloxi”, “Natchez” or “Tuscarora” <p>It is expected that further detail will be provided with the application for the construction certificate for stage 1, at which time, a more detailed assessment will be undertaken and advice in respect to the required street tree species will be provided.</p>	<p>Noted. The preliminary plant schedule submitted as part of the Landscape Concept at Appendix B of the Stage 1 Project Application will be updated to reflect Council’s preferred tree species for planting within road reserves. A Statement of Commitment to this affect will be included in the Stage 1 Project Application PPR.</p> <p>A detailed landscape plan will be submitted to Council prior to the commencement of landscape works (refer to Statement of Commitment No. 20 of the Stage 1 PPR).</p>
CC 27	<p>Geotechnical Elements</p> <p>The works undertaken to date are preliminary and Council recommends that additional investigations be undertaken at the time of detailed design to confirm preliminary assessments.</p> <p>The recommendation to manage potential slope instability should be expanded to include reference to the “Practice Note Guideline for Landslide Risk Management” (Australian Geomechanics, Vol 42, No 1, 2007).</p> <p>It is recommend that additional discussion of the management of development in areas of deep uncontrolled fills be expanded.</p>	<p>Noted. Refer to Statement of Commitment No. 14 of the Stage 1 PPR.</p>

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
CC 28	The Concept Plan Site Suitability Assessment and Stage 1 Project Application identified the expected extent of cut and fill required to achieve the proposed development, by way of the Stage 1 Project Application including a plan of proposed cut and fill and discussion of likely fill material types and sources. The Concept Plan and Project Application Requirements require a report showing quantities of fill necessary for site preparation works and strategies to minimise excavation works, both for site preparation works and individual dwellings. These items have not been reported and it is recommended that the Stage 1 Project Application be amended to include quantities of fill necessary for site preparation works and strategies to minimise excavation works, both for site preparation works and individual dwellings.	Information in relation to the quantities of fill necessary for site preparation works have been provided in the Stage 1 Project Application. Strategies to minimise excavation works will be provided as part of the Stage 1 Preferred Project Report.
CC 29	With regard to the Golder Associates Figure 4 – Geology, it is noted that the sandstone encountered within some of the test pits and boreholes is shown as covering significant areas with inferred strata thickness of greater than 20 metres in places. This plan may not be an accurate representation of the site geology in these areas because the “outcrops” shown are inconsistent with the geological deposition process. Furthermore, the unusual presence of the sandstone within an area of Bringelly Shale has not been discussed in detail. Whilst the Bringelly Shale is known to contain sandstone, it is considered that these unusual features warrant more detailed explanation in the documentation.	Noted. A more detailed discussion in relation to the presence of sandstone within the area of Bringelly Shale will be prepared as part of the detailed investigations required as per Golder Associates report included at Appendix K of the Stage 1 Project Application (a revised Statement of Commitment will be included as part of the Stage 1 Project Application).
CC 30	Contamination and UXO Issues Based on the documents provided, Council concurs with Golder that the Landcom site is considered suitable for the proposed redevelopment subject to the conditions listed in Section 4.1. It is also considered that there is a low probability of unidentified contamination being encountered.	Noted and agreed. Refer to Statement of Commitment No. 16 of the Stage 1 PPR.
CC 31	Based on the documents provided, Council accepts that the Defence site should be suitable for its proposed end use subject to the conditions listed in Section 4.2. However, it is considered that there is more uncertainty in respect of the extent and degree of remaining contamination (and remediation required) at the Defence Site relative to the Landcom Site based on the limited information available at the time of this review, particularly in respect of the former incinerators present on site.	Noted. Defence is currently undertaking remediation works on the Ingleburn site and these are expected to be completed by mid-November 2010. It is Defence's intention to obtain a Section A Site Audit Statement and Site Audit Report under the Contaminated Land Management Act 1997 confirming that all land on the site is suitable for its intended end use; this should be available in February 2011 (refer to letter dated 25 October 2010).
CC 32	Water Cycle Management In general the strategy is considered acceptable, however, concern is raised in respect to the lack of information regarding flooding. It is accepted that the detail design work is currently underway and drainage calculations and philosophies will be presented to Council shortly, however, the need to further develop the concept of the regional detention basins and rain garden treatment areas while giving regard to both compliance with relevant policy and the needs and capacity of Council in terms of maintenance and long term management of the various devices, is of the highest importance. In this regard, it is critical that Council be required to sign off on all proposed civil infrastructure prior to the issue of the construction certificate for those works or a separate construction certificate for works that rely on the relevant infrastructure.	Noted this is a matter for detailed design stages.

