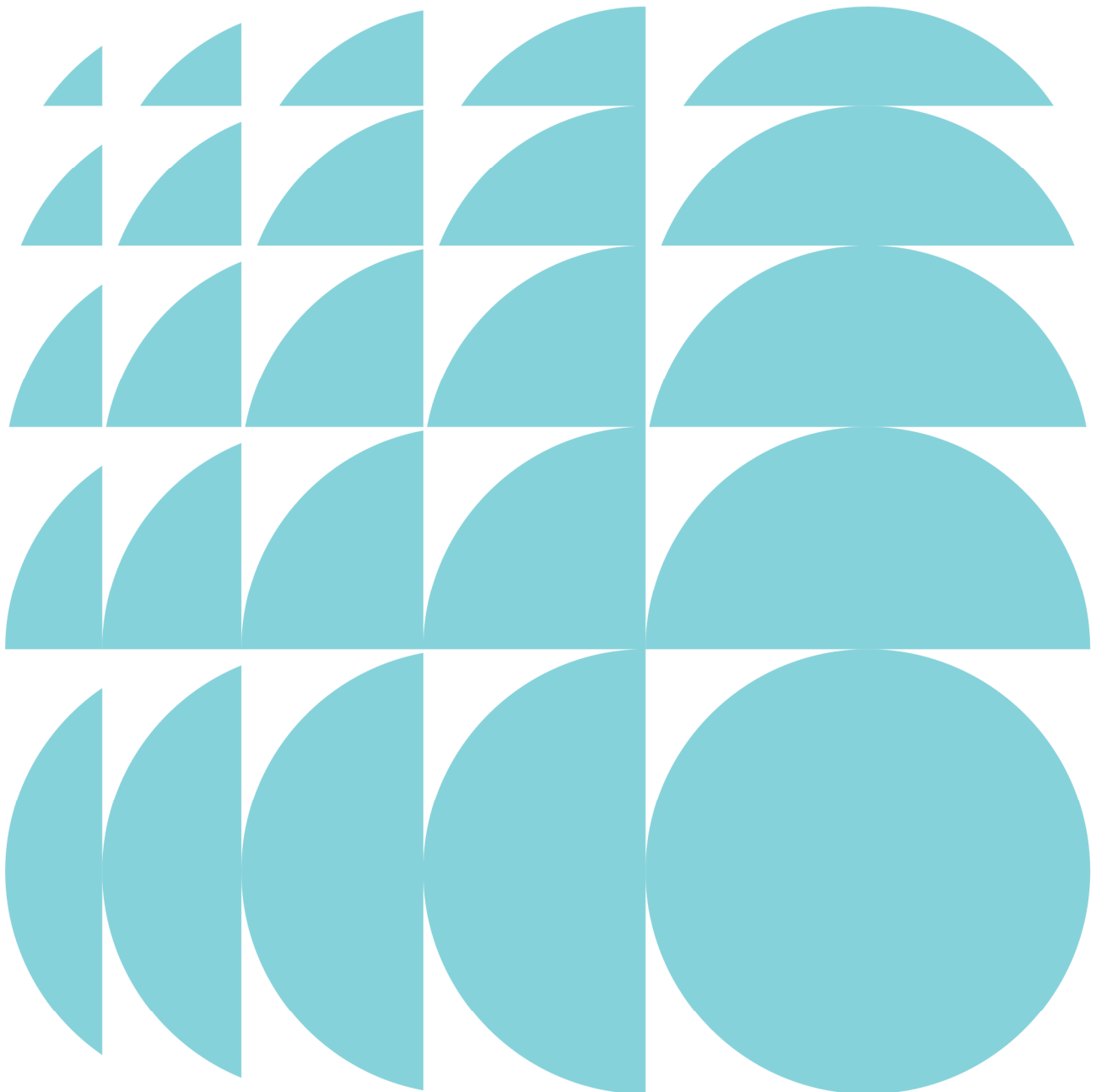


Request for Additional Information

Edmondson Park Frasers Town Centre
Town Centre East

Submitted to Liverpool City Council
On behalf of Frasers Property Australia

01 February 2018 | 15895



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Fiona Robbe

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Hassell

1.0 Introduction

This response has been prepared regarding DA-767/2017 for the first stage of the development of the town centre core of Edmondson Park to provide mixed use development with ground floor commercial spaces and construction of a residential and commercial podium with commercial and residential space including six residential flat buildings, all above two levels of basement car parking, civil engineering works to provide temporary site access, public domain works, landscape works and strata subdivision at Edmondson Park Frasers Town Centre (the site).

Council has provided three separate pieces of correspondence:

- Letter dated 21 November 2017 outlining matters raised by the Sydney Western City Planning Panel (SWCPP) at the initial Council briefing.
- Letter dated 30 November which outlines a range of issues raised by Council's Design Excellence Panel.
- Letter dated 22 December 2017 which identifies additional information required to be provided to enable further assessment of the DA.

This response has been structured to specifically respond to Council's issues and the SWCPP preliminary issues letter. A separate response and process will be undertaken for the issues that have separately been raised by the DEP.

Frasers would like to express its serious concern that some of the comments that have been provided as part of the assessment process to date do not show appropriate consideration of the approved Concept Plan and supporting assessment framework applicable to the Development Application (DA), including the terms of the Concept Plan approval (and Statement of Commitments), the Design Guidelines and Public Domain Plan.

As outlined at Section 2.1 of the SEE the Concept Plan has been modified to incorporate the winning concepts of the bid process and bid requirements of the NSW Government (Urban Growth). This has been a three-year process involving a range of stakeholders including the Department of Planning and Environment (the Department) and Liverpool City Council (Council) during which detailed assessment of the indicative scheme was undertaken.

The Concept Plan specifically establishes the layout, structure, built form principles and public domain principles for the eastern portion of the Town Centre Core, proposed by this DA, in order to agree the planning framework and outcomes for future DA's upfront.

After a lengthy and extensive period of consultation the Concept Plan modification was approved by the Planning Assessment Commission (PAC) with the support of Council and the Department. It establishes key planning framework for the Town Centre and approved the Design Guidelines and Public Domain Plan.

The Design Guidelines is the principle guiding document for the structure and built form of the Town Centre. The Public Domain Plan is the key guiding document for the layout and structure of the public domain, including the streets, mews, pocket parks and public open space. Condition 1.3 (c) and 1.3 (d) of the Concept Plan approval require each DA to demonstrate consistency with the Design Guidelines and Public Domain Plan. Importantly, both documents were discussed, in some detail, with Council and the Department prior to being incorporated into the Concept Plan. The DA has been prepared on this basis and is generally consistent with the Design Guidelines and Public Domain Plan.

Council has also been involved with the various DA's to date that have prepared the site for delivery of the Town Centre, including DA621/2016 and DA925/2016 which approved bulk excavation of the site, including the basement volume for the car park, considering issues like deep soil.

In accordance with Schedule 6A, Clause 3B (Transitional arrangements—repeal of Part 3A) of the EP&A Act, the consent authority must not grant consent under Part 4 for the development unless it is satisfied that the development is generally consistent with the terms of the approval of the concept plan.

As Council is aware, its role is to undertake an assessment of the DA within the statutory framework that applies to the site. We are concerned that the comments raised by the SWCPP and DEP do not correspond to the statutory framework that applies to the site and is inconsistent with the findings of the Department and the PAC in approving

the Concept Plan. Therefore, whilst some of the views expressed in the correspondence may not be shared by Council, it is important that Council guide the SWCPP and DEP in relation to the history of the project and the statutory framework that applies to all future development.

As noted above, significant work has been undertaken by local and state authorities throughout the Concept Plan modification to establish principles of development and provide a clear planning assessment framework that applies to the site. This provides certainty to Frasers, Urban Growth, local and state authorities and the community to the form and function of development will take at Frasers Edmondson Park Frasers Town Centre.

As the owners and long term operators of the Town Centre, Frasers have a vested interest in ensuring the Town Centre achieves a high quality design outcome. This is reflected in the thoughtful, interesting and co-ordinated outcome delivered by the Concept Plan and detailed DA. The Town Centre will deliver the residents of Edmondson Park a true Town Centre with a thriving high street, high quality buildings, parks, open space, streets and an abundance of convenient services and retail that are needed in this area. The high quality outcome is reflected in the Artist impressions that allow a sense of the unique Town Centre that will be delivered.



Town Square



Eat Street



Eat Street



NE Quadrant podium pool deck



Henderson Road



Corner of Henderson Road and Main Street



Main Street

2.0 Response to Council Comments

2.1 Masterplan

1. The eastern portion of the town centre core, at the town square, is to include community uses

Frasers agrees with Council that community uses will strengthen the Town Centre Core. However, it is important to understand that the subject DA is only part of the Town Centre Core. Frasers is working with Council on the VPA concurrently to determine what community uses Council want in the Town Centre as part of the future stages, in particular Town Centre West so that the right community uses are provided to support the future community in the completed Town Centre. As the scope and quantum of community uses is still being developed it is not possible to include them in this DA, however their presence on the west side of Main Street as part of the next (and larger) stage will by no means diminish their contribution to the Town Centre

Community uses also take different forms, and are not limited to internal spaces specifically nominated to be 'community uses'. Within the Town Centre East DA, the Community uses include the provision of the Town Square and Eat Street in the Town Centre East DA, which are consistent with the Public Domain Structure Plan (Refer to **Figure 1**). Town Square and Eat Street are designed as places for people to dwell, spend time and ensure social interaction. Eat Street features play equipment and landscape elements for public use whilst Town Square features water play and significant quantum of outdoor seating and planting creating a thriving community focused heart. Any member of the public will be able to use and enjoy the Town Square and Eat Street without having to spend money or visit any of the other commercial elements of the Town Centre. Refer to Section 2.5 (1) for further discussion of community uses provided as part of this DA.



Figure 1 Structure Plan

Source: Public Domain Plan

A diagram showing the extent and variety of community uses proposed across the Town Centre is shown at **Figure 2**. Further description of community uses in the public domain is provided by Hassell at **Appendix C**.

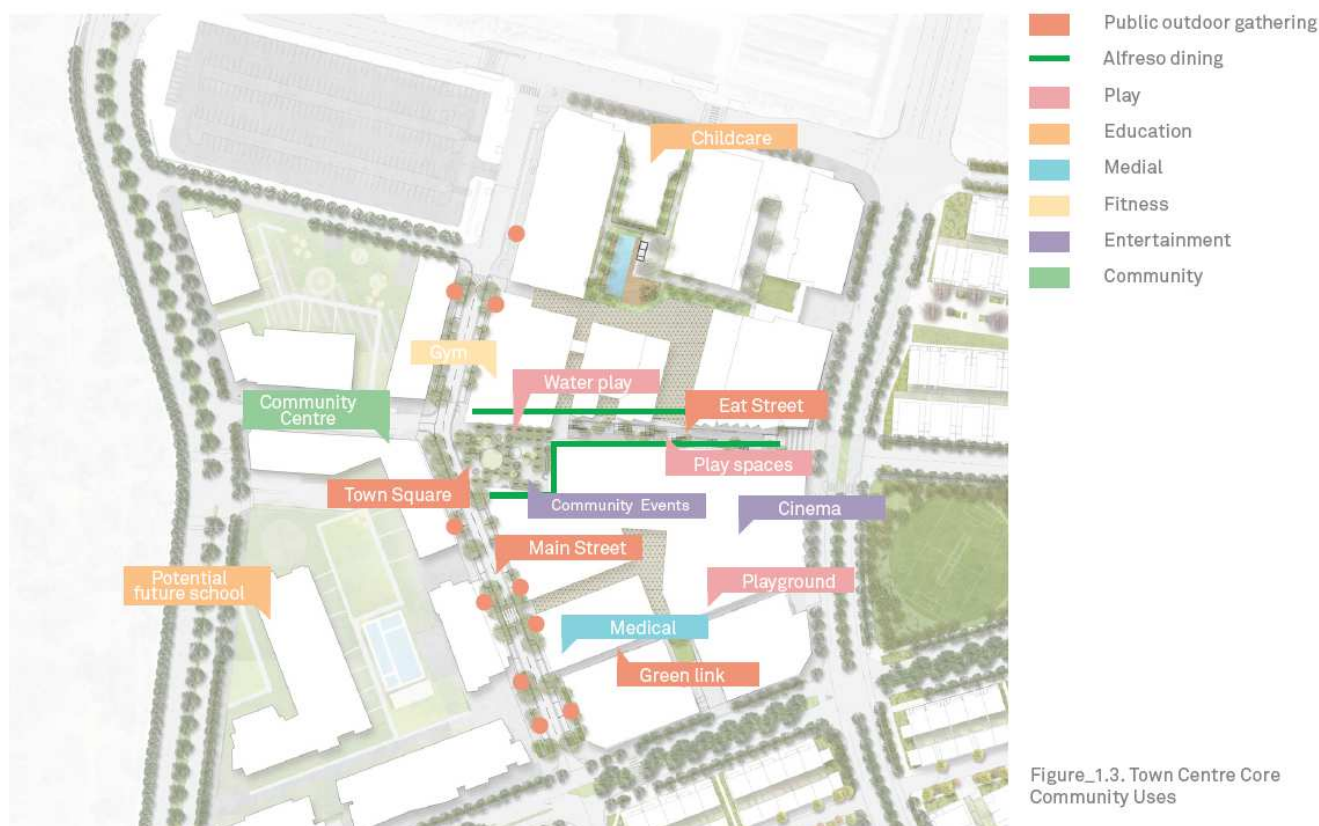


Figure 2 Community Uses across the Town Centre

Source: Hassell

2. A pedestrian linkage from Edmondson Park Train Station, running north-south through to Eat Street (is omitted)

The illustrative design scheme (**Figure 3**) incorporated a north-south pedestrian link between Henderson Road and Eat Street that crossed the NE Level 1 podium with substantial stairs at each end. This is reflected in the structure plan. This link was never considered to be located at Ground Level and would have provided a link to the Cinema entry on the podium of the NE Quadrant..

Following design development of Town Centre East, a number of design changes were necessary which required the relocation of the cinema from the NE quadrant to the SE quadrant and the fresh food concessions from the SE quadrant to the NE quadrant.

Under the illustrative design submitted with MOD 4 the cinema would have crossed the entire NE quadrant and separate the residential buildings on Soldiers Parade from the rest of the quadrant (refer to **Figure 3**). This enabled the inclusion and co-location of the pedestrian link over Level 1 between Henderson Road and Eat Street.

Following design development, an enhanced design solution relocated the cinema allowing residential buildings 10 – 13 to be located close to the train station at the north of the site. In turn, a consolidated common area was made possible across the NE quadrant uniting all the residential buildings and making the NE podium a united and larger space, providing greater amenity for residents (**Figure 4**).

These changes have prevented the inclusion of the podium level north-south pedestrian link which would sever the common area and introduce a publicly accessible walkway between private residential areas. Accordingly, the through site pedestrian link at Level 1 is not possible. An assessment of the alternative solution is provided at Section 2.5(2).

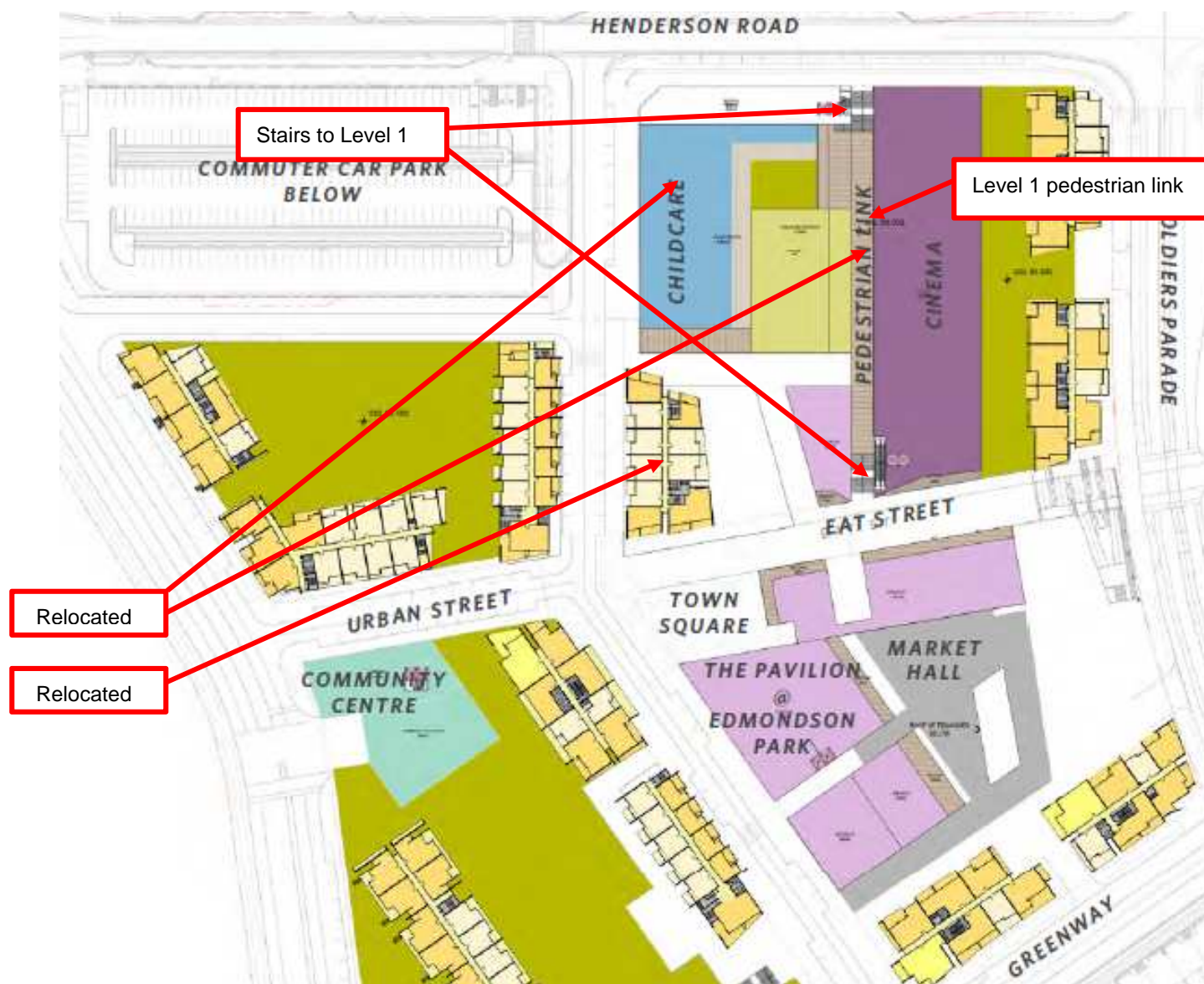


Figure 3 Illustrative Level 1 Plan

Source: Section 75W Illustrative Design Scheme

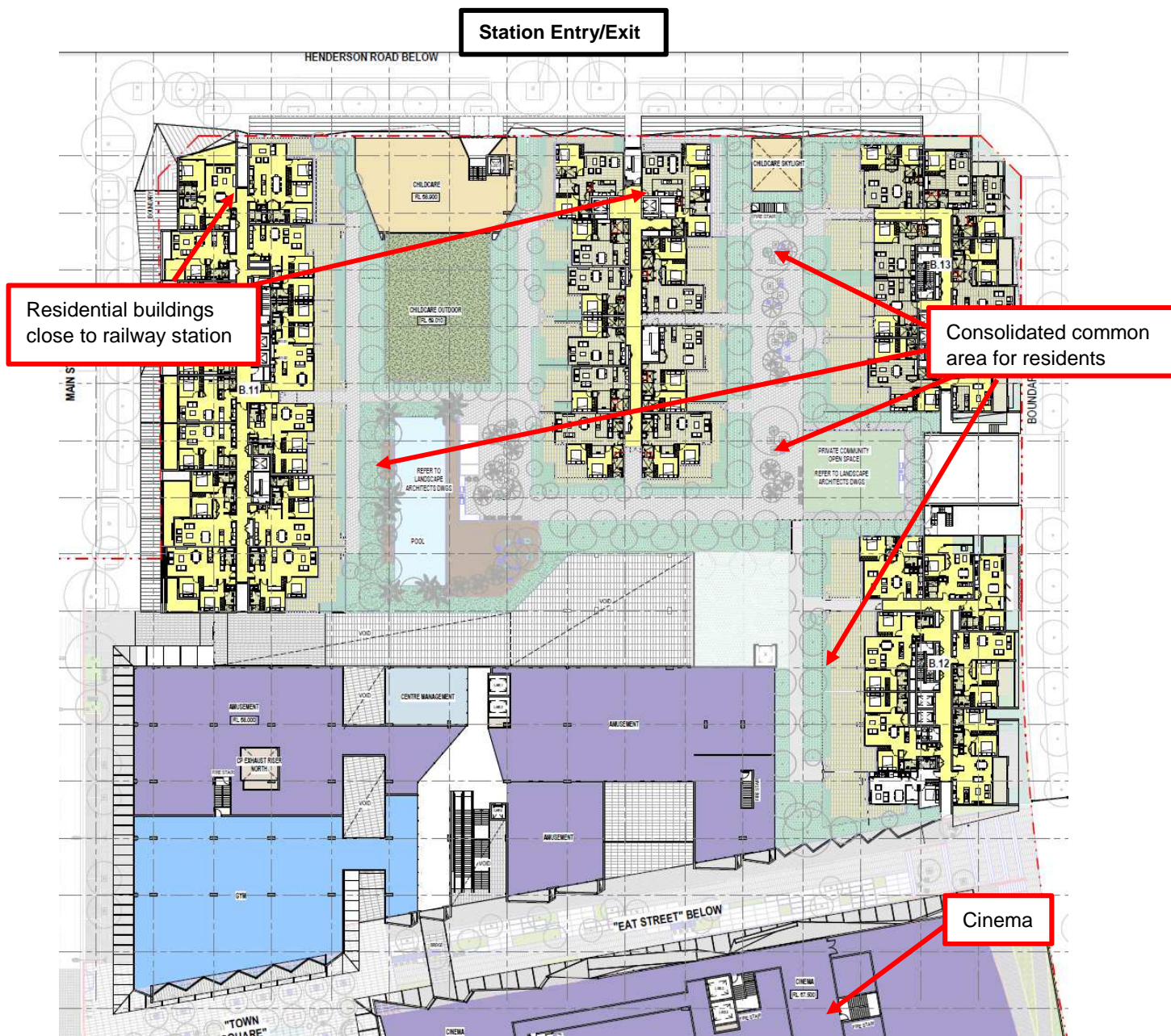


Figure 4 Design Solution proposed for NE Level 1 podium

Source: HDR

3. Active edges along the ground floor built form south of Eat Street and north of the Pedestrian Laneway fronting Soldiers Parade

The Soldiers Parade frontage has been designed to respond to the residential and parkland uses on the eastern side of Soldier's Parade. A diagram showing the Town Centre frontage strategy is shown at **Figure 5**. A commercial/retail frontage would have diluted the transition from pure residential in the east to mix use in the west. The ramp and grand steps with the dramatic Cinema form overhanging the ramps act as a signifier and gateway to Eat Street. The scale, mass and form sits appropriately between the residential towers (Buildings 7 and 12) giving visual activation, a preview, of the offer beyond.