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
CC 33	<p>Transport Management and Accessibility</p> <p>In general, Council agree with the overall concept plan outline for developing Edmondson Park South. However, it is considered that the TMAP does not provide a qualified justification for selecting the proposed concept transport network plans or a clear understanding of the likely precinct related impacts from the proposed staging. It is understood that the concept transport network plans follow a recommended network structure that is presented in the Draft Bardia Sub-Precinct Development Control Plan (DCP). Although this is the latest structure, the DCP is still a draft document and the TMAP appears to have missed the opportunity to demonstrate that, along with supporting in principle the high level objectives set by State Government guidelines and planning, it also provides an optimum arrangement against all other tested options.</p> <p>It is difficult to judge if the concept transport network plan selected provides optimum infrastructure outcomes or if it presents the most advantageous performance target outcome for stakeholders. This inconsistency needs to be addressed.</p>	<p>It is noted that the concept transport network plans are consistent with the recommended network structure that is presented in the Draft Bardia Sub-Precinct DCP. Council in exhibiting the Draft Bardia Sub-Precinct DCP must have formed the opinion that the transport network structure shown in this DCP was acceptable.</p> <p>The proposed road network, sustainable travel strategy, public transport and walking and cycling network as set out in the Concept Plan and Stage 1 Project Application represents an optimum arrangement, consistent with high level objectives set by State Government.</p>
CC 34	<p>Infrastructure Delivery Strategy</p> <p>The Concept Plan and Stage 1 Project Application documents are currently very similar in content. The Concept Plan should relate specifically to the entire development and the Stage 1 Project Application to Stage 1 only. However, there are specific references to Stage 1 in the Concept Plan and the Stage 1 Project Application does not contain much further detail in relation to Stage 1 servicing (apart from generic references to required reticulation works). There are a number of references within the Concept Plan document that seem to relate to the Stage 1 Project Application.</p> <p>More information on the proposed services, including an indication on the typical road cross sections for the Stage 1 works should be provided (not currently indicated on the typical road cross sections provided with the Part 3A Application). There is some uncertainty as to whether the road verge widths area is sufficient to accommodate all the services proposed for the development (i.e. potable water, recycled water, electricity, telecommunications and gas).</p>	<p>Footpath widths are adequate for the provision of services in accordance with current practice which generally requires a minimum 3 m wide footpath.</p>

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CC 35	<p>Noise and Vibration Impacts A review of the noise and vibration impacts for the project revealed a number of areas in both the Concept Plan and the Stage 1 Project Application documents that require further clarification, including:</p> <ul style="list-style-type: none"> a. Ambient Noise Levels <ol style="list-style-type: none"> 1. The report does not specify whether the noise data was filtered against concurrent weather data (wind speed and rain) and how this may have affected the noise monitoring results. 2. Noise data gathered prior to 19 July was taken within school holidays. The report should discuss how noise levels may be affected (in particular with regards to modified traffic flows) and justify if this data is valid. 	<p>A Supplementary Noise Assessment, prepared by Wilkinson Murray is included at Appendix I.</p> <p>In relation to ambient noise levels:</p> <ul style="list-style-type: none"> ▪ weather conditions were suitable for noise measurements with the exception of Sunday 26 July when rain occurred. This period was excluded in accordance with DECCW procedures. Periods of exclusion are shown in the noise plots in the Appendices where the excluded periods are shown in grey. ▪ Friday the 19 July is the last day of the school holidays. The majority of noise logging was conducted during normal work periods and weekends. ▪ The results of individual daily traffic noise levels were reviewed and no significant change in traffic noise levels, that influenced presented results, is indicated. Further, given the high traffic flows on the motorway any change in traffic flow as a result of holidays is likely to be acoustically insignificant.

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
	<p>b. Noise and Vibration Criteria</p> <ol style="list-style-type: none"> 1. The three noise logging locations are concentrated in the southern portion of the site. As a result, the background noise levels and derived construction noise limits may not be representative of receivers located in the northern area of the site. 2. Table 4-4 offers an interpretation of external rail and road noise criteria, which is not explicitly supported by the Department of Planning Development Near Rail Corridors and Busy Roads – Interim Guideline. <ol style="list-style-type: none"> a. For road noise, it would be more appropriate to refer to the Department of Environment, Climate Change and Water (DECCW) Environmental Criteria for Road Traffic Noise to address external criteria and the requirements for ventilation. 	<ul style="list-style-type: none"> ■ The assessment of construction noise was conducted against noise objectives based on the project application for the Stage 1 application only. The construction noise objectives for this site are based on background noise levels measured in the southern area. ■ It is acknowledged that the background noise levels at the northern end of the site have not been measured. As no construction noise assessment of the northern area of the development has been conducted it is envisaged that additional ambient noise monitoring will be conducted at the northern end of the site when project applications are submitted in the future. These measurements will confirm site specific construction noise objectives for these areas. ■ The “Department of Planning Development Near Rail Corridors and Busy Roads – Interim Guideline”, provides guidance on the application of the State Infrastructure SEPP. This SEPP has been gazetted and is a mandatory requirement by law. Therefore compliance with the internal noise criteria and associated ventilation requirements of this SEPP is applicable to the development. ■ It is noted that the addition of 10 dB to determine an equivalent windows open external noise criteria is consistent with the ECTRN. ■ In the case of ventilation the ECRTN does not specify criteria for ventilation however Section 3.6 of the SEPP Guideline states “If internal noise levels with windows or doors open exceed the criteria by more than 10dBA, the design of the ventilation for these rooms should be such that occupants can leave windows closed, if they so desire, and also to meet the ventilation requirements of the Building Code of Australia”. It should be noted that the ventilation criteria presented in Table 4-4 is external noise criteria. ■ Therefore the criteria presented in Table 4-4 are considered applicable to the site.
	<p>b. For rail noise, the noise objectives outlined in RailCorp Environment Protection Licence (EPL 12208) could be referred to.</p>	<ul style="list-style-type: none"> ■ As with road noise, the criteria of the Infrastructure SEPP are applicable for receivers potentially affected by future rail noise. ■ The Railcorp EPL 12208 is applied to the operator of the railway line, not surrounding receivers. It is also noted that these licence conditions are not consistent with the Interim Guideline for the Assessment of Noise from Rail Infrastructure Projects (IGANRIP) criteria upon which the Environmental Assessment for the SWRL was based.

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
	<p>3. Section 4.4 of the report outlines a rail vibration criterion of 108dBA re 10-9 m/sec based on the findings of the South West Rail Link Environmental Assessment (SWRL EA). As it is unusual to apply the A-weighting network to rail vibration levels, and as such, it is assumed that this is a typographic error and the limit should read 108dB re 10-9 m/sec. Regardless, Development Near Rail Corridors and Busy Roads – Interim Guideline states the following:</p> <p>a. “Vibration levels such as the intermittent vibration emitted by trains should comply with the criteria in Assessing Vibration: a technical guideline (DECC 2006). The standards used for assessing the risk of vibration damage to structures are German Standard DIN 4150 Part 3 1999 and British Standard BS 7385 Part 2 1993. Human comfort is normally assessed with reference to the above British Standard or Australian Standard AS 2670.2 1990”.</p> <p>Therefore it is recommended that the rail vibration criteria be revised accordingly.</p>	<ul style="list-style-type: none"> ▪ The EA technical paper, prepared by Heggies, on rail noise and vibration for the SWRL has been reviewed by us to determine if the impact of rail vibration is likely be acceptable with respect to the amenity of occupants of developments adjacent to the rail corridor. ▪ Wilkinson Murray is in general agreement with the findings of Heggies in their assessment. This agreement is predicated on the predictions of Heggies being correct. ▪ The criterion of 108 dB re 10-9 m/sec has been proposed by Heggies based with some reference to the IGANRIP VDV criteria which also references AS2670. This is consistent with the council recommendations above.
CC 36	<p>c. Road Noise Impacts</p> <p>The report should outline the origin of the traffic data used in the modelling. It should also discuss whether the topographic contours include the earthworks associated with the widening of the motorway.</p> <p>It should be noted that split source heights should be considered where the percentage of heavy vehicles exceed 10 per cent to account for heavy vehicle exhaust noise. This may not be feasible using CoRTN and the report does not provide details on this issue.</p>	<p>A Supplementary Noise Assessment, prepared by Wilkinson Murray is included at Appendix I of the Concept Plan PPR.</p> <ul style="list-style-type: none"> ▪ Traffic data is based on data provided the project traffic consultant, AECOM. ▪ The noise modelling using CoRTN split traffic into cars and heavy vehicles. The heavy vehicles were modelled using 2 source heights one at 1.5 m for the engine/wheels and one at 3.6 m for the exhaust.