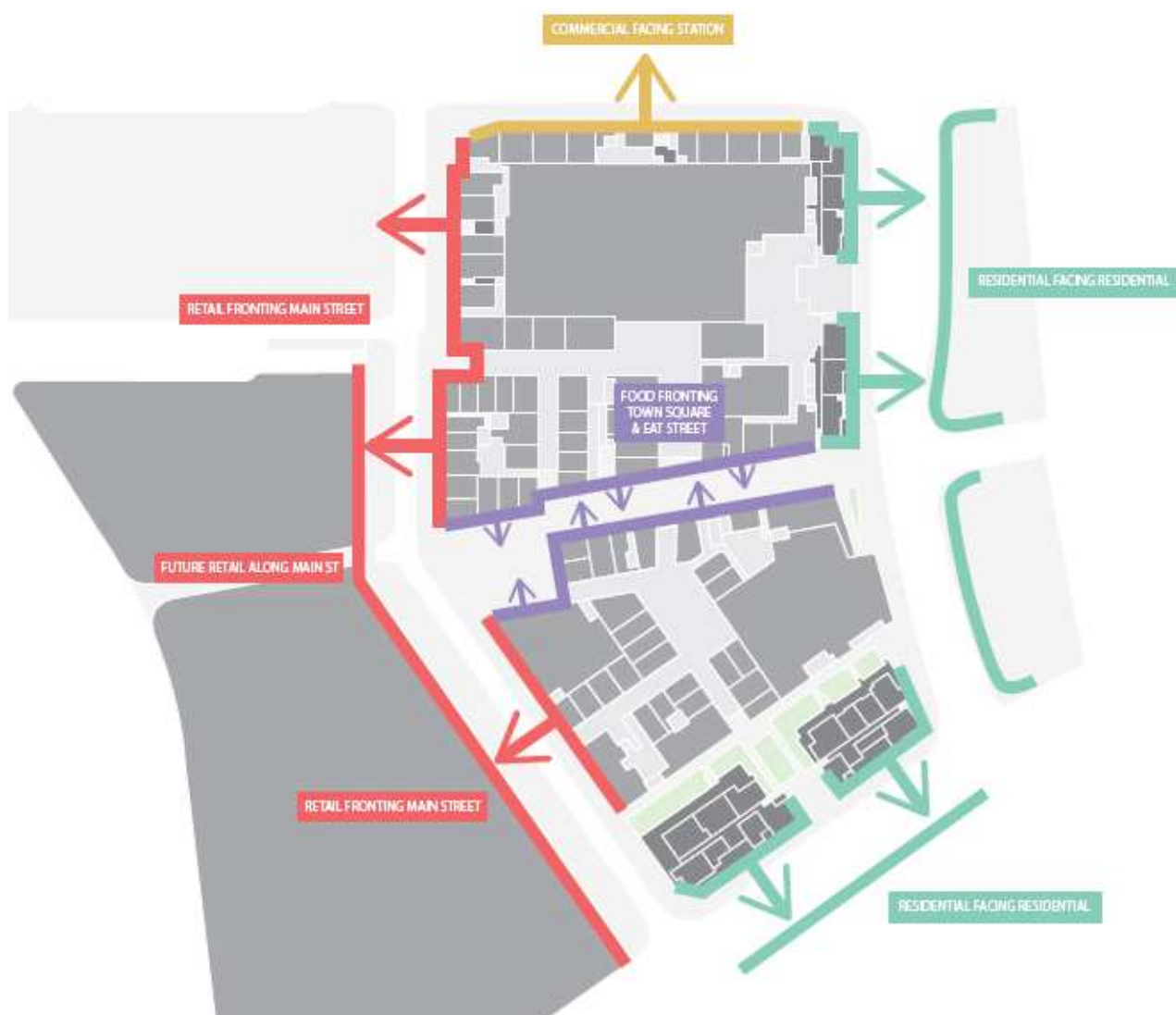


Figure 5 Rationale of frontages diagram

Source: HDR

At the corner of Eat Street and Soldiers Parade a food and drink premises is located above the Eat Street ramp that will permit a café or similar use that would have elevated views to the east. The large glazed façade allows people to look out to the public domain and for the activity to be read from the streetscape.

This interface also includes high quality treatments and unique architectural forms and materials to ensure the frontage is not read as a blank wall, further activating the façade. A large public art feature is proposed to the façade of the cinema above, providing visual interest to the streetscape and on balance will enliven this façade as a significant focal point for the Town Centre.

Between Eat Street and the 'green link' on Soldiers Parade the topography has not allowed for active uses to be level with the street. Along this section of Soldiers Parade part of Basement Level 1 protrudes above the Soldiers Parade street level, however this space has integrated many features to ensure the space is activated and provides the optimum design solution in the context of the site constraints.

Whilst every effort has been made to ensure plant and services are located away from public view statutory authorities require services that provide direct access from the street. The section of Soldiers Parade south of the Eat Street ramp and north of the Green Link provides important access to a number of co-located street accessible services (refer to Drawing DA 11) including:

- fire control room;
- fire hydrant and sprinkler booster assembly;
- sprinkler alarm valve enclosure;
- south-east quadrant main switch room;
- south-east quadrant substation.

Soldiers Parade is 376 metres long between Campbelltown Road and Henderson Road being predominantly activated by residential, retail and commercial land uses. Whilst the street accessible services are not an active land use, it accounts for approximately 25 metres in length or approximately 6 percent of Soldiers Parade. Soldiers Parade accordingly remains a highly activated street (**Figure 6**).



DIAGRAM I
ACTIVE EXTERNAL FRONTAGE

Figure 6 Active frontage diagram

Source: HDR

Notwithstanding, **in response to Council’s comments the Architectural Plans have been updated (Appendix A) to incorporate additional public art to increase activation of the façade where the services are located. The art at this location will form part of public art proposed along the Green Link (discussed below) and will energise the frontage where required services are provided.**

The plans have been amended to accommodate commercial offices at the corner of Greenway and Soldiers Parade, further activating this part of Soldiers Parade, consistent with the Design Guidelines (Figure 8 and Figure 9 and Appendix A).

An elevational view of Soldiers Parade, (facing west) between Eat Street and the Greenway is shown at **Figure 7** below that highlights the functional and active components of this section of Soldiers Parade. In general, the elevation has been articulated to:

- respond to the topography of the site that prevents inclusion of street level retail/commercial or residential; and
- incorporates landscaping to the Eat Street ramp to soften and enhance the visual interface whilst providing equal access;
- accommodates necessary street accessible services.

In order to activate the streetscape, the design:

- allows for activity to be read within prominent retail at the corner of Eat Street and Soldiers Parade;
- has incorporated commercial tenancies at the corner of Greenway and Soldiers Parade as required by the Design Guidelines;
- provides visual interest through provision of significant public art on prominent facades; and
- provides unique architectural forms and a combination of varied, high quality materials to activate the streetscape.



Submitted DA



Amended DA

Figure 7 Soldiers Parade activation (Eat Street – Greenway elevation)

Source: HDR

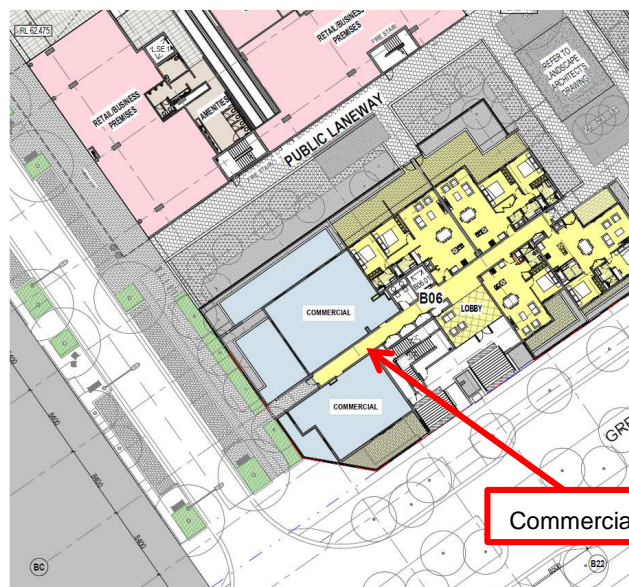


Figure 8 Corner of Greenway and Main Street
Source: HDR

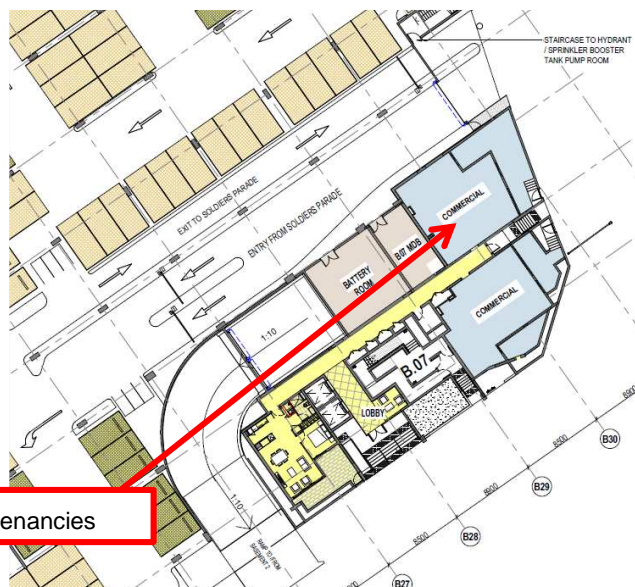


Figure 9 Corner of Greenway and Soldiers Parade
Source: HDR

4. **Main Street to be designed to provide “generous pockets of plantings”. Considering that no deep soil zones have been provided within the eastern portion of the town centre core there is not considered to be the ability to provided sufficient planting to suite the local climate and address the potential impacts associated with the urban heat island effect**

When considering the urban heat island effect and provision of deep soil, you cannot consider the Town Centre East DA in isolation. It is important to consider the masterplan for the entire Edmondson Park development when considering the inclusion of deep soil as the overall public domain strategy seeks to deliver the outcome desired by Council of a coordinated Town Centre that addresses the urban heat island effect with extensive planting that will suit the local climate.

To do this the Frasers Town Centre is connected to extensive natural bushland in the east and west of the Frasers Town Centre being surrounded by 48.5ha of Cumberland Plain Forest in the east and 1.9ha to the west. The design of the Town Centre will provide strong connections to this surrounding bushland particularly along a heavily landscaped Greenway that connects bushland east-west.

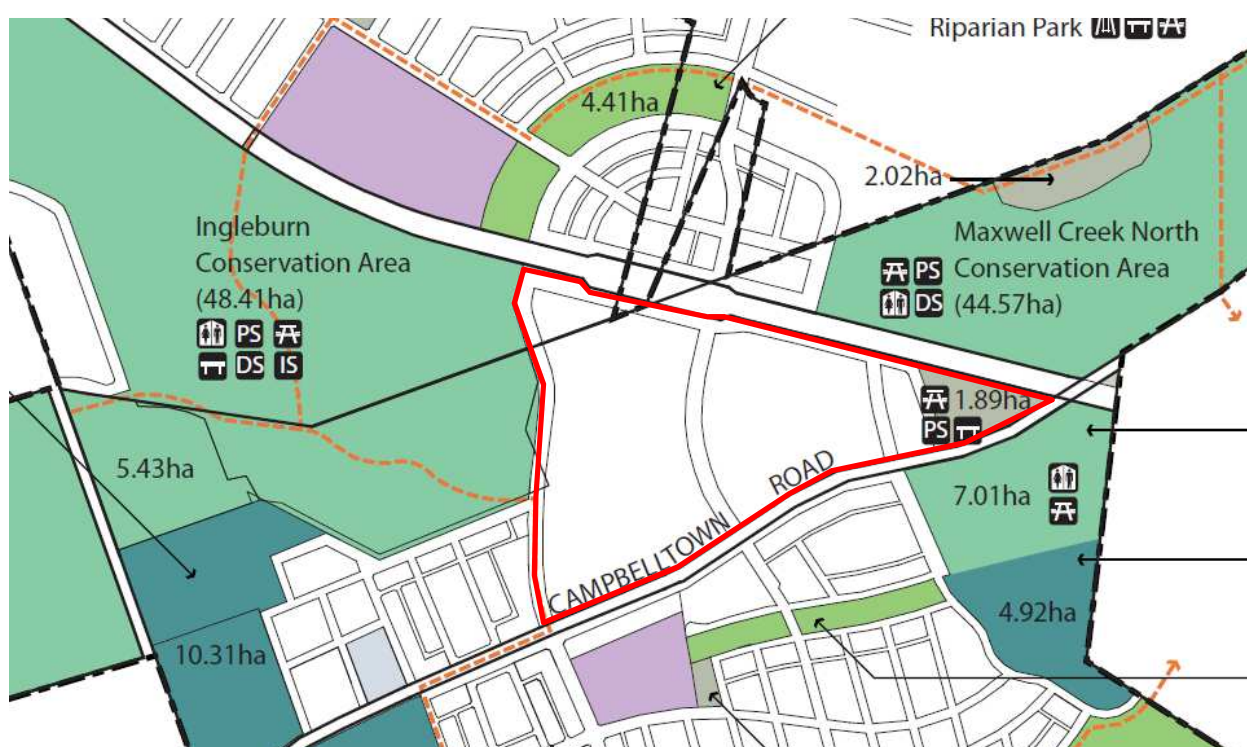


Figure 10 Edmondson Park South Concept Plan Landscape Strategy

Source: Hassell

Bookending the Town Centre core is the 48.5ha Edmondson Regional Park to the west and to the east the 7,900sqm Town Park (west) locating extensive deep soil and woodland adjacent to the Town Centre that will reduce the heat island effect on the macro scale. Town Square and Eat Street (1,400sqm and 1,350sqm respectively) and future Urban Street will connect these woodland spaces east-west by extensive planting within the Town Centre locating and spacing trees to provide a largely constant canopy in Town Square (refer to **Figure 20**) reducing the heat island effect at the micro scale. The detailed design of these spaces is further discussed at Section 2.5.

The east-west streets outside the Town Centre (particularly Greenway) will be heavily landscaped to extend the Cumberland Plain woodland into the precinct with streets north-south providing beautiful landscaped vegetation connecting to the green spine and extending nature throughout the Frasers Town Centre, further reducing the heat island effect. Whilst not within the site boundary of this DA, these spaces are directly relevant to the issues raised by Council.



Figure 11 Frasers Town Centre open space hierarchy

Source: Hassell

The Town Centre, as the urban centre has located densities close to the railway station and consolidates all parking below ground. The consolidated car park will enable the public with convenient access to the Town Centre whilst avoiding unsightly at-grade parking and provision of services typically located within a basement being located on the street. To maximise the basement for public use and to enable the streets to be heavily landscaped in line with the vision described above the Town Centre core does not include traditional deep soil but seeks to achieve the same outcome by provision of on structure landscape infrastructure.

As shown at **Figure 12** Main Street includes landscaping within pit infrastructure that has a minimum 1 metre depth in volumes provided regularly along the length of Main Street, above and below the pavement, acting in the role of deep soil. As shown at **Figure 12** a below ground car park has always been considered in the design of the Town Centre with landscaping provided on structure in suitably sized pits to support healthy tree growth.

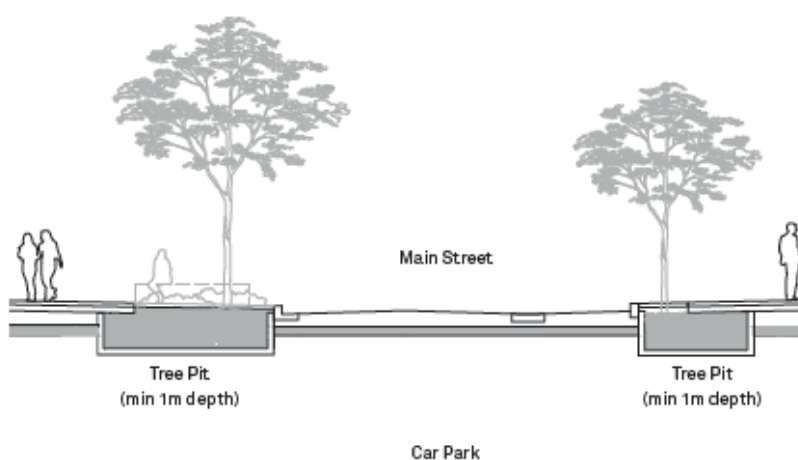


Figure 12 Main Street indicative Section details

Source: Public Domain Plan

Hassell has selected species appropriate for the local climate with suitable volumes of soil to facilitate the 'generous pockets of planting' as identified by the Concept Plan. These pockets in Main Street are shown at **Figure 14** which shows they are regular and generous in size, largely being 25m^3 and in some instances, greater. Hassell have prepared a separate response in support of the DA at **Appendix C** that confirms the volumes will enable healthy mature tree growth throughout the Town Centre.

Based on the tree pit size and selected species the trees are expected to reach a height of generally between 10 and 20 metres high with a canopy of between 5 and 10 metres. Shrubs and ground plane planting will also be accommodated throughout the Town Centre providing generous pockets of planting consistent with the requirements of the Concept Plan (Public Domain Plan).

Figure 13 demonstrates the outcome for Main Street as a well vegetated street featuring generous pockets of planting, street furniture and wide pedestrian footpaths ensuring Main Street will be a high quality, attractive and comfortable space for visitors.



Figure 13 Artist impression of Main Street

Source: HDR

Figure 14 shows the extent of below ground soil volumes that will be provided in support of the landscape strategy. Whilst not technically deep soil, the extent of soil is significant and achieves the objective of a well vegetated Main Street, Town Square and Eat Street that will address the potential impacts associated with the heat island effect. Town Square alone is a single 682m^3 volume extending beneath the entire square that acts as deep soil to allow 42 Honey Locust trees to grow. Similarly, Main Street includes 888m^3 of soil volumes that extend above and beneath the street allowing 42 Japanese Elm and Tulip Trees to grow. These volumes, whilst not traditional deep soil, act as deep soil within the urban centre and will contribute to reducing the impacts of the heat island effect.



Source: Hassell

The Town Centre seeks to balance the need to accommodate the extensive car parking and basement services necessary to support the Town Centre core with providing a high quality public domain at street level. The Town Centre is naturally a high density environment featuring extensive retail and services. It will need to accommodate large numbers of vehicles as western Sydney is reliant on vehicles for transport. The proposal balances this need with infrastructure that provides the soil volumes required to support an extensive canopy of trees that will address the impacts associated with the heat island effect. The volumes are significant and are appropriate for an urban centre like Edmondson Park. **Frasers are happy to provide a bond during the tree establishment period (2 years) to provide Council with confidence the trees will survive.**

Reducing the car park extent to increase deep soil would not have a significant impact on the impacts associated with the heat island effect that the current strategy doesn't address. The Town Centre is located adjacent 48.5ha and 7,900sqm of parkland reserve which on a macro scale will have a more significant impact on heat island than deeper tree pits within the Town Centre. The Town Centre core is surrounded by and transected with extensive vegetation and is provided with 1,752m³ of soil volumes in Main Street, Town Square and Eat Street. The objective sought by Council is appropriately addressed by the proposal.

Finally, it is noted that Frasers are the developer but also the long-term owner of the retail component and therefore have a strongly vested interest in the long-term success of the landscaping within the Town Centre.

Refer to 2.4(2) for planting details in the public domain. Refer to Section 2.4(2) for further discussion of deep soil.

2.2 Compliance with MP 10_0118 MOD 4 Conditions of Approval

1. ***Condition 1.3B requires that the market hall in the eastern portion town centre core must demonstrate design excellence through a design excellence strategy and this shall be undertaken before the lodgement of the first DA for that building. The applicant is required to satisfy this condition prior to the determination of the subject application.***

Frasers commenced a design excellence process and submitted the draft Design Excellence Strategy for the Market Hall to Council shortly after lodgement of the DA. Council has since provided comments which will require an alternative approach. Frasers is committed to work with Council on its preferred approach of establishing a separate panel to ensure design excellence is achieved and will be in touch with Council shortly about advancing this process.

2. ***Condition 1.14 requires the submission of a Heritage Interpretation Strategy with the subject DA. This shall be submitted for assessment by Council's Heritage Advisor.***

A Heritage Interpretation Strategy was prepared by TKD Architects in support of DA628/2016 (**Appendix I**). The strategy applies to the broader Edmondson Park Frasers Town Centre site and includes themes and a conceptual approach for the interpretation of the Town Centre site. Whilst the DA does not propose specific interpretation measures as part of the DA, approval for the detailed design of any interpretation elements will be undertaken at an appropriate time consistent with the Public Art Plan. It is expected that this will form part of a condition of consent.

2.3 Statement of Commitments

1. ***Commitment No.25 (embedded energy network) is not considered to have been appropriately addressed as part of the subject DA.***

Real Utilities has prepared a response outlining the proposed embedded energy network to satisfy this commitment (**Appendix M**).

2. ***Commitment No.34 (community garden) is not considered to have been appropriately address as part of the subject DA.***

This commitment relates to the broader Edmondson Park Concept Plan site and the community garden will be provided by Urban Growth in a location outside of the Frasers Town Centre. Commitment 34 was specifically amended as part of Concept Plan (Mod 4) in order to identify that Urban Growth is responsible for this commitment.