	<p>NSW DEPARTMENT OF EDUCATION AND TRAINING (letter dated 27 October 2010)</p>	
DET 1	<p>The Department’s Service Planning and Sites Officers met with Landcom staff on a number of occasions at our offices in Bridge Street and on site at Edmondson Park. Discussions included consideration regarding alternative school site locations.</p>	

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
DET 2	<p>This extended consultation process has resulted in positive outcomes for the Department and may resolve a number of site issues. The Department supports the revised Concept Plan of 27 August which illustrates the following:</p> <ul style="list-style-type: none"> ▪ Retention and expansion of the Ingleburn North Public School site to around three hectares; and ▪ A nine hectare combined primary / high school site adjacent to the Edmondson Park Town Centre, near the proposed South West Rail line. Refer Attachment 1. <p>As a consequence of the amended locations, the Department of Education and Training wishes to relinquish interest in previously identified sites that had been gazetted Special Uses (schools) namely:</p> <ul style="list-style-type: none"> ▪ Primary school site identified adjacent to Jardine Drive, ▪ Primary school site identified to the west of Macdonald Road, ▪ High school site identified on Defence land off Campbelltown Road. <p>Please note that the Department wishes to retain interest in the primary school site in Croatia Avenue, Liverpool LGA.</p> <p>In addition to the condition referring to the land use zoning above, the Department also request adherence to the Growth Centre's <i>Special Infrastructure Contributions Guidelines</i>.</p>	Noted.
NSW Transport Construction Authority (letter dated 25 October 2010)		
TCA 1	TCA is supportive of the development of the Edmondson Park Precinct and is keen to ensure that the development is fully integrated with the South West Rail Link (SWRL) Glenfield to Leppington Rail Line project and in particular Edmondson Park Station and the proposed rail crossings.	Noted.
TCA 2	<p><u>General Comments</u></p> <ul style="list-style-type: none"> ▪ TCA requests that Landcom commit to continuing to work with TCA to facilitate the integration of the SWRL project with the proposed development. These should essentially be captured in Statement of Commitments that require Landcom to consult with TCA regarding the provision of utilities, regrading of land near the station and land uses adjacent to the corridor. 	Noted. Landcom will continue to work with TCA to facilitate the integration of the SWRL project with the proposed development and will consult with TCA regarding the provision of utilities, regrading of land near the station and land uses adjacent to the corridor (refer to Statement of Commitment No. 85).
TCA 3	<ul style="list-style-type: none"> ▪ TCA requests that Landcom refer to the Heads of Agreement that has been developed with TCA, including a recognition that parts of the Department of Defence land will be transferred to the NSW government for the purposes of the rail corridor and associated interchange and substation uses. This should include a recognition of appropriate zonings. 	The Heads of Agreement is a commercial agreement between Landcom and TCA and is not a matter for consideration under the EP&A Act.
TCA 4	<ul style="list-style-type: none"> ▪ TCA is currently in negotiation with Landcom on the option to provide a rail traction substation on the north side of the town centre adjacent to the SWRL corridor. This site has not been assessed, which TCA will undertake in consultation with Landcom following SWRL project approval. 	Noted. Landcom will continue to work with TCA to facilitate the provision of a rail traction substation on the north side of the town centre within the SWRL corridor. It is noted that in accordance with Clause 41(1) and (2) of State Environmental Planning Policy (Infrastructure) 2007, development for the purpose of an 'electricity transmission or distribution network' which includes the establishment of a new substation, may be carried out by or on behalf of an electricity supply authority or public authority without consent on any land.

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
TCA 5	<ul style="list-style-type: none"> TCA is currently discussing with Landcom options to connect the proposed Edmondson Park Station to the sewer system and this needs to be stated in the Submissions Report. 	Noted. Landcom will continue to work with TCA to discussion options to connect the proposed Edmondson Park Station to the sewer system.
TCA 6	<ul style="list-style-type: none"> TCA is currently in discussion with Landcom regarding the option to use land on Zouch Road as part of the SWRL Biodiversity offsets strategy. This also needs to be stated in the Submissions Report as it may potentially change the proposed land uses in this part of the precinct. 	No agreement between Landcom and TCA is in place regarding the option to use land on Zouch Road as part of the SWRL Biodiversity offsets strategy. This is a matter for TCA to resolve as part of the SWRL Environmental Assessment and is not relevant to this application.
TCA 7	<ul style="list-style-type: none"> Landcom have requested to TCA to provide surplus fill from the SWRL to Landcom for use in the town centre. This is proposed as an option in the SWRL EA (May 2010) subject to completion of a Phase 2 Contamination Assessment. This needs to be identified in the Submissions Report. 	This is not relevant to the current application. The current application does not seek approval to store or use surplus fill from the SWRL for use in the town centre.