- 3. Commitment No. 71A (affordability) is not considered to have been appropriately addressed as part of the subject DA. The applicant is required to demonstrate how they will meet the target of dwellings within a range of price points and for moderate income housing. The applicant shall also confirm where within the FTC the affordable dwellings will be located (ie in the town centre core or the residential precincts);**

Affordable dwellings will be available in the Town Centre and Residential Precincts. Frasers has undertaken an analysis of the affordability benchmark for moderate income housing at Edmondson Park to inform this commitment (refer to **Appendix J**). This is a rolling target for Frasers across the entire Town Centre development, to be tracked by an annual audit. Frasers would be happy for this to form part of a condition of consent utilising the commitment wording, i.e. ***Prior to the issue of the relevant Occupation Certificate the proponent must provide Council with the annual audit demonstrating how it has performed against its commitment to provide dwellings within a range of price points within Edmondson Park Frasers Town Centre, including 15% of dwellings suitable for purchase as moderate-income housing (defined as 80% to 120% of the median gross household income in the Greater Sydney Region).***

- 4. Information with regards to Commitment No.20 (public art strategy) has been lodged by the applicant, however, at this stage the strategy is not considered to be sufficient. Council's Public Arts Officer has provided comments for the applicant to appropriately address**

The Public Art Strategy has been amended and is provided at **Appendix H**.

2.4 Apartment Design Guide

1. **3D – Communal and public open space:** *The RFB's in both quadrants do not comply with the Communal Open Space (COS) design criteria, of particular concern are the RFB's in the south-east quadrant. The proposal shall be amended to fully comply with the ADG and provide a minimum of 25% of COS for the RFB's.*

Further design development has enabled increased provision of common open space on Level 1 of the NE quadrant as shown on amended Architectural plans at Appendix A. This area is highlighted at Figure 15 below where the amusement tenancy has been replaced with landscaping. Amended Landscape Plans are provided at Appendix P.

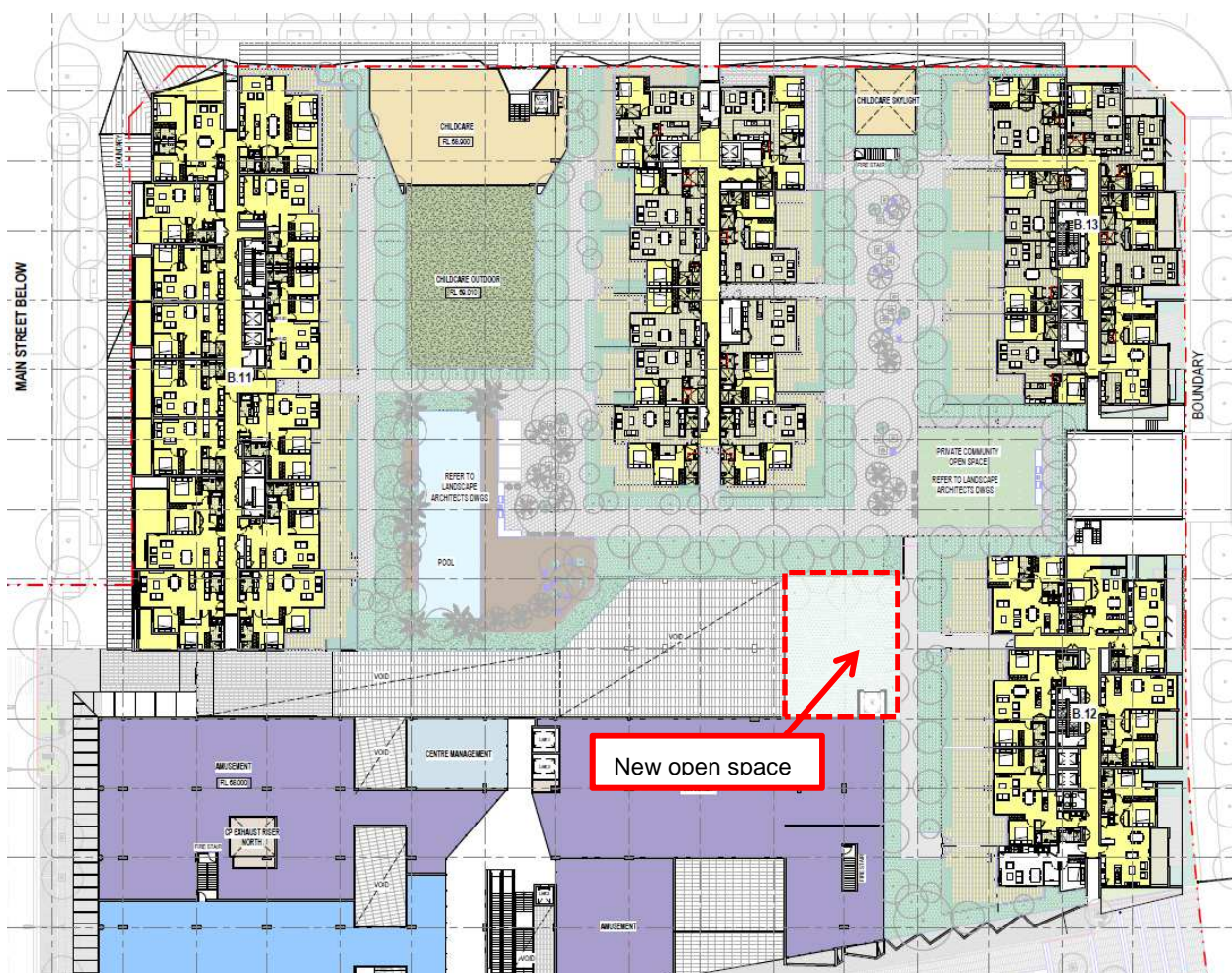


Figure 15 Level 1 Common Open Space

Incorrect calculations were provided with the SEE that is clarified by this response. Objective 3D-1 of the ADG requires an adequate area of communal open space be provided to enhance residential amenity and to provide opportunities for landscaping. Design criteria 1 sets the minimum provision of communal open space at 25 percent.

The proposal includes the provision of 3,038m² communal open space in the NE quadrant that is centrally located for the residents of Building 10, 11, 12 and 13. Communal open space for the residents of Building 6 and 7 is provided on the roof of Building 6 that equates to 530m². All residents have reciprocal access to all common areas across the Town Centre. A calculation of open space provision is provided at Table below that shows 44.8% common open space is provided for Residential Flat Buildings.

Table 1 Communal open space provision assessment

Building	Area	Common Open Space	Proportion
Building 6	1,157 m ²	530 m ²	44.3%%
Building 7	1,069 m ²		
Building 10	1,341 m ²	3,038 m ²	
Building 11	1,943 m ²		
Building 12	1,334 m ²		
Building 13	1,207m ²		
Total	8,051 m ²	3,568 m ²	

There is also concern that the RFB's in the north-east quadrant will unreasonably over shadow the COS areas and 50% direct sunlight to the principle usable part of the COS will not receive a minimum of 2 hours between 9am and 3pm during midwinter. The applicant shall adequately demonstrate how sufficient sunlight to the COS will be provided in accordance with the design criteria.

Objective 3D-1 of the ADG requires an adequate area of communal open space be provided to enhance residential amenity and to provide opportunities for landscaping. Design criteria 2 sets the minimum direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9 am and 3 pm on 21 June (mid-winter) is 50%. Council has requested evidence the common open space is not unreasonably overshadowed.

Shadow Diagrams provided by HDR at DA07 of the Architectural Plans (Appendix A of the SEE and reproduced at **Figure 16 – Figure 19**) show that during mid-winter the principal useable part of the common open space of the north-east quadrant between 9.00am and 12.00pm receives direct sunlight to the three primary useable parts of the common areas. The shadow diagrams show:

- Area A receives direct sunlight between 9.00am and 11.00am mid-winter to more than 50% of the space;
- Area B receives direct sunlight between 9.00am and 11.00am mid-winter to more than 50% of the space; and
- Area C receives direct sunlight between 10.00am and 12.00pm mid-winter to more than 50% of the space.

The common open space at the roof of Building 6 receives uninterrupted direct sunlight between 9.00am and 3.00pm mid-winter due to its elevated nature.



Figure 16 Mid-Winter 9.00am



Figure 17 Mid-Winter 10.00am



Figure 18 Mid-Winter 11.00am



Figure 19 Mid-Winter 12.00pm

- 2. 3E – Deep soil zones:** *The proposed development does not provide any deep soil zones within the development. The applicant is required to investigate options of deep soil zones at the site and demonstrate the adequacy of any deep soil zones that are added to the proposal.*

The proposal is consistent with the Concept Plan which always intended the Town Centre to have 100 percent site coverage as reflected by the illustrative design scheme which proposed two basement car parking levels below the entire Town Centre. Basement excavation of the entire volume of the Town Centre never included provision of deep soil. Council considered and approved excavation of the basement of the Town Centre under DA628/2016 and DA925/2016.

The ADG acknowledges that provision of deep soil within an urban environment such as a Town Centre can be difficult and is particularly difficult where below ground development can prevent inclusion of extensive deep soil stating:

Achieving the design criteria may not be possible on some sites including where:

- *the location and building typology have limited or no space for deep soil at ground level (e.g. central business district, constrained sites, high density areas, or in centres)*
- *there is 100% site coverage or non-residential uses at ground floor level*

The Town Centre is consistent with the above design guidance, performing the role of the CBD or centre of Edmondson Park with high density development. It has 100% site coverage and non-residential uses at the ground level.

The design guidance further states:

Where a proposal does not achieve deep soil requirements, acceptable stormwater management should be achieved and alternative forms of planting provided such as on structure

The Town Centre provides acceptable stormwater management which will be delivered as part of a coordinated Water Cycle Management Plan approved by the Concept Plan and reflected by Condition 1.21 which requires future development to be consistent with. This is addressed at Section 5.10 of the SEE submitted with the DA and is explored in more detail by the Interim Stormwater Management Strategy Report prepared by J. Wyndham Prince (Appendix H of the SEE). Stormwater infrastructure in the Town Centre connects with the stormwater infrastructure proposed by DA1260/2016 currently under assessment by Council.

The design guidance also states that alternative forms of planting, such as on structure should be provided. The Town Centre delivers this by providing extensive areas of planting that will provide lush vegetation across all streets and lanes in the Town Centre, meeting the objective for 3E-1 which states:

Deep soil zones provide areas on the site that allow for and support healthy plant and tree growth. They improve residential amenity and promote management of water and air quality

Volumes of soil are provided throughout the Town Centre that is consistent with the requirements of the Public Domain Plan and consistent with the ADG, will allow for and support healthy plant and tree growth. Hassell has provided advice to confirm the suitability of soil volumes and tree species for this DA (refer to **Appendix C**), particularly species that suit the Western Sydney climate. This will allow mature vegetation that will effectively provide a canopy of trees in public areas (along Main Street, Town Square, Eat Street) that is more generous than the provision of street trees in other town centres across Sydney.

A rendered plan view that shows the canopy provided at Ground Level of the Town Centre is shown at **Figure 20**. The rendered plan demonstrates that the provision of soil volumes over the basement car park allows for continuous mature vegetation and a tree canopy consistent with the surrounding streetscape.

The tree pit infrastructure is connected to the Town Centre drainage system to successfully manage the water cycle as discussed above.

The vegetation densities are no different to that achieved elsewhere where deep soil is provided, such as Henderson Road, Soldiers Parade and Greenway. Accordingly, the proposed trees will promote air quality to the same extent as vegetation housed in traditional deep soil.



Figure 20 Street level tree and podium canopy achieved in the Town Centre

Source: Hassell

Further vegetation will be provided within the common open areas of the NE podium that equates to 22 percent of the quadrant. This includes significant planting that has been specifically chosen to suit the local climate and required soil volumes to maximise mature tree growth (refer to **Appendix C**). These areas improve residential amenity and allow for and support healthy plant and tree growth as Objective 3E-1 states.

Notwithstanding the above, Main Street, Eat Street and Town Square will be well vegetated, featuring planting that is spaced to provide continuous canopy, as follows:

Main Street will feature:

- 19 x Japanese Elm trees (10m wide and 14m high); and
- 23 x Tulip Trees (8m wide and 20m high)

Town Square will feature:

- 42 x Honey Locust trees (7m wide and 15m high).

Eat Street will feature:

- 8 x Water Gum trees (5m x 7-12m); and

- In addition, the proposal includes provision of on structure tree pits and planters integrated into the design of the podium and rooftops that will improve residential amenity. The design has allowed suitable soil volume to enable a variety of planting that includes turf, shrubs and trees throughout the Town Centre. Advice has been prepared by Hassell (**Appendix C**) that demonstrates suitable planting can be achieved, including required soil volumes for each species.



Replacing existing areas of the Town Centre, such as Main Street or Town Square with deep soil would not act to provide additional vegetation than already delivered by the proposal, as tree densities cannot be increased beyond that already proposed.

The Town Centre does not suffer from any water management issues that would require deep soil to allow water filtration within the Town Centre Core. Water management across the whole Town Centre is addressed by an integrated site wide strategy as discussed previously and is a suitable approach.

Inclusion of a deep soil zone would also require deletion of basement areas which would result in reduced parking for visitors and residents. This would limit the convenience provided by the Town Centre and may result in increased demand for on-street parking. This is inconsistent with the Concept Plan which aims reduce parking demand on the local streets by provision of a consolidated car park that is shared between multiple land uses.

Frasers are confident that the design approach for the Town Centre will deliver lush green spaces with an abundance of vegetation, appropriate for a Town Centre and consistent with the vision of the Public Domain Plan.

To ensure this Frasers are happy to provide a bond during the tree establishment period (2 years) to provide Council with confidence the trees will survive and the tree infrastructure enable mature growth.

Further it is noted that Frasers are the developer but also the long-term owner of the retail component and therefore have a strongly vested interest in the long-term success of the landscaping within the Town Centre.

Deep soil is further discussed at Section 2.1(4).

- 3. 4A – Solar and daylight access: Building 6 does not comply with the design criteria that requires a minimum 70% of apartments receive adequate sunlight between 9am and 3pm during mid-winter. Accordingly, this RFB shall be amended to comply.**

Consistent with design solution DS2.3 the corner of Greenway and Main Street and Greenway and Soldiers Parade has been amended from residential to commercial floor space. Amended plans are provided at Appendix A.

By converting two units on the ground floor for commercial floor space Building 6 will achieve 70% solar access (30 out of 43 units being solar compliant).

By converting two units on the ground floor for commercial floor space Building 7 will achieve 73% solar access (52 out of 71 units being solar compliant).

- 4. 4F – Common circulation and spaces: Building 10 proposes 10 units of a single core, which is unacceptable and shall be amended to comply with the design criteria.**

The Design Guidance of Objective 4F-1 states that “where a design criterion 1 is not achieved, no more than 12 apartments should be provided off a circulation core on a single level”. Building 10 provides 10 units off the core on a single level, consistent with the Design Guidance for this objective.

The proposal is consistent with design guidance and achieves the objective of AF-1 as follows:

- the number of apartments on the floor does not exceed 12;
- the corridors will achieve a high level of amenity through the provision of access to daylight;

the apartments in the building achieve high levels of amenity, including compliance with the ADG solar access and cross ventilation requirements.

2.5 Edmondson Park Frasers Town Centre Guidelines

Design Excellence

A separate response to the comments received by the DEP will be addressed by Frasers.

Principles

1. Council Comment

- *The Town Centre has a distinct, attractive urban character and sense of place*
- *The public domain is well designed and finished to a high standard, and contributes to the creation of a distinct sense of place for the town centre*

At this stage, the proposed development is not considered to provide a ‘sense of place’ that would contribute to a town centre, but, instead would create a shopping centre with associated residential development. This is considered to be exacerbated by the limited inclusion of community uses within the eastern portion of the town centre core and departure from the PAC approved master plan, as discussed above in point No.1. The applicant is required to adequately demonstrate how the above principles of the TCG have been achieved by the proposal.

Sense of place and character is formed by the layering of the many different physical and ephemeral elements of the Town Centre including built form scheme, landscaping, material selection and public domain. Significant work has been undertaken by the project team as part of MOD 4 about a strategy to achieve the character of the public space. This is reflected in the Public Domain Plan and Design Guidelines, which the DA remains consistent with. As outlined at Section 2.1 (1) community uses are provided in Town Square and Eat Street as envisioned by the Concept Plan and Council will advise what community uses they want as part of the VPA process. A diagram showing the extent and variety of community uses proposed across the Town Centre is shown at **Figure 22**.

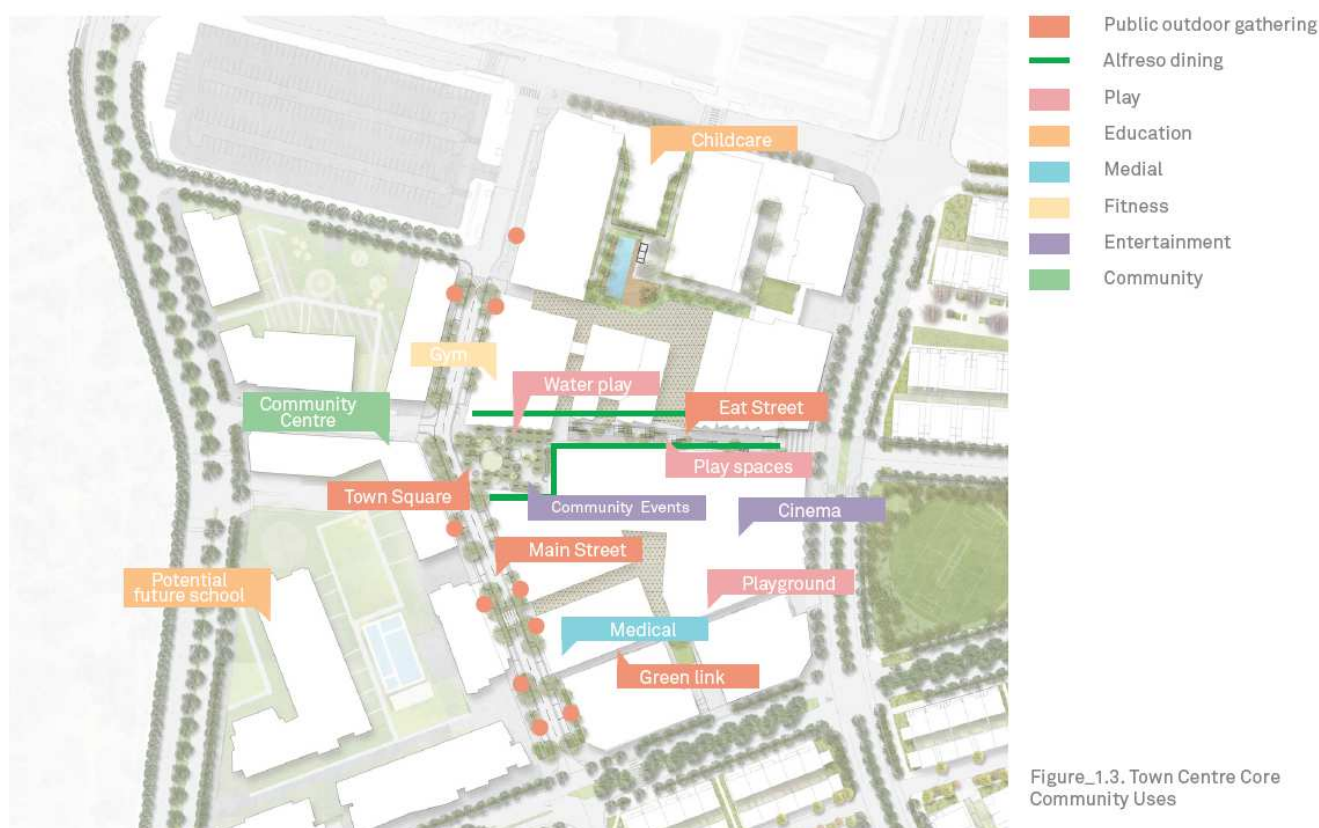


Figure 22 Town Centre Community Uses

Source: Hassell

The built form achieves high quality of design and expression which combined with the high quality of the public domain will present an attractive urban character by providing a collection of spaces and facilities that accommodate the varied needs of the richly diverse community. A variety of day-to-day uses, pedestrian friendly Main Street and multifunctional public spaces place a strong emphasis on the outdoors, recreation as well as encouraging social engagement with visitors and residents who are invited to stop, slow down and engage with the environment and each other.

Part of the sense of place of the Town Centre is achieved by the character of the streets through the selection of high quality paving, tree species and scale. These elements have been chosen by Hassell to tie in with the historical context and appropriateness to the local environment to deliver the character and feel of Main Street, Town Square and Eat Street, as outlined in the Public Domain Plan. Further commentary is provided by Hassell further at **Appendix C**.