TCA 8	<ul style="list-style-type: none"> The section on development contributions (SIC and Section 94) does not address the proposed costings for the two bridge crossings at Edmondson Park Station which form part of the project approval for the SWRL. These are currently unfunded projects. 	The two proposed bridge crossings will form part of the works Landcom proposes to carry out in lieu of the payment of monetary contributions. The scope of work and associated costings for each crossing will be fully documented in the voluntary planning agreement currently being negotiated with Liverpool Council.
TCA 9	<p><u>Page 13, TCA Comment</u> The proposed pedestrian link over the SWRL is not proposed in the SWRL concept design. TCA would be willing to integrate this subject to funding being secured and approval being obtained</p> <p><u>Recommendation</u> Provide a Statement of Commitment to ensure that Landcom consults with TCA on the proposed pedestrian crossing west of Edmondson Park Station.</p>	Noted. Landcom will consult with TCA on the proposed pedestrian crossing west of Edmondson Park Station. Refer to Statement of Commitment No. 88.
TCA 10	<p><u>Page 39, TCA Comment</u> TCA is proposing a "noise sharing" approach to the SWRL project meaning that detailed site planning should be used as a method for future residential adjacent to the proposed rail line to minimise noise.</p> <p>Noise attenuation at the subject properties should not be assumed and will only occur if compliance monitoring, to occur following operation of the SWRL, deems this option as the most appropriate solution. Noise minimisation strategies for new residential development is also a requirement in the State Environmental Planning Policy (infrastructure) 2007 (refer to 'Development near Rail Corridors and Busy Road - Interim Guideline', DoP December, 2008).</p> <p><u>Recommendation</u> Provide a Statement of Commitment to ensure compliance with State Environmental Planning Policy (Infrastructure) 2007 and interim Guideline</p>	Future applications, as relevant, will be accompanied by an noise assessment report demonstrating compliance with the noise criteria set out in the 'Development near Rail Corridors and Busy Road - Interim Guideline', DoP (December, 2008). Refer to Statement of Commitment No. 84.
TCA 11	<p><u>Page 50, Section 3.8, TCA Comment</u> Proposed hydrological measures must not impact on the South West Rail Link project and better integration is needed. The current proposed hydrological strategy for the SWRL and any attempt to modify the flow conditions through regrading is a concern which could impact on the viability and operational capacity rail line.</p> <p><u>Recommendation</u> Provide a Statement of Commitment to ensure that proposed regrading on land near the SWRL corridor does not undermine operational effectiveness of the proposed hydrological strategy for the SWRL.</p>	The concept plan does not seek approval for any physical work including regrading of land near the SWRL corridor. Future applications for physical works near the SWRL corridor, as relevant, will provide an assessment of the impact of such work on the effectiveness of the proposed hydrological strategy for the SWRL.

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
TCA 12	<p><u>Figure 20, TCA Comment</u> The lots on the northern side of the rail corridor near the proposed station are designated as heritage precincts. This would appear to be incorrect as there is no mention on the rest of the report or justification for the zoning. It is recommended that these properties be zoned more appropriately.</p>	The lots on the northern side of the rail corridor near the proposed station fall outside the land to which the Concept Plan / State Significant Site Study relates. It is expected that these lots will be rezoned B4 Mixed Use consistent the current proposal.
TCA 13	<p><u>Page 89, TCA Comment</u> Note that the bridge crossing at the Ingleburn Conservation Area has not been approved and search of these crossings does not have funding under the SWRL project <u>Recommendation</u> This needs to be clarified in the Submissions Report</p>	Noted.
TCA 14	<p><u>Page 90, TCA Comment</u> Planned public transport must integrate with the Edmondson Park Transport interchange <u>Recommendation</u> Recognise Statement of Commitment No.31 proposed by TCA and provide a similar Statement of Commitment that matches the TCA requirement.</p>	Noted and agreed.
TCA 15	<p><u>Page 91, TCA Comment</u> Consider showing approved commuter car park sites at station <u>Recommendation</u> This needs to be clarified in the Submissions Report</p>	Noted. To be shown as part of single application for Edmondson Park Town Centre.
TCA 16	<p><u>Page 93, TCA Comment</u> Clarify the location for electricity lines that are proposed to cross the SWRL corridor? There may be other potential locations along the SWRL corridor to achieve a joint utility crossing with the sewer line etc. <u>Recommendation</u> This needs to be clarified in the Submissions Report</p>	Noted. Landcom will work with TCA to resolve.