Figure 23 Town Centre activation concepts

Source: Public Domain Plan

2.5.1 Town Square

Town Square is a place for people of all ages to come together, socialise, dine, recline, relax and play. It will have a family friendly environment with its own sense of place and character informed by the unique landscape design with raised lawn, multi-mode water feature, a copse of trees and extensive outdoor seating. Clearings have been designed into the copse to allow for temporary community events of various scales to occur. Events may include weekend bocce, giant chess, pop-up library or a flower market. Event zone sizes are as follows;

- Large 140sqm and 100sqm
- Medium 96sqm
- Small 24sqm

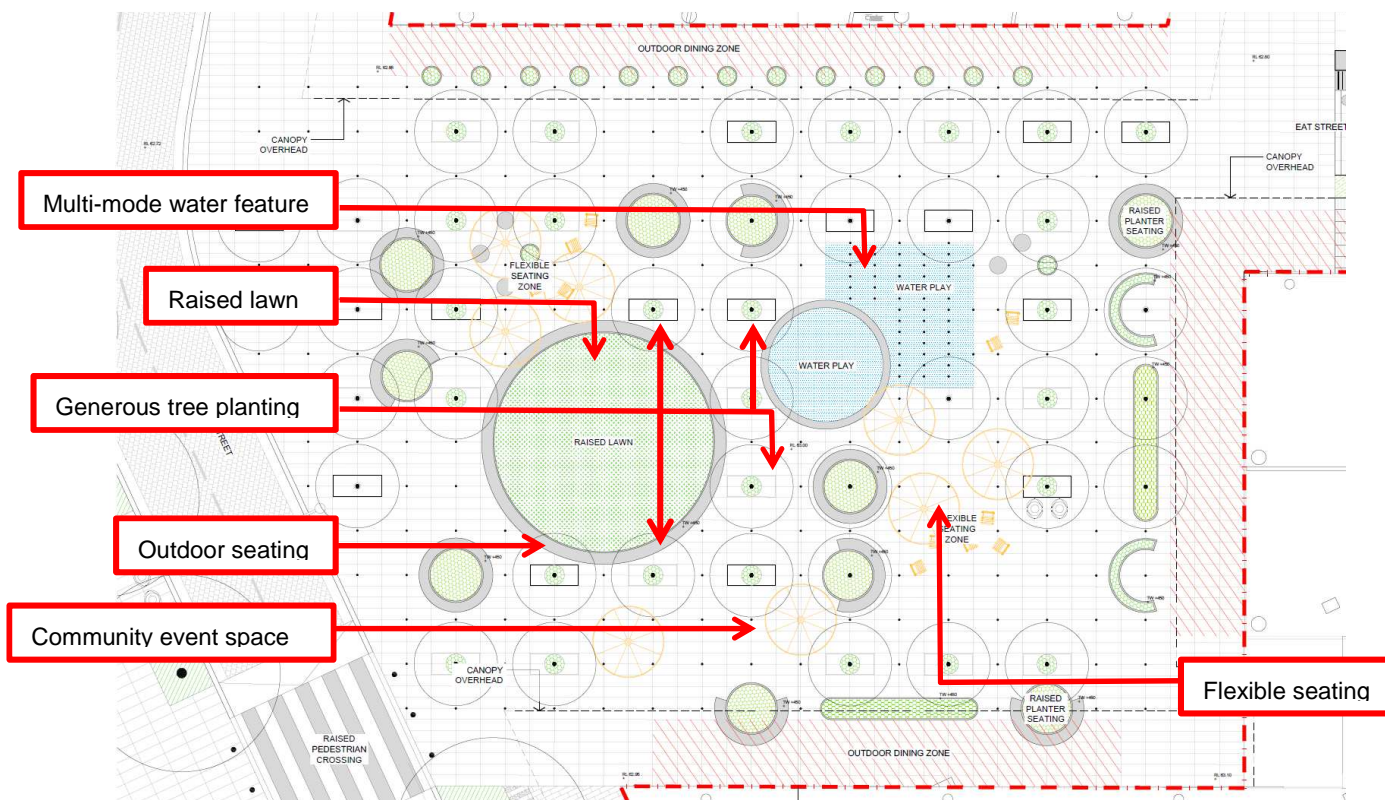


Figure 24 Proposed Town Square design scheme

Source: Hassell



Figure 25 Artists impression of Town Square

Source: HDR



Figure 26 Town Square and Eat Street illustrative concept

Source: Public Domain Plan

2.5.2 Eat Street

Eat Street is a place to meet, catch-up and dine with friends and family as well as a people watching promenade. It will have a distinctive feel provided by the pedestrian nature of the laneway lined with outdoor dining and featuring a central activation zone with integrated play and seating, as outlined in the Public Domain Plan.

PLAY AMENITY (INDICATIVE ONLY)



Figure 27 Indicative Eat Street play amenity

Source: Hassell

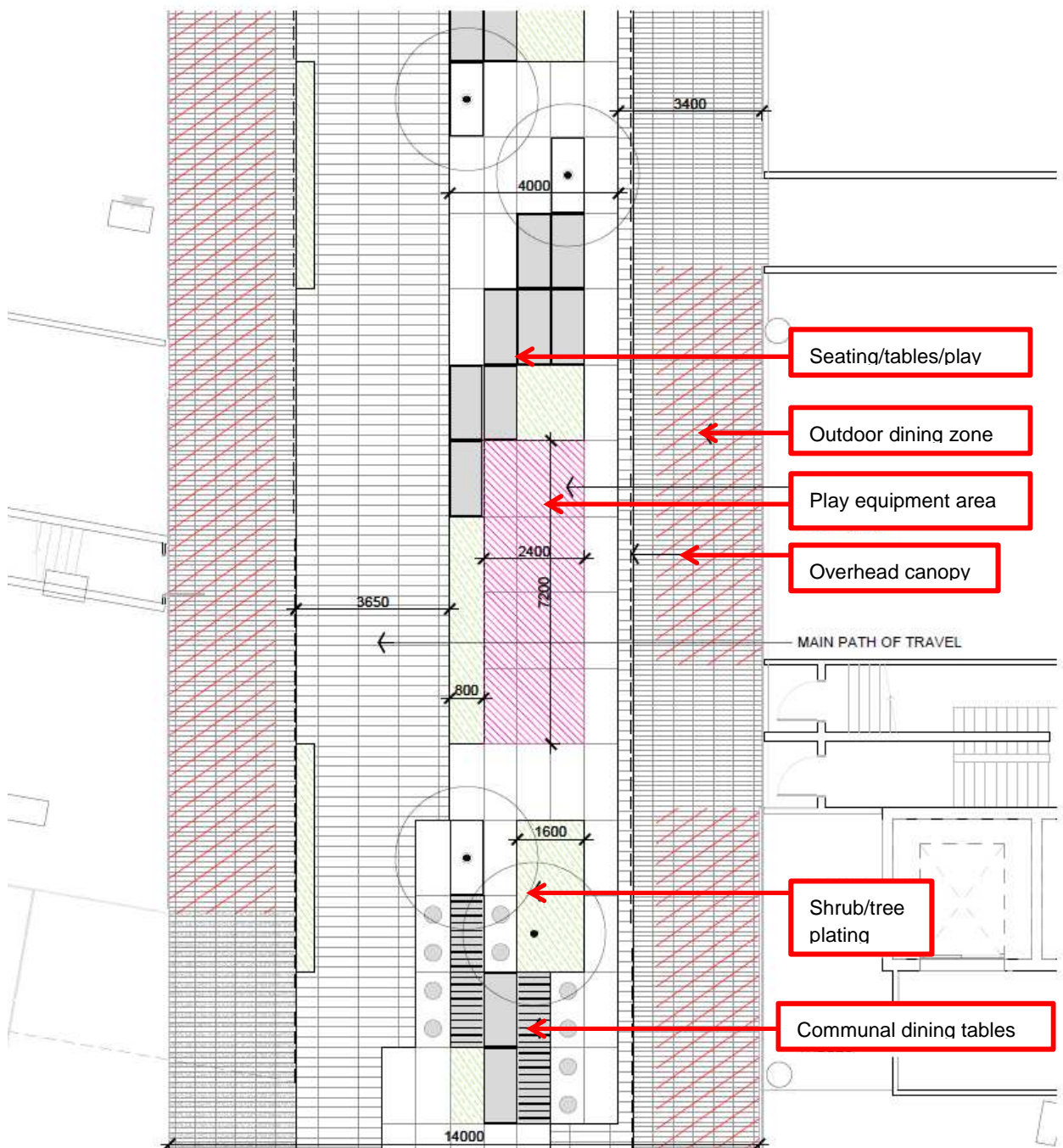


Figure 28 Proposed Eat Street detail plan

Source: Hassell



Figure 29 Artists Impression of Eat Street

Source: HDR



Figure 30 Artists Impression of Eat Street

Source: HDR

2.5.3 Main Street

Main Street provides a pedestrian friendly environment with wide footpaths for active uses including gathering nodes and incidental meeting points and generous pockets of planting. These are all documented in the DA, consistent with the Public Domain Plan.



Figure 31 Artists Impression of Main Street

As discussed in Section 2.1 above, Frasers intends to provide Council community spaces in the Town Centre West which will further contribute to the creation of the sense of place within the Town Centre.

Accordingly, the DA has achieved the above principles by delivering a Town Centre with an attractive urban character and diversity of places with a well-designed public domain that will be finished to a high level of quality.

It is also important to note that ultimately the creation of a successful Town Centre relies strongly on the quality and success of the retail offer complementing and supporting the community uses and spaces that are provided. As a result, Frasers' carefully considered approach to ensuring the retail is successful is a fundamental component in achieving a sense of place.

2. Council Comment

- ***The Town Centre has a compact, legible and walkable structure***
- ***Streets, pedestrian and cyclist paths create an interconnected, legible and permeable network of major, minor and fine grain connections that facilitates convenient, safe, and comfortable movement***

As discussed above the development does not provide optimal pedestrian legibility, walkability, permeability and comfortable movement due to the omission of a pedestrian link from the station to the east street as per the master plan. This is considered to reduce the hierarchy of pedestrian permeability and fine grain connections, which detracts from the creation of a town centre and a 'sense of place'. There is considered to be over emphasis on Main Street as the focus of pedestrian activity into the town centre from the train station. The applicant is required to adequately demonstrate how the above principles of the TCG have been achieved by the proposal in this context.

Masterplan principles are reflected in the Public Domain Plan including street layout, pedestrian, cycle and street networks. The DA is consistent with these principles providing a well-coordinated Town Centre that once completed will create a compact, mixed-use, safe, and well-connected walkable and cyclable Town Centre directly adjacent to the Edmondson Park rail/bus interchange. The proposal remains consistent with Frasers bid design and the indicative design at Ground Level providing the major, minor and fine grain links as envisioned by the Concept Plan (**Figure 32** and **Figure 34**). HDR has provided a comparison of the proposed design to the original bid design at **Appendix B**.



Figure 32 Indicative illustration scheme layout

Source: HDR

The pedestrian movement network (**Figure 33**) nominates pedestrian links through the Town Centre being Main Street (north-south) and Eat Street/Urban Street (east-west). These spaces are identified as the **main pedestrian links** constitute all pedestrian movements within, through and around the Town Centre connecting all residential

precincts to the Town Centre and allowing people to pass from the station to their homes either in the Town Centre or residential precincts.

Shared paths surround the Town Centre along all main roads providing both pedestrian and cycle infrastructure. The dimensional requirements for footpath, shared paths, roads and the like are approved by the Concept Plan and included in the Public Domain Plan, confirming the suitability of these spaces to perform their function as legible and walkable spaces.

Delivery of the street network achieves the principle for the Town Centre to provide streets, pedestrian and cyclist paths that are interconnected, legible and permeable and that facilitate convenient, safe, and comfortable movement. The minor and fine grain links are highlighted at **Figure 34** which is consistent with the Illustrative Design (**Figure 32**).



Figure 33 Pedestrian and Cycle Plan

Source: Public Domain Plan

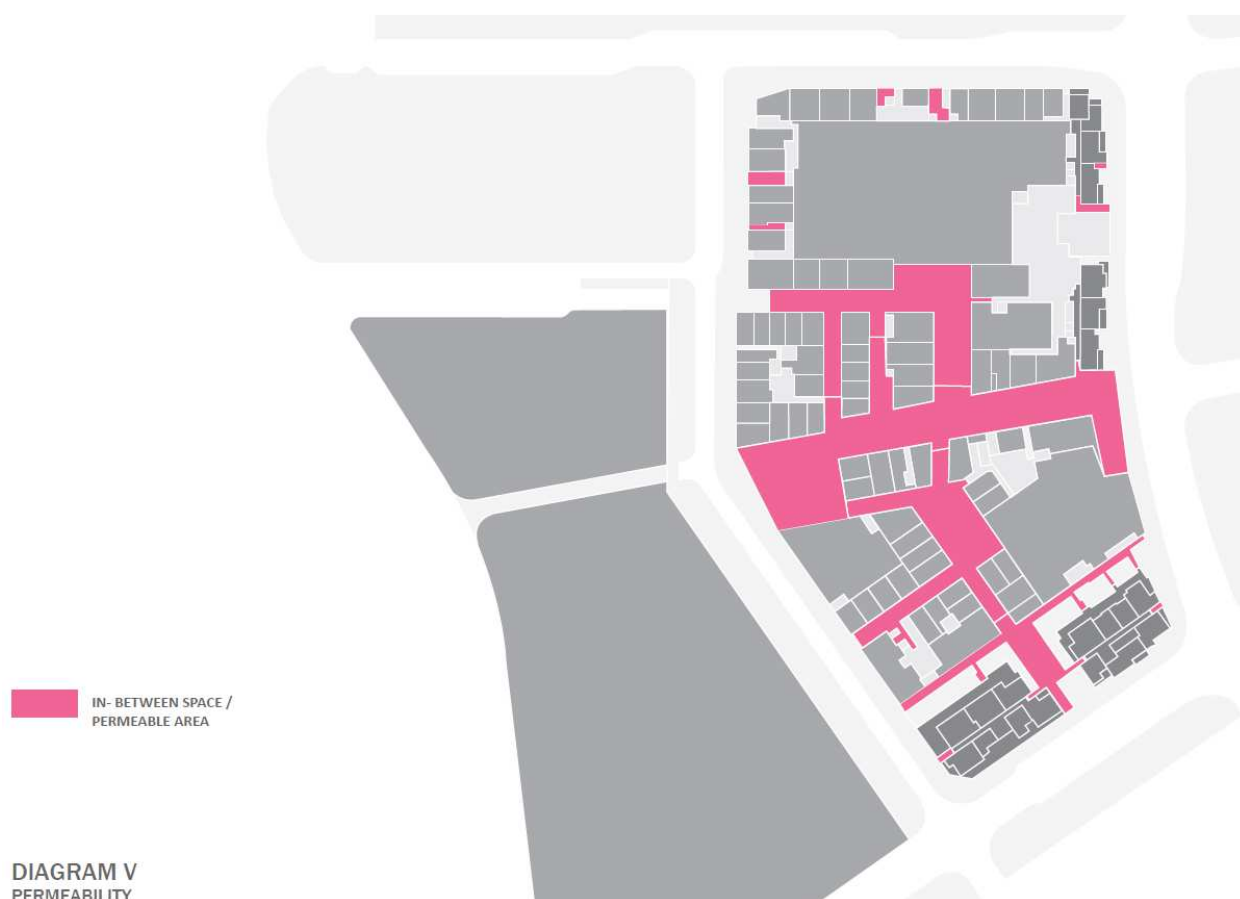


Figure 34 Town Centre East Minor and Fine Grain Links

Source: HDR

The pedestrian laneway between Henderson Road and Eat Street shown in the illustrative Master Plan (**Appendix G**) traverses the north-east podium at Level 1 with a bank of stairs at either end. As outlined at Section 2.1(2), design changes have prevented its inclusion. The alternative design solution for the NE quadrant has introduced Building 10 and increased the provision of common open space for residents in the location where the pedestrian link was previously. Despite not providing the pedestrian link, the proposal remains consistent with the relevant performance criteria.

Design Solution 4.3 Open Space, DS3.3 states:

Linear publicly accessible open space is provided on the retail podiums to provide additional connectivity and activation through the Town Centre Core

The proposal has not adopted this design solution for the NE quadrant which has provided open space on the podium for the use of the child care centre and for residential amenity.

Section 2.5 of the Design Guidelines states:

Should development not adopt a design solution, it may propose an alternative design solution. This alternative solution will be assessed against the relevant performance criteria.

An assessment of the relevant performance criteria is provided below.

Table 2 Performance Criteria PC3 Open Space

Open Space	Comment
complements public domain within the Town Centre Core	<p>The NE quadrant common open area has increased in size with larger spaces for residents to enjoy outdoor space. These spaces include high quality facilities including a pool deck, active and passive areas, extensive landscaping and vegetation infrastructure that will ensure healthy tree growth, that will complement the high quality public domain provided throughout the rest of the Town Centre.</p> <p>The pedestrian link would divide the residential common area, introducing a public thoroughfare and reduce the overall quantum of open space.</p>
incorporates landscaping to soften the built form in the Town Centre Core	The NE quadrant incorporates extensive landscaping that will soften the built form.
is useable, accessible and has a high level of amenity	<p>The Level 1 common open space of the NE quadrant will be accessible to all residents of the Town Centre, across all quadrants, accessed by lifts of each residential building. As outlined previously the space achieves high levels of amenity and will be useable by future residents.</p> <p>The pedestrian link would necessitate a bank of stairs at Henderson Road for users to cross the podium which would not be accessible for all users. Further, the link would not allow the quadrant to achieve the high level of amenity proposed by the alternative solution as the link would reduce provision of open space and separate the east and west areas by a public thoroughfare.</p>
is well integrated with dwellings and encourages indoor-outdoor living	<p>Buildings 10, 11, 12 and 13 all include garden apartments on the podium that will face the common open space of the NE quadrant, encouraging indoor-outdoor living.</p> <p>The pedestrian link would result in some garden apartments facing a public walkway rather than residential landscaped open space which does not achieve these performance criteria.</p>
provides opportunities for social interaction	<p>The common area will provide all residents with a large, connected space which will provide opportunities for incidental social interaction.</p> <p>The pedestrian link would separate the east and west common open spaces by a public thoroughfare reducing opportunities for social interaction. Concentrating pedestrian activity on Main Street will provide greater opportunities for social interaction.</p>

Consistent with this and following design development the podium link in the NE quadrant has not been included. Through site links are provided elsewhere within the Town Centre, including the Green Link in the SE quadrant and seven laneways through the retail areas providing the Town Centre with a compact, walkable and legible environment.

Section 3.0 (Key elements and urban structure) of the Design Guidelines state for Open Space:

Linear publicly accessible open space and / or through site links may be provided on the retail podiums and at ground level

Provision of an additional through site link at Ground Level between Henderson Road and Eat Street was considered however this was discounted for the following reasons:

- An additional site link into the centre at Henderson Road will have the effect of funnelling pedestrians into the retail centre and will have the effect of deviating footfall flows and stifling Main Street and Henderson Road of an active frontage of retail offer.
- If the main pedestrian streets (Main Street and Eat Street) are not successful, the Town Centre will be compromised by empty or under-performing tenancies.
- The change in levels from Henderson Road to Eat Street would require inclusion of stairs, ramps, escalators and terracing of any ground level pedestrian link that would represent a poorer outcome for the design, active frontage, layout and function of the Town Centre.

- The existing ground level street network and fine grain laneways remain consistent with the Concept Plan and allow pedestrians to move through the Town Centre in a logical manner.

We do not agree that there is an over-reliance of pedestrian activity on Main Street as Main Street was established under the Concept Plan to be the primary north-south pedestrian route of the Town Centre. The primary goal of any Town Centre is the success of its Main Street and with respect of this DA it is important to consider the future delivery of Stages 2 and 3 that will complete the retail and civic function of Main Street when considering the Town Centre overall. Main Street will run through the centre of Edmondson Park with pedestrians travelling east and west, north and south accessing the many parts the Town Centre. Accordingly, the proposed layout supports activation of the streets and laneways of the Town Centre more broadly than with the addition of a site link between Henderson Road and Eat Street would achieve.

3. Council Comment

- **High quality residential accommodation is provided at a range of medium to high densities**
- **Design of residential accommodation, in particular in mixed use settings, provides for a high level of amenity, including solar access, visual and acoustic privacy**

The proposed development does not provide a high-quality level of residential accommodation and amenity, especially where the proposed development does not comply with the ADG. This is not considered to be acceptable for a greenfield development of this nature. The applicant is required to adequately demonstrate how the above principles of the TCG have been achieved by the proposal.

Consistency with the ADG is addressed at Section 2.4.

4. Council Comment

- **The Town Centre has strong visual and physical connections to adjoining open space**

The proposed development does not adequately address this principle where development addressing Soldiers Parade, south of Eat Street and north of Greenway, is not sufficiently activated. This is also considered to be inconsistent with the approved master plan for FTC.

The cited principle relates to the connection between the public domain with open space outside of the FTC, such as the connection along Greenway with the Regional Park, and not the ground level activation with the internal town park. Notwithstanding this a response to Council's concerns is provided below.

The unique site conditions of Soldiers Parade south of Eat Street and north of Greenway and justification of activation of this space is provided at Section 2.1(2) and Section 2.5(2).

The illustrative Design Scheme submitted with MOD 4 always located services on Basement Level 1 with street access to Soldiers Parade consistent with the Concept Plan. This is repeated below at **Figure 35**.

As outlined previously, Soldiers Parade is appropriately activated and the section south of Eat Street, north of Greenway is activated by public art consistent with the Design Guidelines DS2.3 which states:

Where blank walls do occur, they are designed to incorporate vertical planting or public art

Notwithstanding, the Town Centre at this location achieves strong visual and physical connection at this location by the high architectural quality of the building and significant public art which will visually announce the Town Centre at Soldiers Parade, opposite Town Park, providing visual and physical connections to the open space.

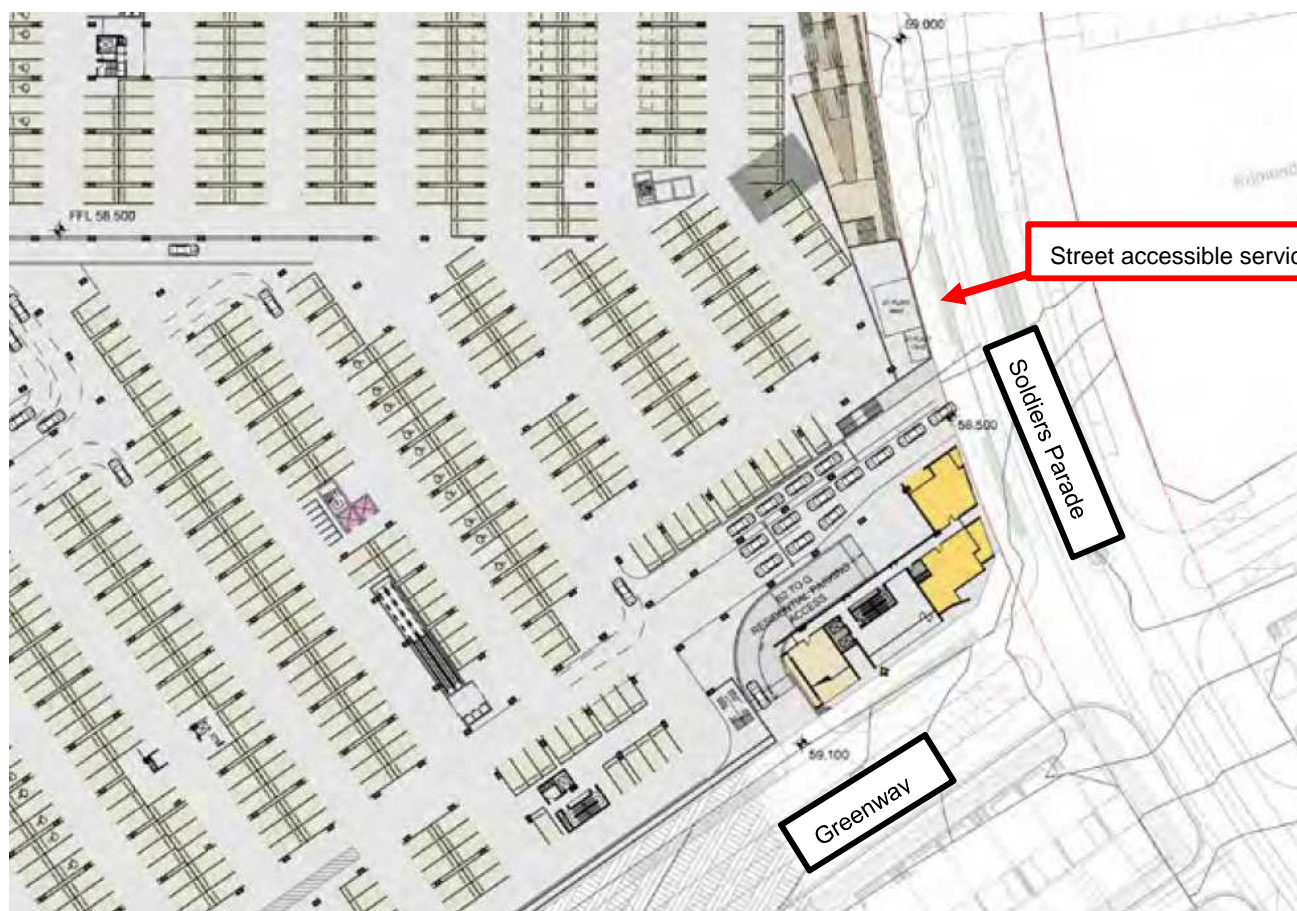


Figure 35 Illustrative Basement Level 1 Plan

Source: Section 75W Illustrative Design Scheme

It is also considered that the proposed change in level from Eat Street to Soldiers Parade would limit physical connection from Eat Street to the adjoining park land.