TCA 17	<p><u>Figure 32, page 114, TCA Comment</u> The rail corridor shown as SP2 zone is not an accurate reflection of the actual rail corridor. This should be updated to include all the land as agreed in the HOA to be used by the SWRL. <u>Recommendation</u> This needs to be clarified in the Submissions Report</p>	The Heads of Agreement is a commercial agreement between Landcom and TCA and is not a matter for consideration under the EP&A Act.
TCA 18	<p><u>Statement of Commitments 22, TCA Comment</u> Landcom need to consult with TCA with regard to commuter car parking <u>Recommendation</u> This needs to be clarified in the Submissions Report</p>	Noted. Should commuter car parking be proposed by TCA, Landcom will consult with TCA.
Submissions from the Public		
Brett Moseley (North Ingleburn Public School)	<ul style="list-style-type: none"> ▪ <u>Bambi Pre School annihilation</u> 	There will be a need for a range of childcare options in the Edmondson Park release area. Landcom is working with both Liverpool and Campbelltown Council's and is currently investigating all possible opportunities to retain Bambi Preschool within Edmondson Park South.
Robert Bushby (Ingleburn Chamber of Commerce)	<ul style="list-style-type: none"> ▪ <u>Bambi Preschool in its current location</u> 	Noted. Refer to above comment.

KEY ISSUE / SUBMITTOR	COMMENTS MADE	PROPONENT RESPONSE
Robert Campbell (6 Blomfield Road)	<ul style="list-style-type: none"> Extend sewer to service their property 	Landcom has no objection to the extension of the sewer to service the immediately adjoining area. This is a matter for the submitter to take up with Sydney Water
Troy Platten (60 Cassidy Street, Denham Court)	<ul style="list-style-type: none"> SWRL sub station Construction of underground power lines 	The SWRL substation referred to in this submission is not the subject of this application. Any disturbance to the road reservation including gardens and driveways would be made good. Construction of this driveway is to be reviewed with access to come from the south.
Jenny Nelson 6 Zouch Road, Denham Court 2565	<ul style="list-style-type: none"> Construction of any road in the unformed section of Zouch Road 	Construction of this driveway is to be reviewed with access to come from the south.
Therese Inzitari	<ul style="list-style-type: none"> SWRL sub station Construction of underground power lines 	The SWRL substation referred to in this submission is not the subject of this application. Any disturbance to the road reservation including gardens and driveways would be made good. Construction of this driveway is to be reviewed with access to come from the south.
John and Joanne Read (85 Cassidy Street)	<ul style="list-style-type: none"> SWRL sub station 	The SWRL substation referred to in this submission is not the subject of this application.
Ivana Papandrea (15 Cassidy Street, Denham Court)	<ul style="list-style-type: none"> Construction of underground power lines 	Any disturbance to the road reservation including gardens and driveways would be made good.
Milan Rezo 85 Cassidy Street	<ul style="list-style-type: none"> Extend sewer to service their property 	Landcom has no objection to the extension of the sewer to service the immediately adjoining area. This is a matter for the submitter to take up with Sydney Water
Joe Zarb 11 Blomfield Road	<ul style="list-style-type: none"> Extend sewer to service their property 	Noted. Refer to above comment.
Bambi Kindergarten	<ul style="list-style-type: none"> Bambi to remain its current location 	There will be a need for a range of childcare options in the Edmondson Park release area. Landcom is working with both Liverpool and Campbelltown Council's and is currently investigating all possible opportunities to retain Bambi Preschool within Edmondson Park South.
David Heckenberg (Zouch Road)	<ul style="list-style-type: none"> Not being included in the Release Area 	This property is unaffected by the proposal, being outside of the Edmondson Park Precinct. This property is not required for any drainage function.
B Painter (2 Blomfield Road, Denham Court)	<ul style="list-style-type: none"> Extend sewer to service their property 	Landcom has no objection to the extension of the sewer to service the immediately adjoining area. This is a matter for the submitter to take up with Sydney Water
Colin Harrington (5 Cubitt Drive, Denham Court 2565)	<ul style="list-style-type: none"> Support for the zone substation at corner of Campbelltown Road and Zouch Road SWRL sub station Construction of underground power lines 	<p>The SWRL substation referred to in this submission is not the subject of this application.</p> <p>Any disturbance to the road reservation including gardens and driveways would be made good.</p>