To ensure the best design outcome for the space a number of design options were investigated by HDR during design development that considered and balanced many needs including physical and visual connections but also safety for families in the context of a high young family demographic, topography and useability. The options analysis is provided by HDR at **Appendix B**.

These investigations (**Figure 36**) include designing Eat Street to be:

- A street open to traffic (Option 1)
- A pedestrian street capable of conversion for vehicle traffic (Option 2); and
- A pedestrian only street closed to traffic (Option 3).

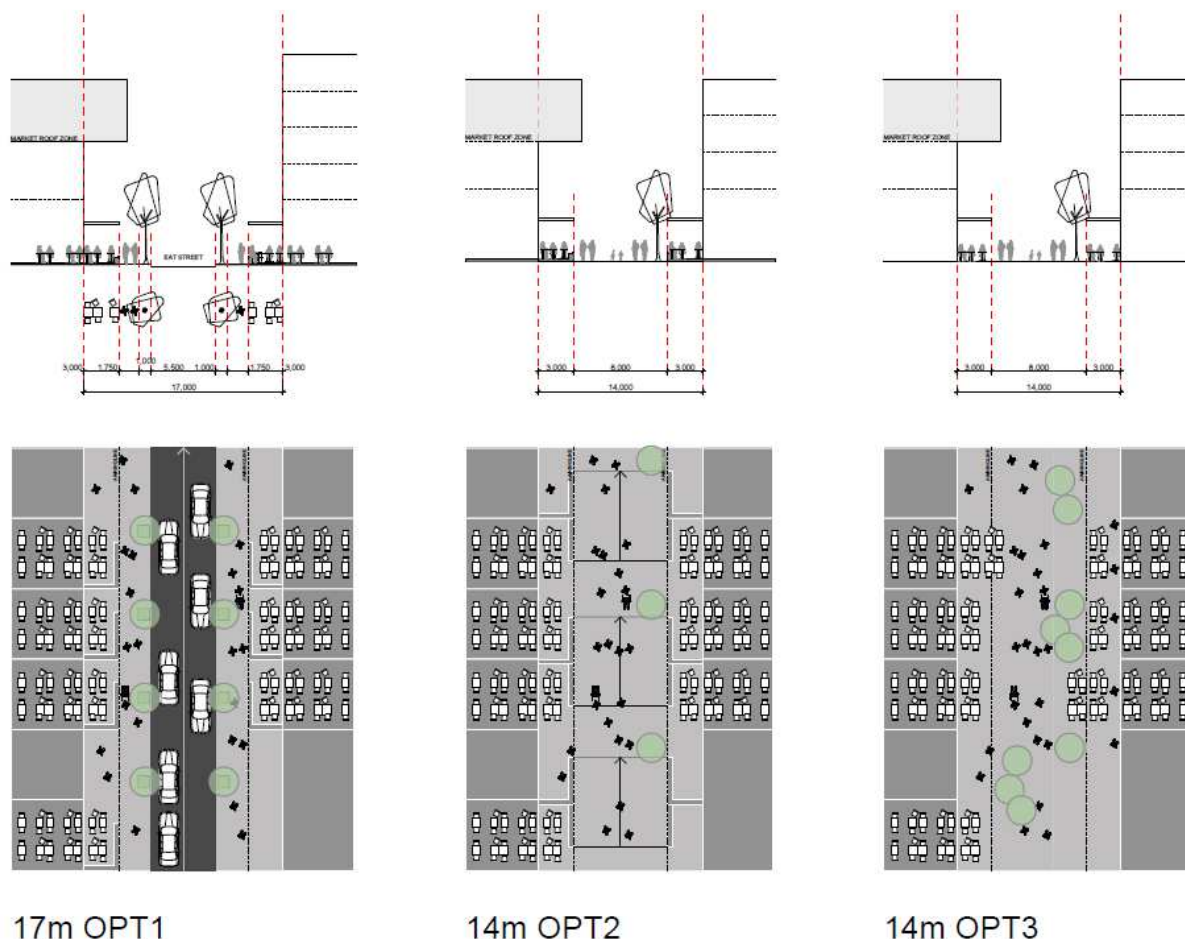


Figure 36 Eat Street Options analysis

Source: HDR

Option 1 and 2 allowed for Eat Street to be accessible by vehicles either permanently or as necessary and include multiple grade transitions to connect Soldiers Parade with Main Street. The analysis found Option 1 and 2 resulted in poorer outcome for the space as:

- Grade changes would require dining areas to be terraced, compromising the openness of these spaces;
- Ramps would require handrails and tactiles throughout Eat Street, introducing barriers to pedestrians;
- Tenancies would require ramps and steps complicating the streetscape; and
- Level changes compromised continuity within the Town Centre and would have ongoing impact to 'through' tenancies.

Option 3 is the preferred option and closed Eat Street to traffic, opening the space exclusively to pedestrians. The only grade transition is provided by stairs and ramp at the intersection of Soldiers Parade. The benefits to this arrangement include:

- All hazards are minimised with no need to provide terracing, ramps, handrail or stairs throughout Eat Street;
- More clear lines of sight to Town Park and Town Square;

- A level Eat Street provides continuity with the levels of the rest of the Town Centre;
- A level Eat Street allows for flexible tenancies on the same level and ‘through’ tenancies;
- Allows for more flexible outdoor dining arrangements enhancing the appeal of Eat Street as an alfresco precinct;
- Allows greater opportunities for soft landscaping;
- Centralising the grade change to the east frees up space within Eat Street that would otherwise be used for ramp and grade change infrastructure for more flexible arrangements of play equipment and landscaping opportunities.

The Public Domain Plan approved by the Concept Plan identifies Eat Street as a “pedestrianised street lined with outdoor dining and features a central activation zone with integrated play and seating”. To successfully achieve the alfresco precinct envisioned by the Concept Plan Eat Street needs to be level. The significant grade difference between Main Street and Soldiers Parade makes it impossible to provide Eat Street as a level space that connects to Town Square without accounting for the grade change as outlined in the options analysis above.

The preferred option was to separate Soldiers Parade from Eat Street by the incorporation of a grand stair that has many advantages, including:

- Heralds the arrival of the Town Centre with a grand gesture that leads pedestrians up and into the Eat Street pedestrian precinct;
- Provides an amphitheatre like grand stairs that will become a Town Centre focal point/meeting point;
- Resolves pedestrian/vehicle safety concerns by separating the pedestrian space from the busy Soldiers Parade;
- Provides an elevated plane to Soldiers Parade to enhance the pedestrian environment;
- Provides an informal seating platform for users to relax and appreciate views toward Town Park opposite; and
- Incorporates a ramp ensuring equal access for all users.

The Eat Street connection to Soldiers Parade is fully compliant with relevant BCA and DDA legislation. An assessment of accessibility is provided by MGAC at Appendix Q of the SEE. On balance, and in consideration of the issues raised above, the proposed design is considered the best approach.

2.6 Key elements and urban structure

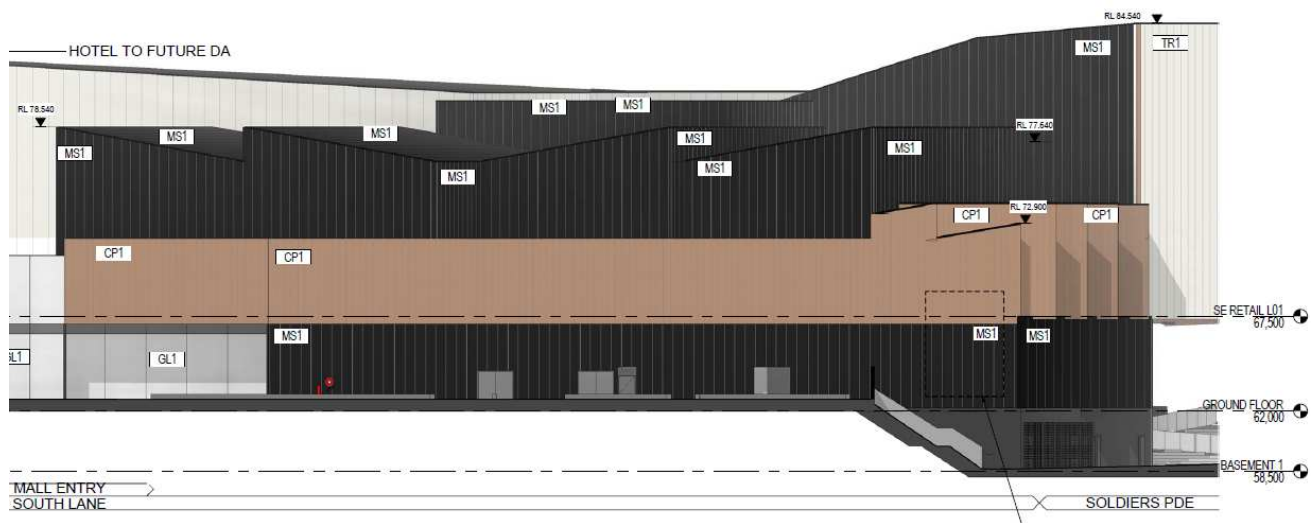
1. Council Comment

- ***Retail uses will utilise, and take advantage of, external areas, including level 1 balconies and terraces, to achieve enhanced activation throughout the Town Centre Core***

The proposed development does not achieve enhanced activation throughout the town centre core where the pedestrian laneway within the south-eastern quadrant provides a blank wall to the adjacent residential uses. The development shall be amended to activate this pedestrian laneway from the retail uses or alternatively is required to adequately demonstrate how the above characteristic of the TCG has been achieved by the proposal.

The Town Centre is consistent with the key element to provide retail that enhances activation in external areas across the Town Centre, including Level 1. The element does not require the complete activation of these spaces, rather the enhanced activation of these spaces. The design approach to the Green Link builds on the extensive activation offer throughout the Town Centre and additional activation of the Green Link is not considered necessary as there is an abundance of activity on all other frontages across the Town Centre.

Notwithstanding, additional public art and green wall infrastructure is proposed along the northern façade of the Green Link to further enliven this space consistent with the proposed indoor/outdoor play strategy proposed for the Green Link. Refer to the revised elevation plan for the Green Link at Appendix A and B and reproduced at Figure 37 and Figure 38 below.



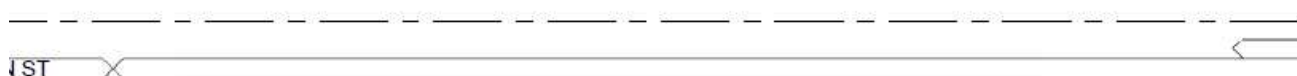
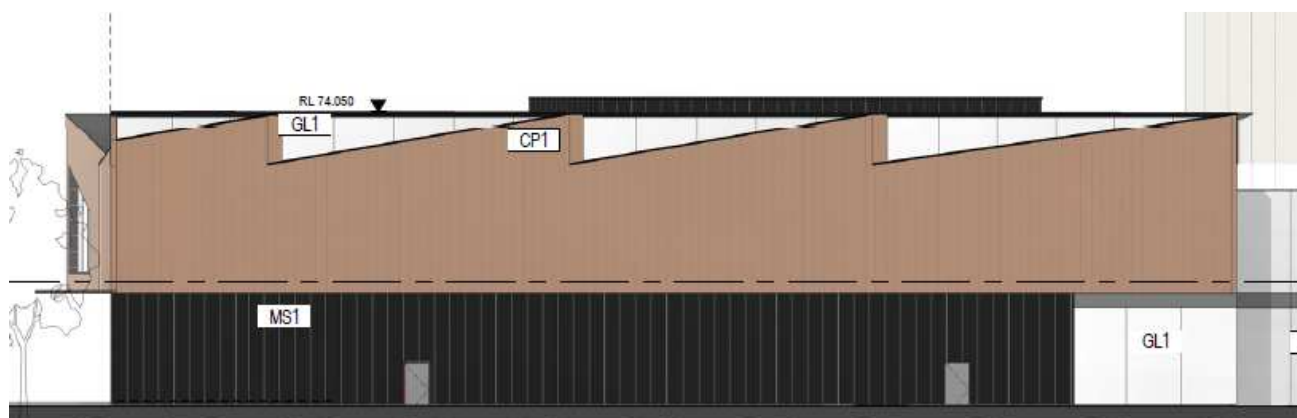
Submitted with DA



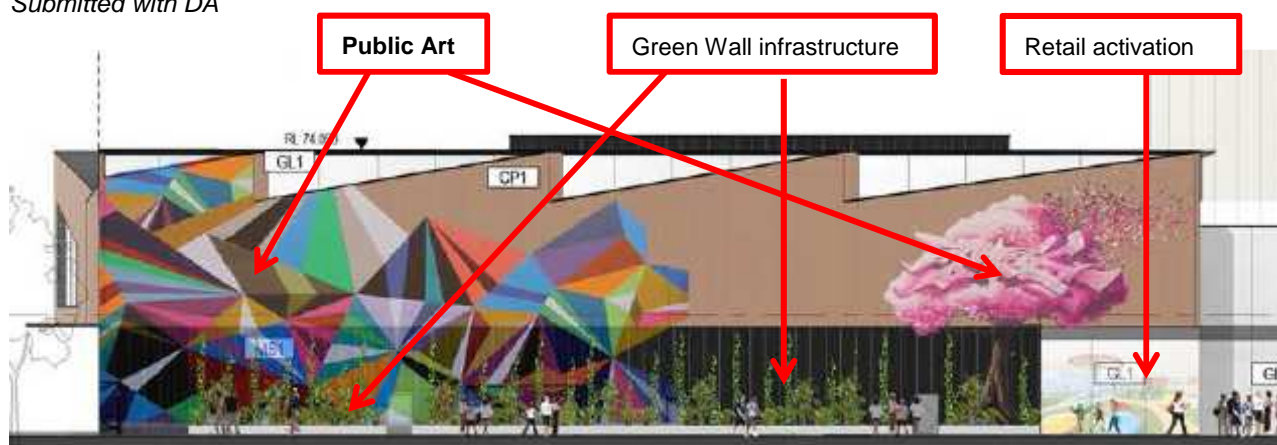
Proposed Amendment to DA

Figure 37 Green Link (East) elevation

Source: HDR



Submitted with DA



Proposed Amendment to DA

Figure 38 Green Link (West) elevation

Source: HDR

The Green Link is not identified as an activity street by Figure 2 of the Design Guidelines and has accordingly been activated thoughtfully by the retail and outdoor play adjacent to the retail entry point and connection path to Greenway. **Frasers are investigating outdoor play opportunities for the Greenlink that will further activate the domain as a family friendly location (refer to the playspace design advice prepared by Fiona Robbe at Appendix O and Figure 39 and Figure 40).** This is a logical location of activity which will be enhanced by the green wall and public art proposed to line the entire length between Main Street and Soldiers Parade.

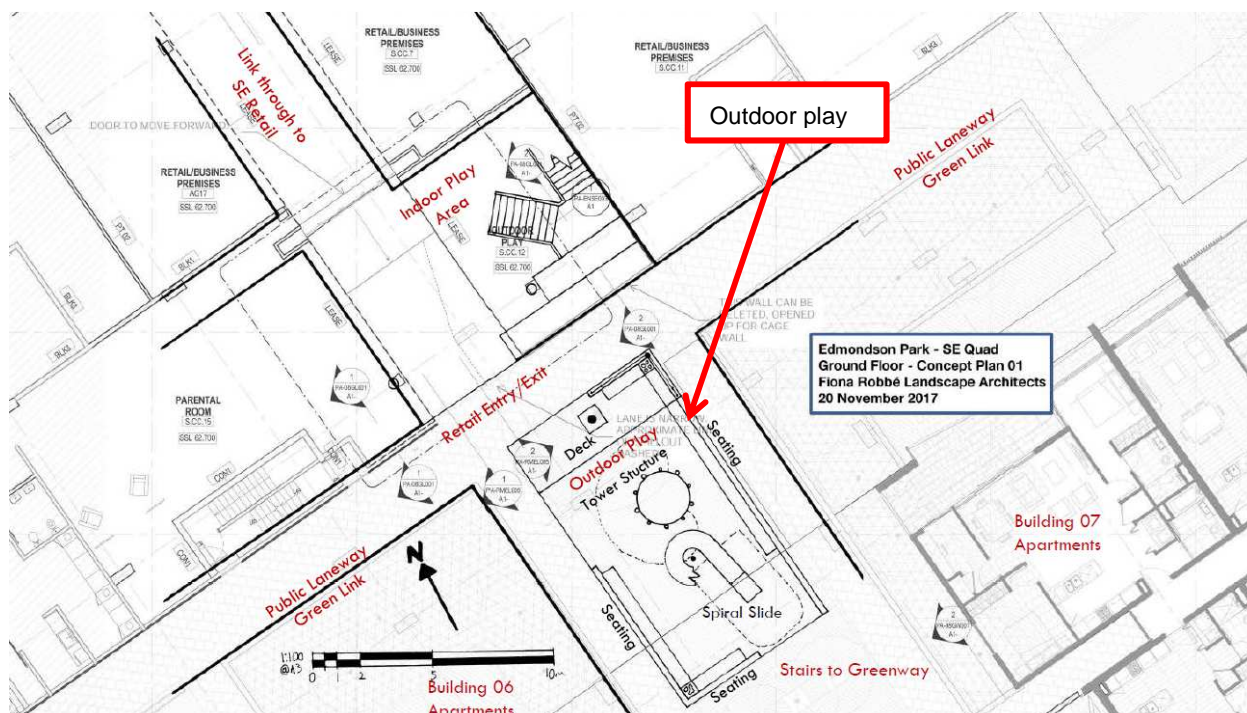


Figure 39 Outdoor play opportunity for the Green Link

Source: Fiona Robbe

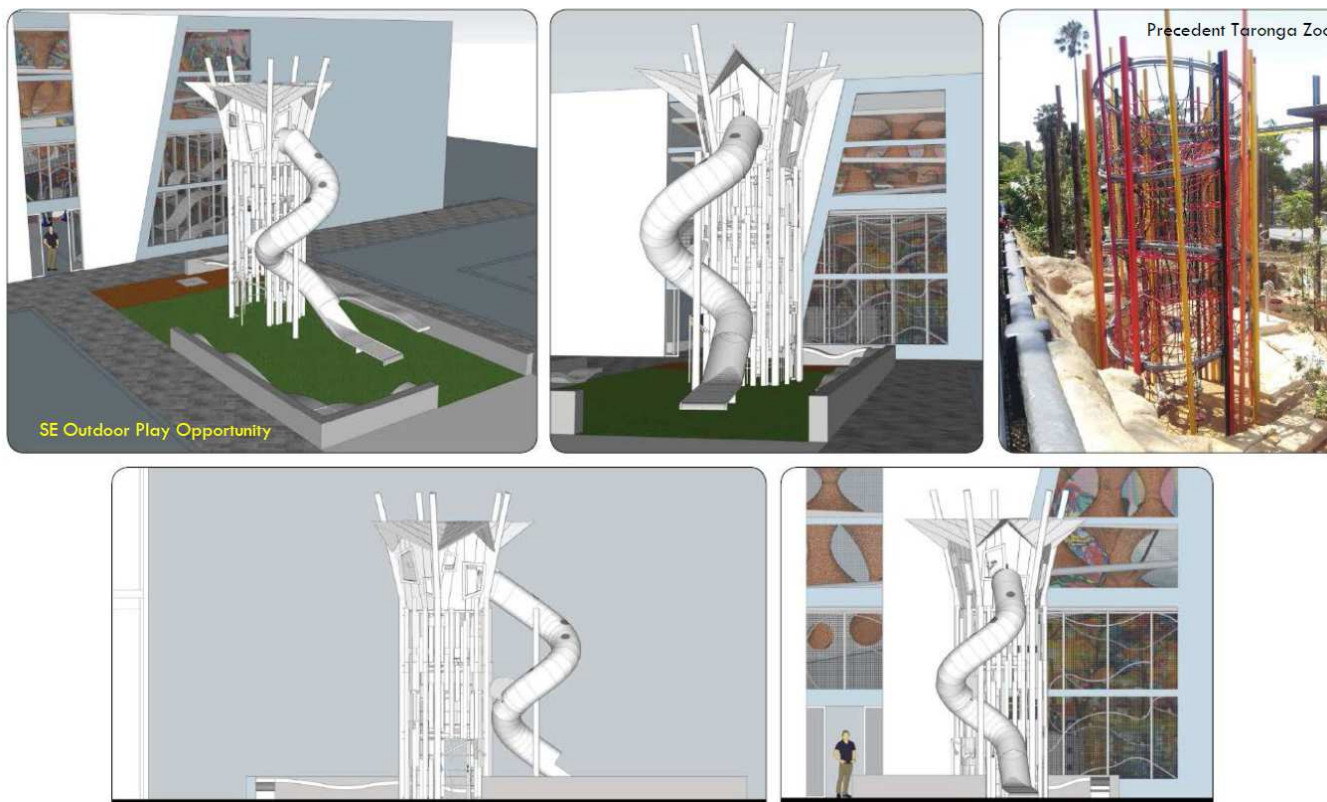


Figure 40 Outdoor play concept design

Source: Fiona Robbe

The retail entry from the Green Link is surrounded by active uses and retailers at these corners facing out to the pedestrian link. The retail tenancy to the south has an approximate 7 metre glazed façade facing the laneway, while the northern tenant is a food and drink retailer that includes an outdoor play area at the intersection of the Green Link. A plan view is provided at **Figure 41** and elevation view at **Figure 42** below.

The Green Link has a combined linear length of 198 metres. The entire southern side is activated by residential uses (except 17 metre separation between Buildings 6 and 7) and the northern side features 27 metres of activation around the retail entry point. The overall activation of the laneway equates to 148 metres or 77 percent of the Greenlink. The remainder features high quality landscape elements, a green wall and extensive public art to further activate the space.

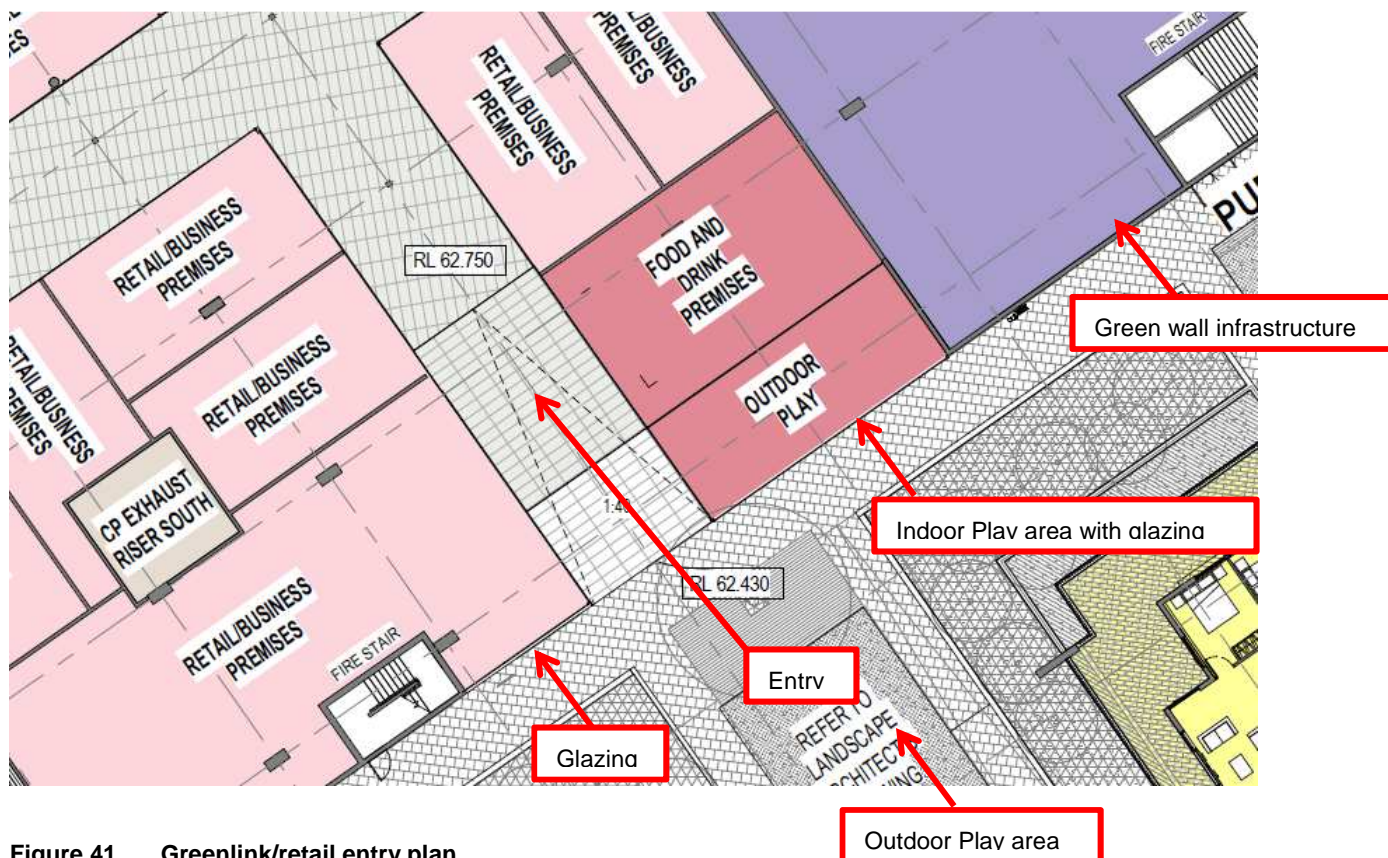


Figure 41 Greenlink/retail entry plan

Source: HDR

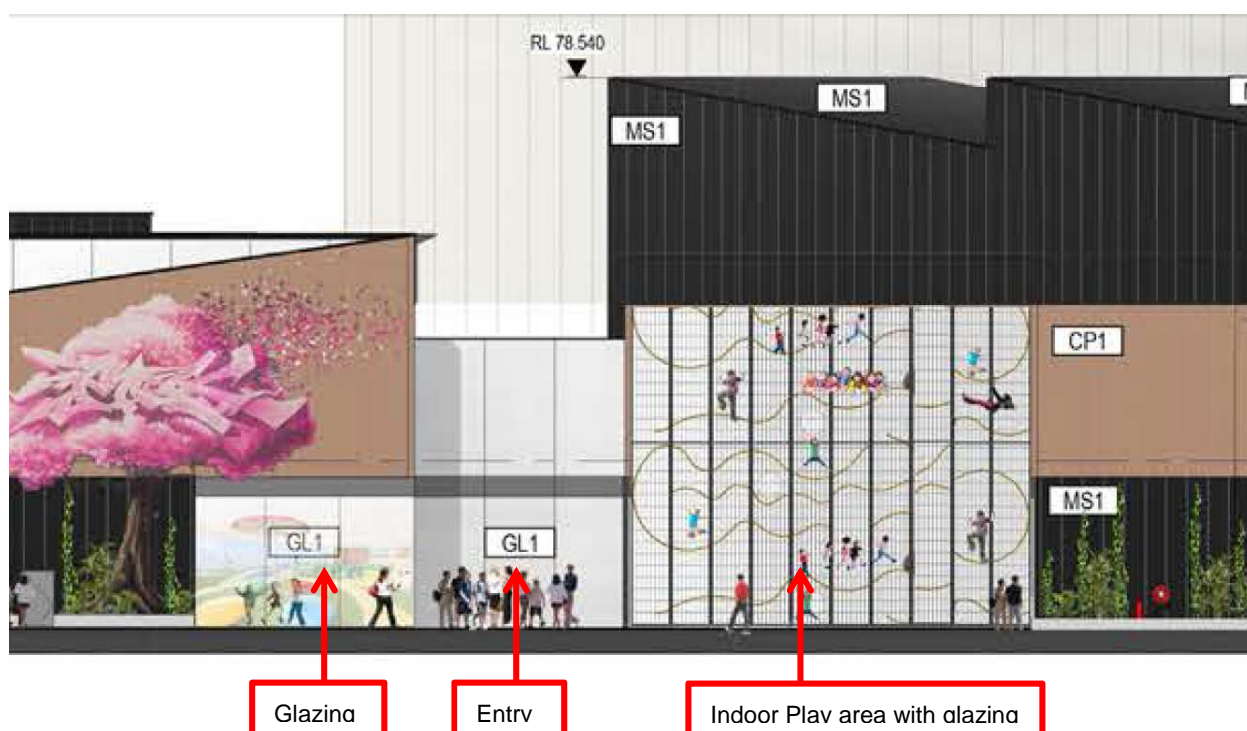


Figure 42 Green Link / retail entry elevation view

Source: HDR

2. Council Comment

- **Community uses are centrally located to maximise accessibility to all dwellings and to provide a strong civic presence in the Town Centre Core**

The proposed development does not achieve this characteristic as there is currently considered to be limited centrally located community uses and no civic presence. The omission of community uses in the eastern portion of the town centre core is also considered to be inconsistent with the master plan. The applicant is required to adequately demonstrate how the above characteristic of the TCG has been achieved by the proposal.

As outlined at Section 2.1(1) and 2.5(1) community uses are centrally focused on Town Square and Eat Street. Further community uses will be delivered by future stages. Frasers are working with Council on the VPA concurrently to determine what community uses Council want to be dedicated in the Town Centre.

3. Council Comment

- **The ground floor of buildings activate and engage with the street and public domain, in particular on the Town Square, Main Street and other activity streets**
- **Where appropriate within the Town Centre Core retail uses will assist in activating open space by spilling into these areas**

The proposed development does not adequately address the above characteristics where development addressing Soldiers Parade south of Eat Street and north of Greenway is not sufficiently activated. The development shall be amended to activate this part of the site or alternatively is required to adequately demonstrate how the above characteristic of the TCG has been achieved by the proposal.

The above characteristics are achieved by the Town Centre with substantial ground floor activation being provided, particularly Town Square, Main Street and the activity streets, Eat Street and Henderson Road. Soldiers Parade is not an activity street as per Figure 2 of the Design Guidelines.

Notwithstanding Soldiers Parade is a highly activated street with residential, retail and commercial uses lining the entire length with the exception of 6% of the frontage which accommodates street accessible services.

The above characterises states that “where appropriate” retail uses will “assist” in activating open space. Retail uses assist in activating this façade at the corner of Eat Street and Soldiers Parade. As outlined previously between the Eat Street ramp and the Green Link retail uses at Ground Level are not appropriate due to the low ceiling height caused by the topography change. This is further addressed at Section 2.1 (3), 2.4 (2) and (4).

4. Council Comment

- ***Streets complement parks to provide additional open space including through shade trees, landscaping and street furniture such as seating and lighting***

The proposed development does not adequately address the above characteristic where there is no provision for deep soil zones. The development shall be amended to provide deep soil zones or alternatively is required to adequately demonstrate how the above characteristic of the TCG has been achieved by the proposal.

These characteristics are achieved in the Town Centre by deliverer of a connected canopy of shade trees and landscaping throughout the public domain. Street furniture including seating and lighting is also provided that is consistent with the Public Domain Plan. Main Street, Town Square and Eat Street will be well vegetated spaces that will have a canopy and density of trees that is consistent with all surrounding streets that will complement local parks. This is consistent with the overall open space strategy and hierarchy of streets for the entire Town Centre, including outside the Town Centre Core. Hassell confirm (**Appendix C**) the on-structure vegetation infrastructure will support healthy tree growth, achieving the key element above.

5. Council Comment

- ***Other streets and laneways within the Town Centre Core will support Main Street by providing opportunities for complementary ground floor active uses***
- ***The movement network comprises major, minor and fine grain streets***

The proposed development does not adequately address the above characteristics where the pedestrian linkage from the train station running north-south to Eat Street is omitted from the DA. The development shall be amended to provide this pedestrian linkage as identified in the approved master plan or alternatively is required to adequately demonstrate how the above characteristics of the TCG has been achieved by the proposal.

As outlined at Section 2.5(2) the Town Centre comprises major, minor and fine grain streets as shown at **Figure 43**. Whilst inclusion of a pedestrian link between Henderson Road and Eat Street is not proposed, the Town Centre design remains consistent with the above elements by providing streets and laneways that will support Main Street and provide opportunities for ground floor active uses.

Inclusion of an additional link between Henderson Road and Eat Street will not meet the above key elements as it would encourage pedestrians to enter the retail centre at the expense of Main Street and the ground floor active uses in the public domain. A pedestrian link at Level 1 would also not meet this element as it would provide no benefit to Main Street or contribute to active ground floor uses. This is explored further at Section 2.1(2) and Section 2.5(2).

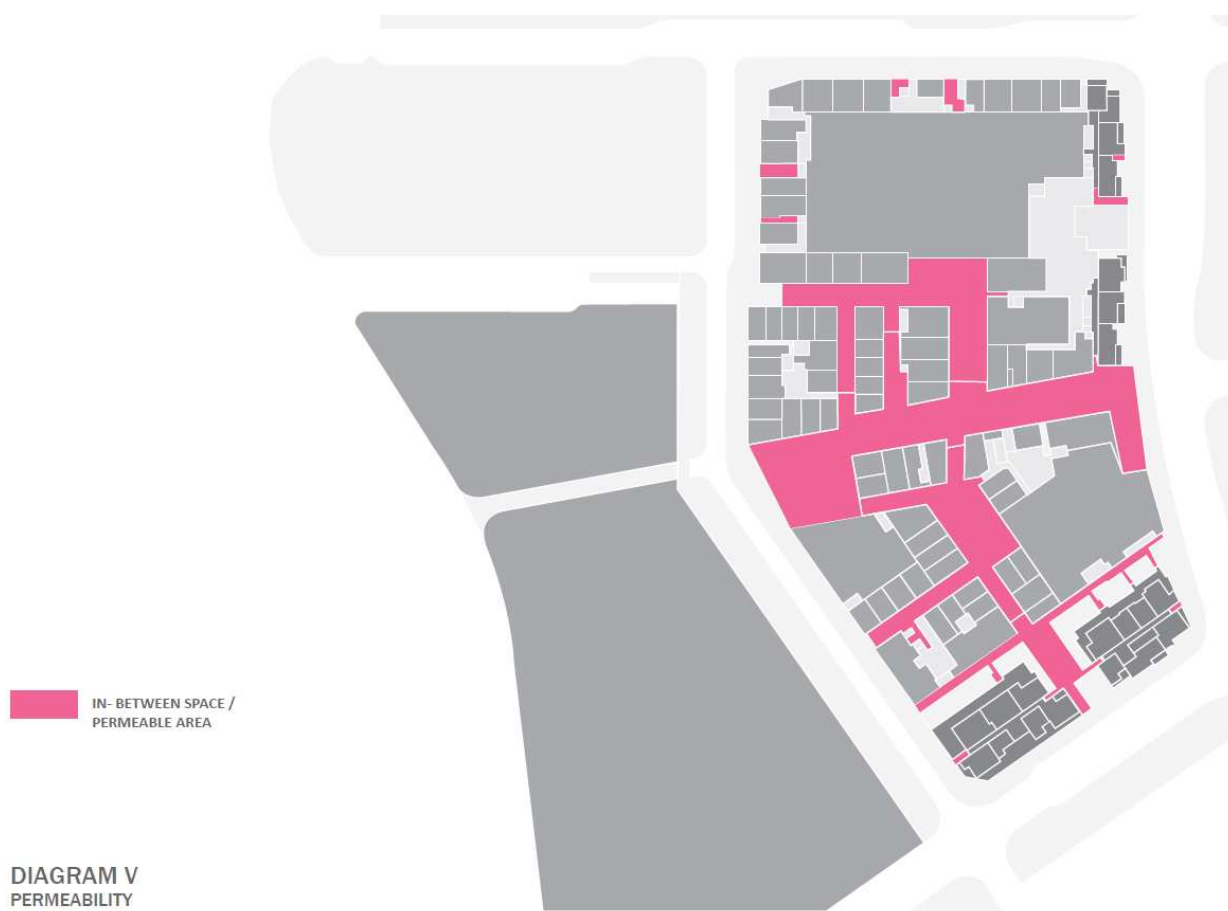


Figure 43 Minor and Fine Grain Links

Source: HDR

2.7 Town Centre Core Built Form Guidelines – Building Design

1. Council Comment

Performance Criteria

- **activate and engage with the street and public domain, including the creation of a vibrant Main Street**
- **reduce the appearance of building bulk and scale and to provide visual interest**

The proposed development does not adequately address the above performance criteria where development addressing Soldiers Parade south of Eat Street and north of Greenway is not sufficiently activated.

As discussed at Section 2.1(3) and 2.5(4) Soldiers Parade is well activated by residential, retail and commercial land uses with built form activating and engaging with the entire length of the street. Between Eat Street and Green Link the street level services between Eat Street and Greenway account for only 6 percent of the frontage which is minor, and the services are a necessary component of the Town Centre. The façade is proposed to be enhanced by public art which will provide visual interest and will further activate the space, consistent with Design Solution 2.3 which states:

Where blank walls do occur they are designed to incorporate vertical planting or public art

2. Council Comment

- *Where blank walls do occur they are designed to incorporate vertical planting or public art*

The proposed development does not achieve design solution where the pedestrian laneway within the south eastern quadrant provides a blank wall to the adjacent residential uses.

As outlined at Section 2.6 additional public art and green wall infrastructure is proposed along the Greenlink as shown at Appendix A and B.

3. Council Comment

- *The Soldiers Parade frontage between Henderson Road and the Greenway will be predominantly sleeved by residential, commercial or retail uses*

This is discussed at Section 2.1(3) and 2.5(4).

- *Retail or commercial uses are provided with a street address to the corners of:*
 - *Soldiers Parade and the Town Centre Core east-west street; and*
 - *Greenway and Main Street*

The proposed development does not adequately address the above design solutions where Soldiers Parade is not appropriately activated. The development shall be amended to appropriately activate this part of the site.

The plans have been amended to accommodate commercial offices at the corner of Greenway and Soldiers Parade and Greenway and Main Street, further activating this part of Soldiers Parade, consistent with the Design Guidelines. Refer to the amended plans at **Appendix A**.

4. Council Comment

- *have clear, legible access directly to the public domain*

The proposed development does not achieve this design solution where the pedestrian access from the train station to Eat Street in the north-eastern quadrant has been omitted from the site design. The development shall be amended to provide this pedestrian linkage or alternatively is required to adequately demonstrate how the above design solution of the TCG has been achieved by the proposal.

DS2.6 relates to supermarkets and other large retail uses. The supermarket in the NE quadrant and other large retail uses in the Town Centre all have clear, legible access directly to the public domain. The supermarket in the NE quadrant can be accessed from either Main Street or Eat Street via three different options in the public domain.

Notwithstanding the impact to the NE Quadrant supermarket; as outlined at Section 2.5 (1) providing a direct pedestrian link from Henderson Road into the NE quadrant would have a detrimental impact to the wider public domain and active uses by funnelling pedestrians into the retail centre. It would also be inconsistent with the Concept Plan.

5. Council Comment

- *are sleeved in smaller shops at the street frontage to encourage activity and minimise blank frontages*
- *fine grained building frontages are created by establishing vertical rhythms of residential and retail. Larger tenancies are sleeved by smaller tenancies.*

The proposed development does not achieve this design solution where the large retail use in the south eastern quadrant has not been entirely sleeved by smaller shops and is enclosed to the adjacent pedestrian laneway.

The retail tenancy adjacent to the laneway shares a wall with the Greenlink. **As outlined at Section 2.6(1) Frasers propose an alternative design solution to treat the entire wall with public art and green wall infrastructure which will enhance and provide visual interest to the space.** The alternative solution is consistent with the performance criteria for 4.2 Building Design as follows:

Table 3 Performance Criteria PC2 Building Design

Performance criteria	Design Solution
define streets and other parts of the public domain	The green wall and public art will be a bold and striking element that will define the Greenlink.
activate and engage with the street and public domain, including the creation of a vibrant Main Street	As outlined at Section 2.6(1) active residential and retail uses account for 77 percent of the Greenlink. The proposed public art and green wall will further activate and engage with the public domain.
provide high levels of amenity to residents, workers and the public domain	There is extensive retail in the vicinity of the Greenlink that will service the local population. The proposed green wall and public art will form a counter point in the locality with a destination that will allow residents and works to dwell in the Greenlink, rest and enjoy the amenity provided by the unique treatment proposed.
reduce the appearance of building bulk and scale and to provide visual interest	The green wall and public art will reduce the appearance of bulk and scale and will provide visual interest.
feature excellence in contemporary architectural design	The alternative solution is consistent with the high quality, contemporary architectural design provided throughout the Town Centre. The public art will extend and meet with art proposed to spill out on Soldiers Parade in a manner that compliments the architectural language of the whole Town Centre.

Further it is noted that the Green link is a secondary pedestrian link and that the proposed development otherwise achieves the above design solutions for the primary street frontages.

2.8 Town Centre Core Built Form Guidelines – Open Space

1. Council Comment

Performance Criteria

- *incorporates landscaping to soften the built form in the Town Centre Core*
- *is useable, accessible and has a high level of amenity*

The proposed development does not adequately address the above performance criteria where deep soil zones are not provided within the town centre core, especially the town centre square.

The Town Centre delivers shade trees and landscaping that is consistent with the Public Domain Plan that will soften the built form in the Town Centre. Main Street, Town Square and Eat Street will be well vegetated and highly useable spaces that will have a connected canopy and density of trees that is consistent with all surrounding streets providing a high level of amenity. Hassell confirm (**Appendix C**) the on-structure vegetation infrastructure will support healthy tree growth, achieving the key element above. Deep soil is further discussed at Section 2.1(4) and 2.4(2).

2. Council Comment

- *is well integrated with dwellings and encourages indoor-outdoor living*

The proposed development is not considered adequately address the above performance criteria where the development does not comply the ADG requirements for COS, especially in the south east quadrant.

Compliance with the ADG is discussed at Section 2.4 (1). The proposal provides a compliant amount of Common Open Space (44.3%).

The common area and pool deck in the NE quadrant is available to all residents of the Town Centre (shown below). The open space amenity offered to residents is high quality and well integrated to encourage indoor-outdoor living.



Figure 44 Artists impression of the Level 1 pool deck

Source: HDR

3. Council Comment

Design Solutions

- ***Private and communal open space is provided in accordance with the Apartment Design Guide***

The proposed development does not to comply with the ADG with regards to the provision of COS and this is not considered to be acceptable for a greenfield development of this nature

Compliance with the ADG is discussed at Section 2.4 (1). The proposal provides a compliant amount of Common Open Space (44.3%).

4. Council Comment

- ***Linear publicly accessible open space is provided on the retail podiums to provide additional connectivity and activation through the Town Centre Core***

The applicant is required to adequately demonstrate how the above design solution of the TCG has been achieved by the proposal, especially with regards to the RFB's in the south eastern quadrant,

With reference to the NE quadrant, refer to Section 2.5(2).

With reference to the SE quadrant, refer to Section 2.6(1) and Section 2.7(5).

2.9 Town Centre Core Built Form Guidelines – Vehicle parking, access and manoeuvring

1. Council Comment

Performance Criteria

- *is safe, functional and convenient*

The proposed development does not adequately address the above performance criteria where there is concern raised to the functionality of the loading dock at Basement Level 2 and where there is considered to be potential for conflicts/ safety issues between the residential and commercial parking areas. The applicant is required to adequately demonstrate how the above performance criteria of the TCG has been achieved by the proposal.

As outlined at Section 4.17.2 and 4.17.5 of the SEE and as shown in the Architectural Plans at Appendix A of the SEE retail and residential car parking are separated by security fencing and security gates which will separate users and restrict movement of pedestrians between these areas.

Access and separation of retail and residential car parking is provided as follows:

Retail

- Public access to the retail car park is available from Soldiers Parade and the temporary access road to be constructed to Bernera Road.
- Users pass through a ticketed gate upon entry and exit out of the retail car park.
- Retail vehicles are unable to access the residential parking area due to the presence of a floor to ceiling security fence and gates that separate these areas.

Residential

- Residential vehicles can access the residential car park via a dedicated residential vehicle access ramp and security gate from Greenway Road. Residents will be issued an electronic pass which will allow entry through the security gate. Retail users cannot pass through this entry.
- A floor to ceiling security fence separates retail and residential car parking.
- Security gates are located at two points between the retail and residential parking areas allowing residential vehicles to enter and exit the residential car park area by scanning their electronic pass.

An excerpt of Drawing DA16 (Appendix A of the SEE) is provided below that highlights the security fence and security gate arrangement.



Figure 45 Basement Level 2 layout and features

2. Council Comment

Design Solutions

- ***Sufficient provision is provided on-street for removal vehicles***

The applicant is required to adequately demonstrate how the above design solution of the TCG has been achieved by the proposal.

Loading and unloading of vehicles will be undertaken from the street in front of each residential building on land subject to the Roads and Infrastructure DA (1260/2016) currently under assessment by Council. Whilst the spaces in front of each building is available for a loading zone Council has specifically asked that Frasers do not submit street signage plans as part of the Roads and Infrastructure DA. Frasers will need to work with Council to allocate loading zones and general parking as part the Construction Certificate approval for 1260/2016.

3. Council Comment

- Where possible, car parking is located generally below ground

Note: except where fronting Main Street or an activity street, car parking may protrude above ground level by a maximum of 1.5m for ventilation purposes subject to streetscape considerations and screening by landscaping. On-street car parking within the public domain is also acceptable

The applicant is required to provide plans with dimensions that demonstrate how the above design solution of the TCG has been achieved by the proposal for assessment, especially for Soldiers Parade.

The car park is generally located below ground across the entire Town Centre. Due to change in topography Soldiers Parade slopes from north to south resulting in various aspects of the Town Centre sleeving the car park at different levels. At no point across the Town Centre does the car park protrude for ventilation purposes and it is not above ground where it is not sleeved by another use.

For example, at the north end of Soldiers Parade, the car park is sleeved by the lobbies and ground floor apartments of Buildings 12 and 13. To the south, the car park is sleeved by Building 7. Between Eat Street and the car park entry north of Building 7 the car park is sleeved by the eat street ramp and services that require street access and include a fan room, fire control room, fire hydrant and sprinkler booster assembly, sprinkler alarm valve enclosure, south-east quadrant main switch room and south-east quadrant substation. A section showing this arrangement, with dimensions, is provided at **Figure 48** below.

Accordingly, the car park accords with the above requirements.

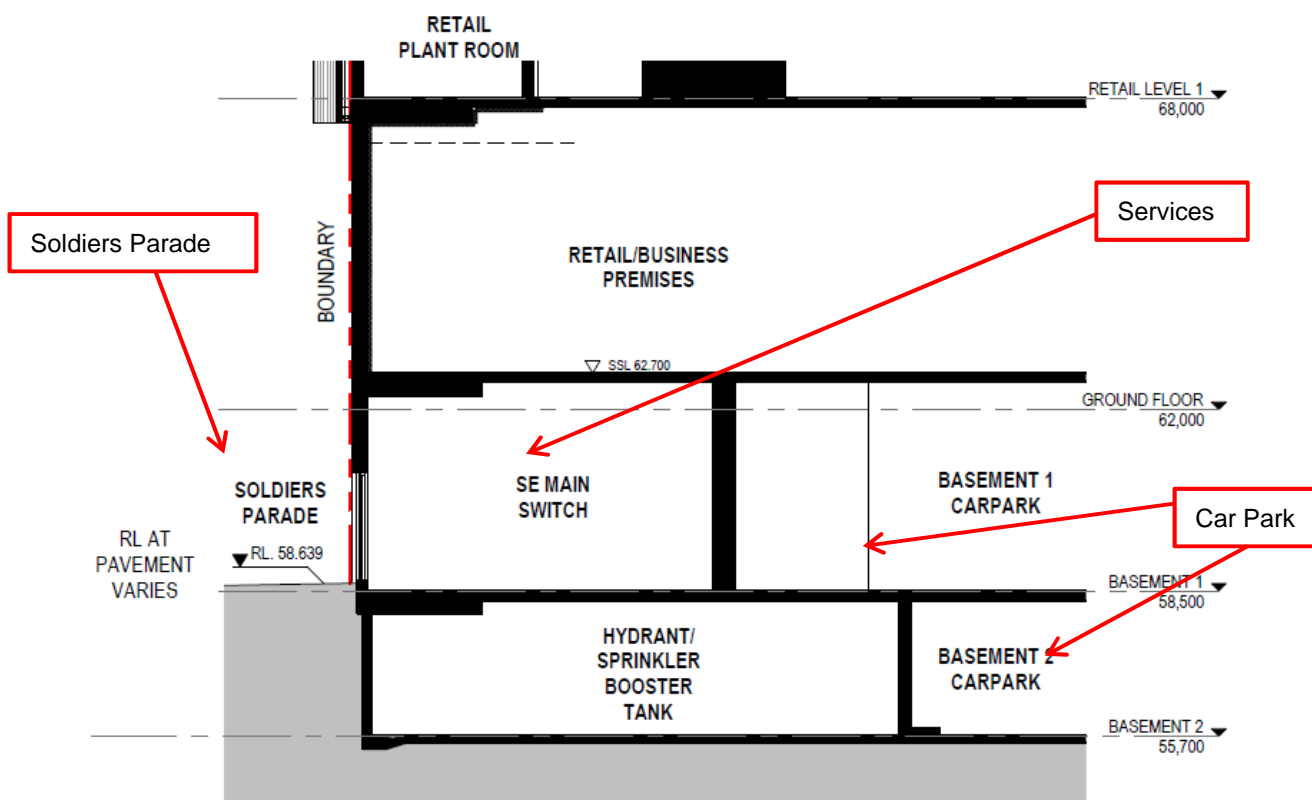


Figure 46 Cross Section of SE Main Switch room and Soldiers Parade in the SE quadrant.

4. Council Comment

- **Commercial and retail development is provided with adequate change and shower facilities for cyclists. Facilities are located conveniently close to bike storage areas.**

The applicant is required to provide information that demonstrates how the above design solution of the TCG has been achieved by the proposal for assessment.

The end of trip facilities including bike storage and change facilities are co-located on Basement Level 1 behind Building 12 (refer to Architectural Drawing DA17). Access to this space is made from Soldiers Parade as shown in **Figure 47** below.

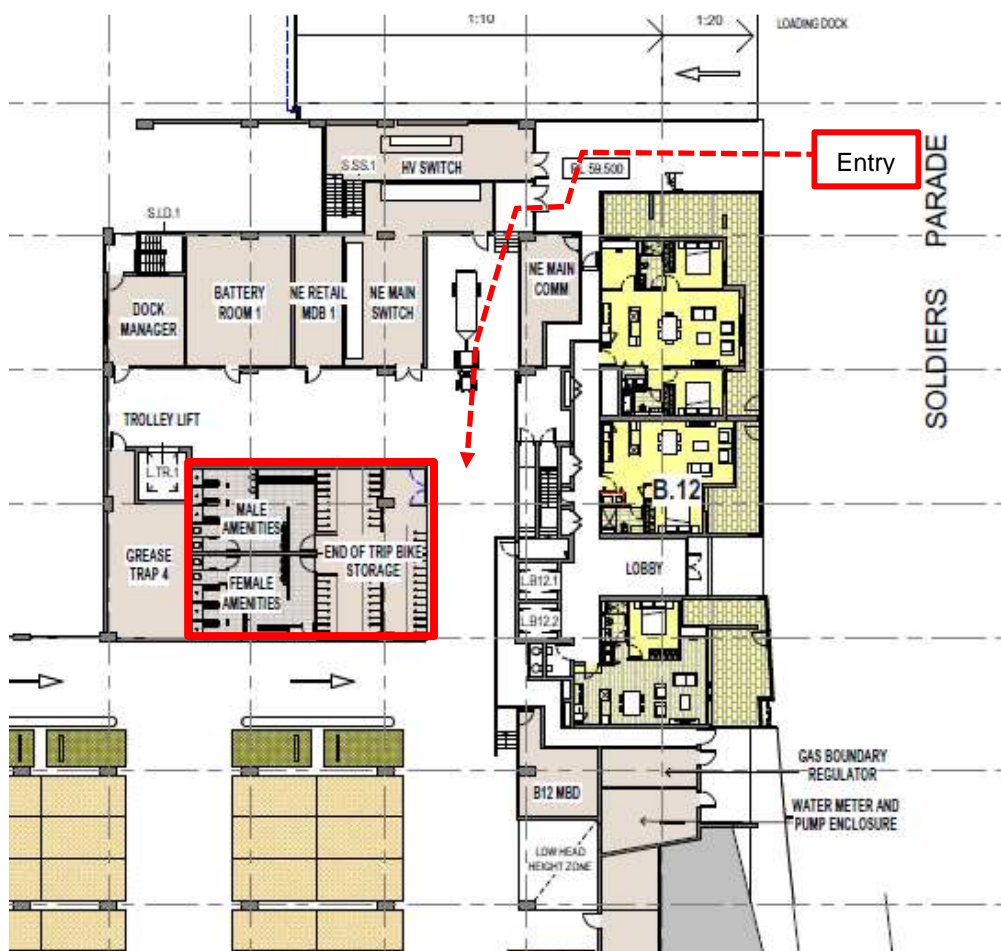


Figure 47 Location and access to end of trip facilities

Source: HDR

2.10 Town Centre Core Built Form Guidelines – Residential Amenity

1. Council Comment

Performance Criteria

- ***Residential accommodation is provided with a high level of amenity, including functional, private and communal areas with access to adequate sunlight and daylight, natural ventilation, outlook and views, visual privacy, acoustic privacy and protection from other environmental nuisance such as odour, dust and vibration***

The proposed development does not provide a high quality level of residential amenity. The proposed development does not comply with the ADG and this is not considered to be acceptable for a greenfield development of this nature.

Compliance with the ADG is discussed at Section 2.4. Where any variation to the ADG is required, this has been justified in this response and the SEE submitted with the DA.

2. Council Comment

Design Solutions

- ***Residential apartment development is designed to meet the requirements of the Apartment Design Guide.***

The proposed development does not comply with the ADG and this is not considered to be acceptable for a greenfield development of this nature.

Compliance with the ADG is discussed at Section 2.4. Where any variation to the ADG is required, this has been justified in this response and the SEE submitted with the DA.

2.11 ESD

Design Solutions

- ***Retail development achieves a 6 Star Green Star Design & As-built v1.1 rating for the town centre retail.***
- ***Residential apartment buildings achieve a 5 Star Green Star Design & As-built v1.1 rating.***

The applicant is required to provide information that demonstrates how the above design solutions of the TCG have been achieved by the proposal for assessment.

WSP provided a scorecard pathway that demonstrates how the proposal will achieve the above ratings. This was provided at Appendix N of the SEE and is repeated at **Figure 48** below. It shows the residential and retail components will exceed the score required to achieve the rating proposed.

Frasers would be happy to accept a condition of approval that would require Frasers to submit to Council evidence that the design solution has been achieved. i.e. *Prior to the issue of the relevant occupation certificate, Frasers is to submit evidence to Council that:*

Retail development achieves a 6 Star Green Star Design & As-built v1.1 rating for the town centre retail; and Residential apartment buildings achieve a 5 Star Green Star Design & As-built v1.1 rating.

Resi	Targeted Rating	5 Star - Australian Excellence					60 points are required for a 5 Star rating
	Total Point Score	64.5					
	Total Point TBC	14					

Retail	Targeted Rating	6 Stars - World Excellence					75 points are required for a 6 Star rating
	Total Point Score	77.0					
	Total Point TBC	9					

Index	Credit	Points Available	Resi Points Targeted	Resi Points TBC	Retail Points Targeted	Retail Points TBC	Space Type Applicability
MANAGEMENT		14	14	-	14	-	
1	Green Star Accredited Professional	1	1	-	1	-	
2	Commissioning and Tuning	4	4	-	4	-	
3	Adaptation and Resilience	2	2	-	2	-	
4	Building Information	2	2	-	2	-	
5	Commitment to Performance	2	2	-	2	-	
6	Metering and Monitoring	1	1	-	1	-	
7	Construction Environmental Management	1	1	-	1	-	
8	Operational Waste	1	1	-	1	-	
INDOOR ENVIRONMENT QUALITY		17	10	5	10	3	
9	Indoor Air Quality	4	1	3	3	-	
10	Acoustic Comfort	3	3	-	2	-	
11	Lighting Comfort	3	3	-	2	1	
12	Visual Comfort	3	-	2	-	2	
13	Indoor Pollutants	2	2	-	2	-	
14	Thermal Comfort	2	1	-	1	-	
ENERGY		22	8	3	15	3	
15	Greenhouse Gas Emissions	20	6	3	13	3	
16	Peak Electricity Demand Reduction	2	2	-	2	-	
TRANSPORT		10	6	1	6	1	
17	Sustainable Transport	10	6	1	6	1	
WATER		12	8	-	8	-	
18	Potable Water	12	8	-	8	-	
MATERIALS		14	7	1	9	-	
19	Life Cycle Impacts	7	3	-	5	-	
20	Responsible Building Materials	3	3	-	3	-	
21	Sustainable Products	3	-	1	-	-	
22	Construction and Demolition Waste	1	1	-	1	-	
LAND USE & ECOLOGY		6	1	-	1	-	
23	Ecological Value	3	-	-	-	-	
24	Sustainable Sites	2	-	-	-	-	
25	Heat Island Effect	1	1	-	1	-	
EMISSIONS		5	4	-	4	-	
26	Stormwater	2	2	-	2	-	
27	Light Pollution	1	1	-	1	-	
28	Microbial Control	1	1	-	1	-	
29	Refrigerant Impacts	1	-	-	-	-	
INNOVATION		10	7	4	8	2	
30	Innovation	10	7	4	8	2	
TOTAL		110	65	14	75	9	

Figure 48 Rating Scorecard Pathway

Source: WSP

2.12 Environmental Health

Council's Environmental Health section has reviewed the proposal and provided the following comments to be adequately addressed by the applicant:

The submitted 'Edmondson Park Town Centre – Development Application Noise Assessment' prepared by Wilkinson & Murray (report no: 16178-T – Version B) dated August 2017 focused primarily on assessing rail noise and internal noise levels. When referring to the Infrastructure SEPP (2007), it is apparent that the proposal would be traffic generating development. Therefore, the acoustic report shall be amended to comprehensively assess the noise impact of the proposal, sleep disturbance and traffic noise impacts shall be determined in accordance with the NSW Road Noise Policy (EPA, 2011).


Wilkinson Murray has prepared a response to these comments (**Appendix K**) and state:

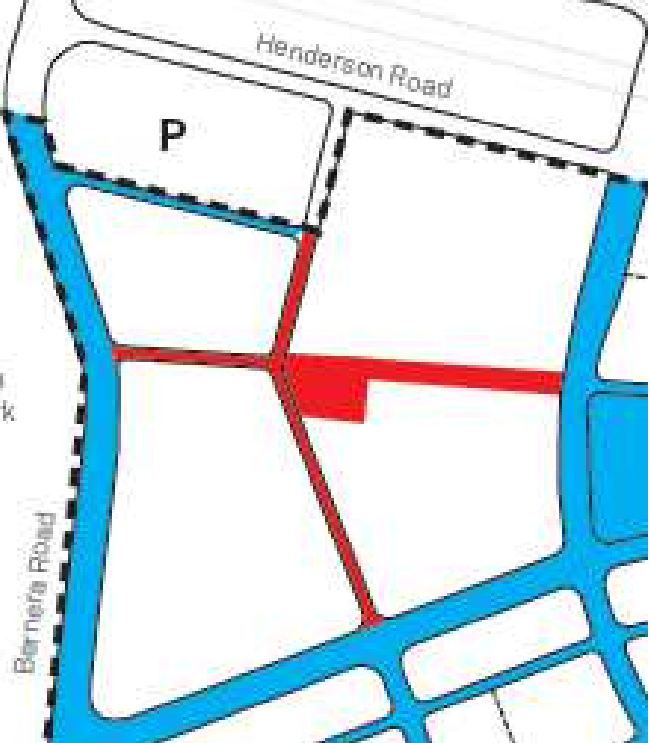
"The EPA's Road Noise Policy states " Note: Land use developers must meet internal noise goals in the Infrastructure SEPP (Department of Planning NSW 2007) for sensitive developments near busy roads (see Appendix C10)". In the case of the Infrastructure SEPP its application is mandatory where traffic flows of 40,000 vehicles a day or more occur on surrounding roads. The Town centre development will not generate traffic noise on roads surrounding the town centre anywhere near 40,000 vpd. Therefore assessment with respect to the Infrastructure SEPP or EPA's Road Noise Policy is not required or necessary."

2.13 Strategic Planning

A response to the Strategic Planning Section is provided below.

Table 4 Response to Strategic Planning Comments

The development must be designed to fully comply with the Frasers Town Centre Design Guidelines, as amended by FEAR 1.3C.	The proposal is largely consistent with the Design Guidelines. Where an alternative design solution is sought, this has been addressed consistent with the requirements of the Design Guidelines.
All external awnings should provide continuous weather protection, to encourage the movement of people on streets surrounding the development.	Awnings are generally proposed along retail frontages to provide protection from the elements as shown on Architectural Drawing DA12 at Appendix A of the SEE.
FEAR 1.3C c) requires that the Design Guidelines are amended "to require the Soldiers Parade frontage between Henderson Road and the Greenway will be predominately sleeved by residential, commercial or retail uses". The intent of this modification is to activate the streetscape and minimise the use of blank façades. It is noted that there is a large expanse of blank wall between the eat street and the retail parking entry, as shown in the figure below. It is considered that the urban design response in this location is poor, given that Soldiers Parade will be a significant conduit of people throughout the town centre. This wall is hard against the street edge, and provides no amenity value.	Refer to Section 2.1(3), 2.2.5(2), 2.5(4), 2.2.6(3) and 2.7(1).
The location of a fire stair from the basement car-park (to the west of the development and near the Pavilion) appears to obstruct the future development of urban street. If this is a temporary fire stair, details should be provided as to transitional arrangements when the town centre is expanded and urban street is constructed.	The fire stairs along the western edge of main street are temporary for stage 1 and will be replaced with relocated permanent fire stairs for future stages that will ensure Urban Street will not be obstructed.
Further details surrounding the land ownership and subdivision of the Town Square need to be clarified and provided for assessment.	<p>The Concept Plan establishes land ownership across Edmondson Park. Refer to the Open Space titling Plan of the Public Domain Plan (page 16 and below) and repeated below. All land subject to this DA will remain in ownership of Frasers Property. A stratum subdivision plan was submitted with the DA at Appendix F of the SEE.</p> <p>Open Space Titling Plan</p>  <p>Edmondson Park Frasers Town Centre Site Boundary</p> <p>Frasers Property Australia</p> <p>Liverpool City Council</p> <p>Note: Areas of parks shown to be determined in future.</p>

	 <p>Open space titling plan Source: Public Domain Plan</p>
<p>Table 1 of Part 3 of the Design Guidelines indicates that the town centre will support a mix of retail, office, entertainment, community, and medium-high density residential uses. It is noted that there are no provisions in the northeast and southeast quadrants for commercial office space. Whilst the Edmondson Park Town Centre should not compete directly with the Liverpool and Leppington centres for commercial uses, the development is not proposing any floor-space for higher order employment opportunities which is not considered acceptable.</p>	<p>Refer to Section 2.14 below.</p>

2.14 Economic Development

Council's Economic Development section has reviewed the proposal and provided the following comments to be adequately addressed by the applicant:

"In addition, we would like to see further consideration of commercial space for professional organisations to locate and work from an A grade office space would be preferable in an area which could potentially service the Western Sydney Airport."

A shared or co-working space would also be beneficial in the town centre in order to cater for, and support, the potential growth of the working from home and innovation clusters that may develop in the area. This would facilitate the creation of another 50 or so jobs and assist to create an innovation and entrepreneurial atmosphere in the area. The site's location in proximity to the train station is also an opportunity to leverage growth in the tertiary education sector as well as outdoor and night time economy sector creating a potential further 100 jobs."

Frasers investigations indicates demand for office space and co-working facilities in the short term is very limited, although this demand may increase as the Western Sydney Airport develops. **The design have been amended to**

provide additional commercial floor space at the intersection of Greenway and Soldiers Parade and the intersection of Greenway and Main Street that will meet demand for this space. Frasers will explore shared working spaces or slightly bigger floor space office area opportunities in the western part of the Town Centre as part of future stages.

The viability of a tertiary education facility will be largely dependent on the development of the School currently under consideration for the south-west quadrant. Frasers is currently in discussions with the Department of Education and will consider tertiary education as part of the future western town centre. Frasers are also exploring a medical day clinic for the western stage.

The Town Centre will feature a lively outdoor and night time economy with uses that will be open late including the inclusion of a cinema and 25 food and drink premises across Town Centre East. At this stage, and subject to future change, it is expected that the external fronted premises will include:

- 14 restaurants;
- 3 cafes; and
- 2 fast food outlets.

A further café and 5 kiosks will be internally fronted.

At this stage the Town Centre is expected to provide approximately 1,197 jobs annually. Future stages may introduce additional complimentary uses that will enhance the Town Centre economy and provide additional employment opportunities.

2.15 Waste Management

A response to the Waste comments is provided below. **The Waste Management Plan has been amended accordingly, at Appendix N.**

Table 5 Response to Waste Comments

Comment	Response
The largest bins that can be provided by Council to the residential component of the development are 660 litre bins and the ratio is 1:6. With a twice weekly collection service, bin storage areas would have to be allocated for a total of 70, 660 litre bins (35 waste and 35 recycle). The current waste management plan (WMP) refers to 1100 litre bins which are no longer available and also incorrect numbers of 7 waste and 18 recycling are provided. In addition to housing the required number of bins, the bin storage rooms must allow for separation of recycling and garbage bins to avoid contamination and sufficient room to access and manoeuvre bins.	The Waste Management Plan has been amended to account for 660L bins. Refer to Section 2.2 of the Waste Management Plan (Appendix N) for complete assessment.
The WMP refers to compactors for the commercial component of the development, which is separate from the residential bin storage. This service will not be provided by Council and a private waste operator needs to be organised.	The collection services for the compactors are expected to be provided by a commercial waste contractor.
The WMP also refers to compactors for the residential waste. This is not considered acceptable and as per the Waste Management Services for RFBs and MUDs fact sheet, if compaction units are used it will be on a weekly service only, which results in the proposed bin numbers doubling.	Council's documentation (Fact Sheet - Waste Management Services For Residential Flat Buildings And Multi Dwelling Housing) allows for waste to be compacted. Council's documentation allows waste to be compacted. <i>'Static compaction units should be considered for larger units to reduce the number of bins required. Typically the compaction ratio is set at 2:1...'</i> Council's fact sheet indicates that compaction should only be considered if collection is weekly. However, the Town Centre development is not like other

Comment	Response
	developments in Liverpool and due to the scale of the development twice weekly collection is a suitable and reasonable approach that will reduce the number of bins required as well as making the collection quicker and safer for collection vehicle operators.
The WMP has a requirement to have onsite collection from the loading dock which means it must be designed in accordance with all the specifications within the Waste Management Services for RFBs and MUDs fact sheet i.e. appropriate height and weight loading etc.	The loading dock will be designed in accordance with all the specifications in the Waste Management Services for RFBs and MUDs fact sheet, including appropriate height and weight loading.

2.16 Traffic Management

A response to the Traffic Engineer comment is provided below.

Table 6 Response to Traffic Engineer comments

Comment	Response
Revised traffic generation potential using RMS trip generation rate (or clarification on the use of other traffic generation rates) and including hotel development, shall be provided for assessment.	As there are a number of ways to interpret the inputs and information requested Frasers will approach the traffic engineer directly to provide a response to their query directly.
A revised assess arrangement and impact assessment of the proposed left in/left out access(s) arrangement on the surrounding road network, with required intersection treatments at the following intersections shall be provided: - Soldiers Parade and Greenway intersection - Bernera Road and Greenway intersection - Bernera Road/Henderson Road intersection	
An electronic copy of SIDRA models of the above intersections is to be submitted to Council for review.	
An indicative design plan for the proposed access off Soldiers Parade showing future provision of 4 traffic lanes (3.2 m inner lane and 3.5 m kerbside lane) with a central median.	

3.0 Response to Sydney Western City Planning Panel

3.1 Street Activation

1. Council Comment

- ***The SWCPP have raised concerns that the proposal does not provide sufficient activation of streets throughout the entirety of the town centre core east. Of particular concern is the activation of Soldiers Parade south of the Eat Street and north of Greenway.***
- ***It is advised that the applicant amend the proposed development to fully activate Soldiers Parade***

Refer to previous responses and Section 2.1(3).

2. Council Comment

- ***Also of particular concern is the activation of Henderson Road facing the train station and whether sufficient consideration has been given to promoting the activation of this space, as opposed to funnelling traffic from the train station to Main Street and Soldiers Parade.***
- ***and investigate options for further activating Henderson Road and providing sufficient site links.***

The streets and laneways of Town Centre East are generally consistent with the Concept Plan as established by the Public Domain Plan and Design Guidelines and has been designed to integrate with the remaining stages of the Town Centre, west of Main Street.

For the Town Centre to be successful, it is critical Main Street is well activated. This was a key requirement of the bid from Urban Growth and is reflected in the masterplan principles that underpin the Concept Plan. The extract of the design principles that underpinned the Masterplan for the Town Centre is shown at **Figure 49**.

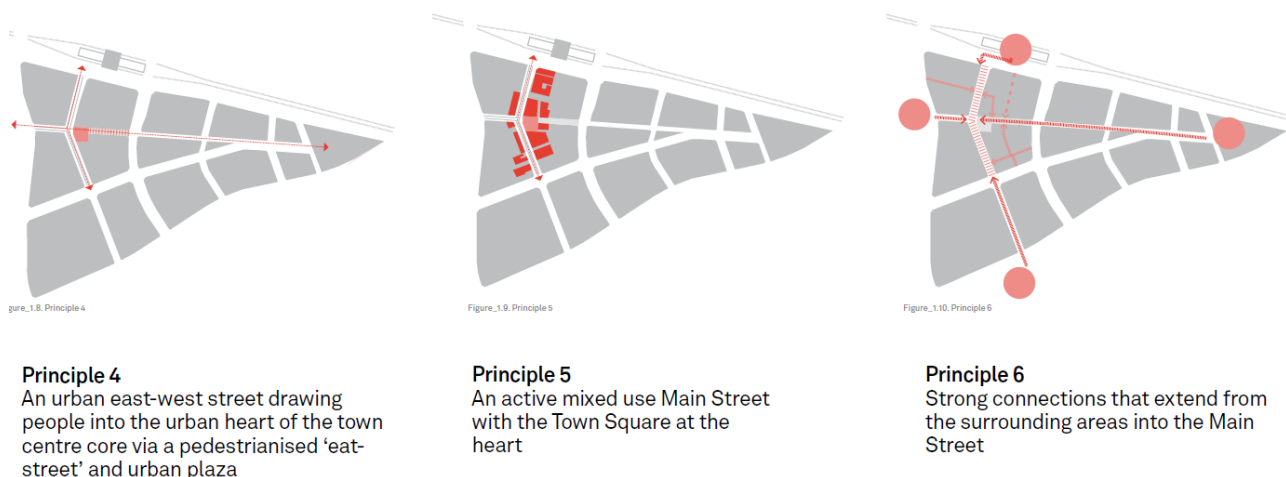


Figure 49 Concept Plan Design Principles

Source: Urban Design Report (Hassell)

As part of the Roads and Infrastructure DA (DA1260/2016) under assessment by Council the existing Henderson Road pedestrian crossing is proposed to be relocated west to allow pedestrians to cross directly from the railway station to the Henderson Road frontage (**Figure 50**). Essentially, all pedestrian traffic from the station will arrive at the Town Centre at Henderson Road, making Henderson Road the most activated frontage for pedestrian arrivals in the Town Centre.

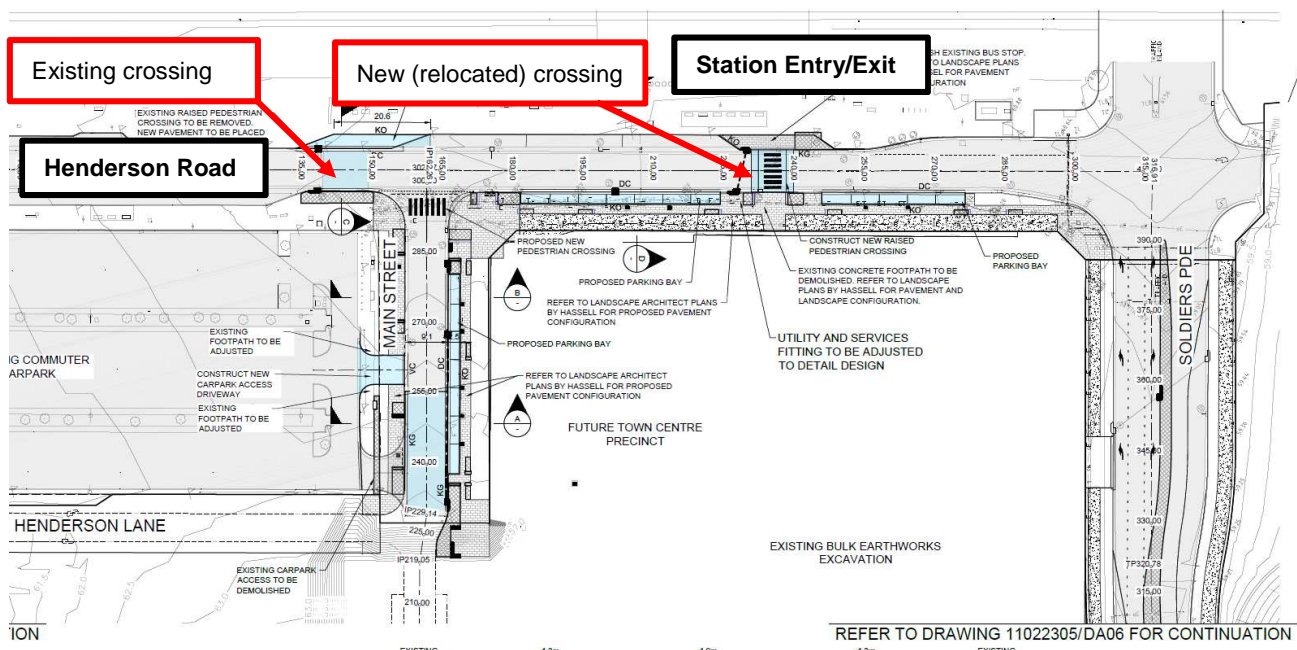


Figure 50 Henderson Road treatment and pedestrian crossing arrangements

Source: JWP (DA1260/2016)

An additional entry point to the centre from Henderson Road would have the effect of funneling traffic from the station into the retail centre – at the expense of Main Street, which is an unacceptable outcome for Frasers and the bid requirements of Urban Growth. Further, funneling pedestrians into the retail centre would also take foot traffic away from the retailers on Henderson Road that do not front any link into the retail area.

The Henderson Road frontage is a well activated space that across 122 linear metres features almost entirely active uses that includes:

- nine retail/business premises tenancies;
- one food and drink premises;
- a child care lobby;
- residential lobby of Building B10; and
- residential terraces of Building B13.

Approximately 5.2 linear metres accounts for inactive uses being for three fire stair exits from the floors above. This accounts for 4% of the Henderson Road frontage, meaning 96% of the frontage is dedicated to active uses.

The first floor is occupied by the child care centre that will further activate the façade. The facade has been architecturally treated to announce and celebrate the Town Centre when viewed from the railway station. The façade treatment and materials ensure the Henderson Road frontage will achieve an appropriate sense of arrival and activation. An artist's render demonstrating the high quality active frontage achieved at Henderson Road is shown at **Figure 51** and **Figure 52** below.

Main Street is to be the heart and primary north-south pedestrian route of the Town Centre and it is important to consider the future Stages 2 and 3 that will complete the retail and civil function of Main Street when considering activation of the Town Centre overall. Main Street will run through the centre of Edmondson Park with pedestrians travelling east and west, accessing the many parts the Town Centre. Accordingly the proposed layout supports activation of the streets and laneways of the Town Centre more broadly than if an additional site link in to Town Centre East would achieve.



Figure 51 Henderson Road active frontage (view from Railway Station)
Source: HDR



Figure 52 Henderson Road active frontage (elevated view)
Source: HDR

3.2 Town Centre Creation

1. Council Comment

- *The SWCPP have raised concern that the proposal may be susceptible to becoming a 'shopping centre' as opposed to its intended function as a town centre. The panel has raised concern that a 'sense of place' will not be created at the site, especially as the design appears to be centred on large commercial tenants (anchor tenancies), which may detract from social interaction within the town centre.*
- *Accordingly, the applicant is advised to adequately demonstrate how the street/pedestrian network and commercial layout proposed will provide dynamic social interaction within the town centre.*

Figure 53 shows the extent of internal versus internal (covered) spaces. It shows that the Town Centre is dominated by external facing environment that features awnings to provide protection from the elements to provide a comfortable environment to spend time. This is at odds with a traditional shopping centre that would typically be dominated by an enclosed air conditioned space.

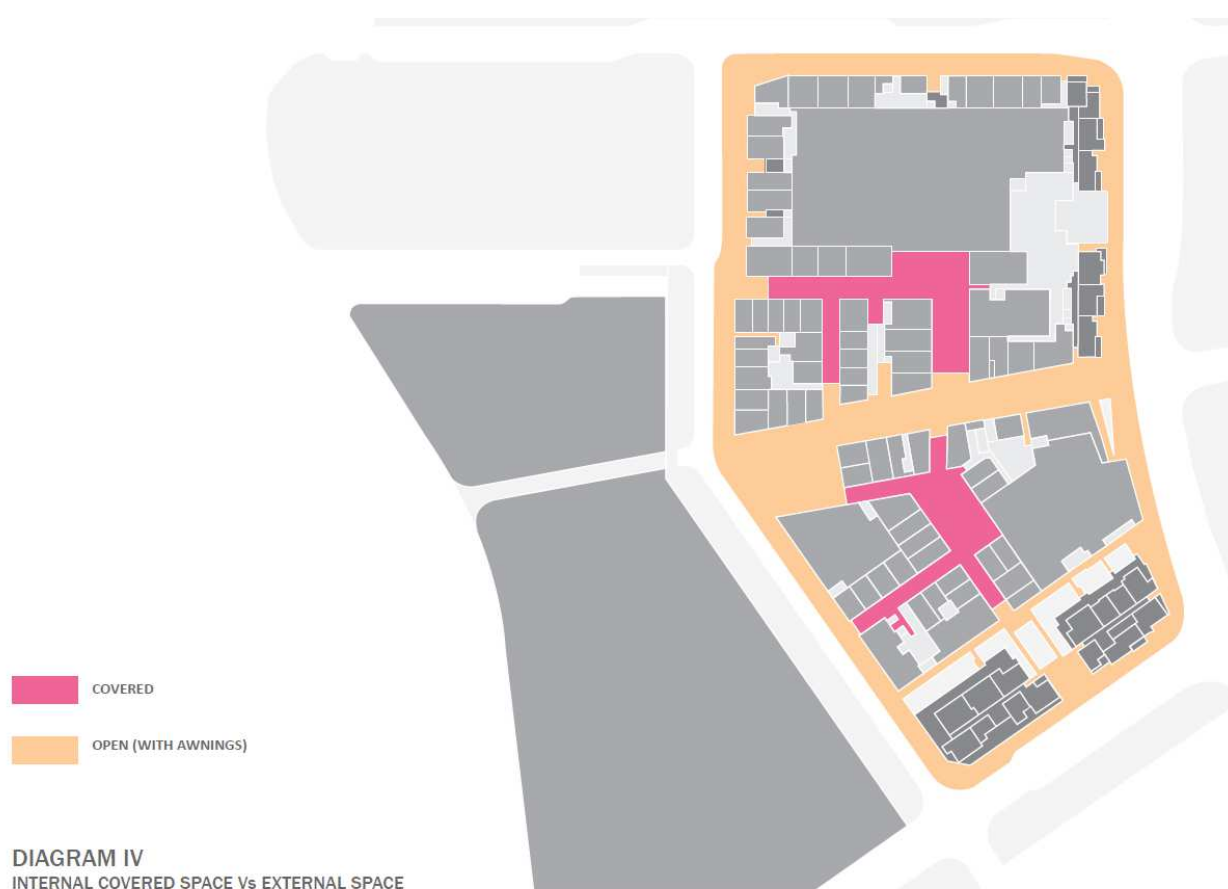


Figure 53 Internal versus external spaces

Source: HDR

Figure 54 shows the diversity of places and spaces available in Town Centre East to demonstrate that within the public domain and within the NE and SE quadrants there is a high variety of spaces. The landscaping strategies, play strategies and mix of fine grain and large retail all add layers to the sense of place achieved in the Town Centre. This is further discussed elsewhere in this response.

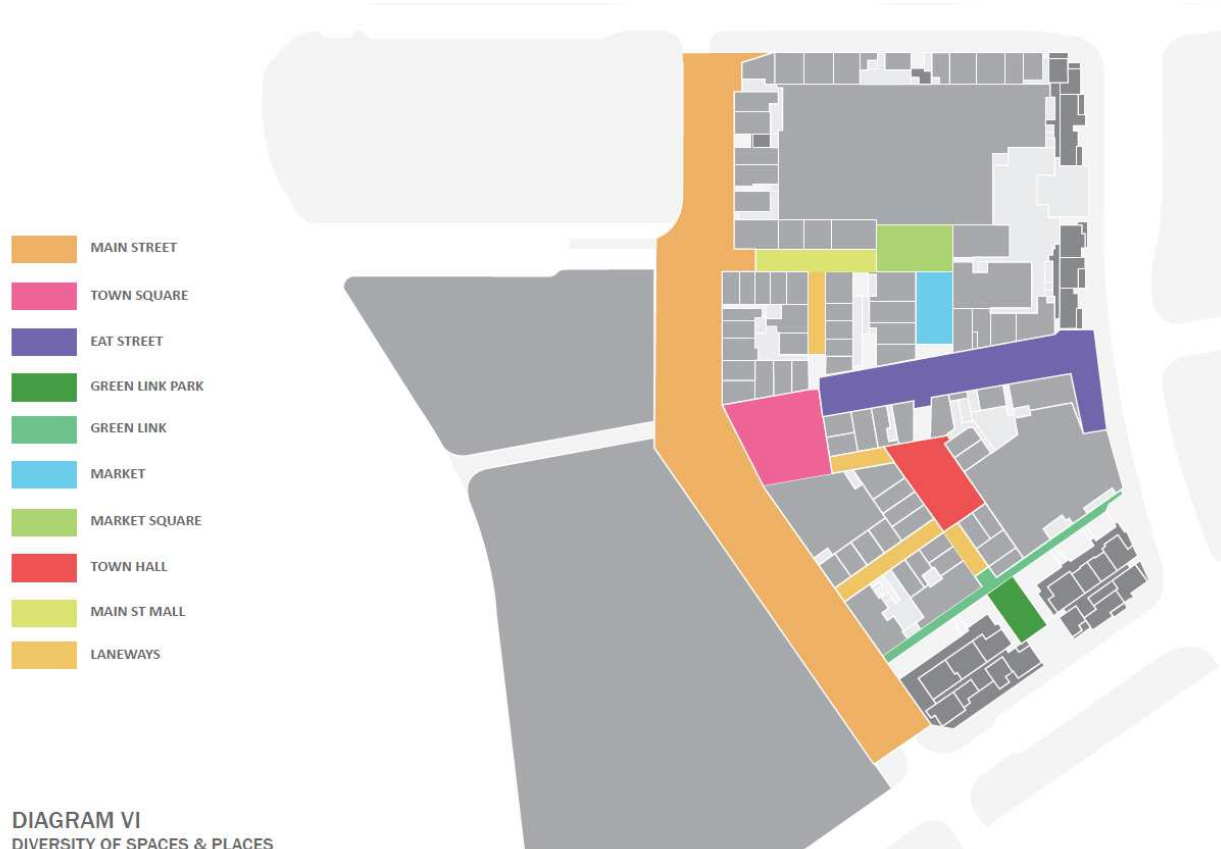


Figure 54 Diversity of spaces and places

Source: HDR

It is important to consider the Town Centre as a whole, inclusive of future Stages 2 and 3 as envisioned by the Concept Plan. Edmondson Park will be a thriving and authentic Town Centre with a variety of programmed spaces around pedestrian focused streets.

Whilst modern shopping and commercial realities necessitate the provision of anchor tenants within successful shopping precincts, Frasers do not accept the suggestion that the Town Centre is centered on large commercial tenancies at the expense of social interaction within the Town Centre.

Edmondson Park is proposed to have a 4,000m² full line supermarket and 3,600m² cinema over 24,000m² equating to approximately 31.5% of anchor tenants. The remainder of tenancies feature a significant proportion of tenants that are small specialty retail and food and drink tenancies made up of largely non national or international brands, far in excess of other sub-regional shopping centres in the sub-catchment, as follows:

- Casula Mall – greater than 50% major tenants; and
- Carne Hills – 76% major tenants.

Beyond the retail component, the town centre features high quality public domain and amenity for users. Town Square and Eat Street are designed as places for people to dwell, spend time and ensure social interaction. Eat Street features play equipment whilst Town Square features water play and significant quantum of outdoor seating and planting creating a thriving community focused heart. Consistent with the Public Domain Plan the streetscape is provided with generous pedestrian spaces appropriate for a walkable town centre. The Town Centre is provided with a variety of open spaces including parks, pocket parks and pedestrian spaces like Eat Street and Town Square where there is opportunity to stop and enjoy the atmosphere and facilities of these spaces. In addition the town centre itself features built elements, landscaping and public art that enhance the community feel of the town centre, ensuring it is a place that people want to visit and dwell time.

2. Council Comment

- ***At this stage, the reduced opportunity for site links from the train station into the town centre is considered to reduce the activation of Henderson Road and the creation of a 'town centre' or a sense of 'place'.***
- ***The panel did raise some concern for the connection between Eat Street and the adjoining parkland across Soldiers Parade due to the inclusion of a staircase and change in level between these spaces. It is advised that the applicant investigate connectivity and accessibility into Eat Street to demonstrate that this is the best design outcome for this space.***

As outlined above, Henderson Road will be the main arrival point for all pedestrians accessing the Town Centre from the station, ensuring Henderson Road is highly activated. An additional site link into the centre at Henderson Road will have the effect of funneling pedestrians into the retail centre and will have the effect of stifling Main Street of activity undermining the Panel's desire to create a true town centre. It is critical that Main Street be a successful and active space.

Notwithstanding, Henderson Road is a well activated space that features almost exclusively active uses 96% of the length of the façade as outlined previously.

These investigations (**Figure 36**) include designing Eat Street to be:

- A street open to traffic (Option 1)
- A pedestrian street capable of conversion for vehicle traffic (Option 2); and
- A pedestrian only street closed to traffic (Option 3).

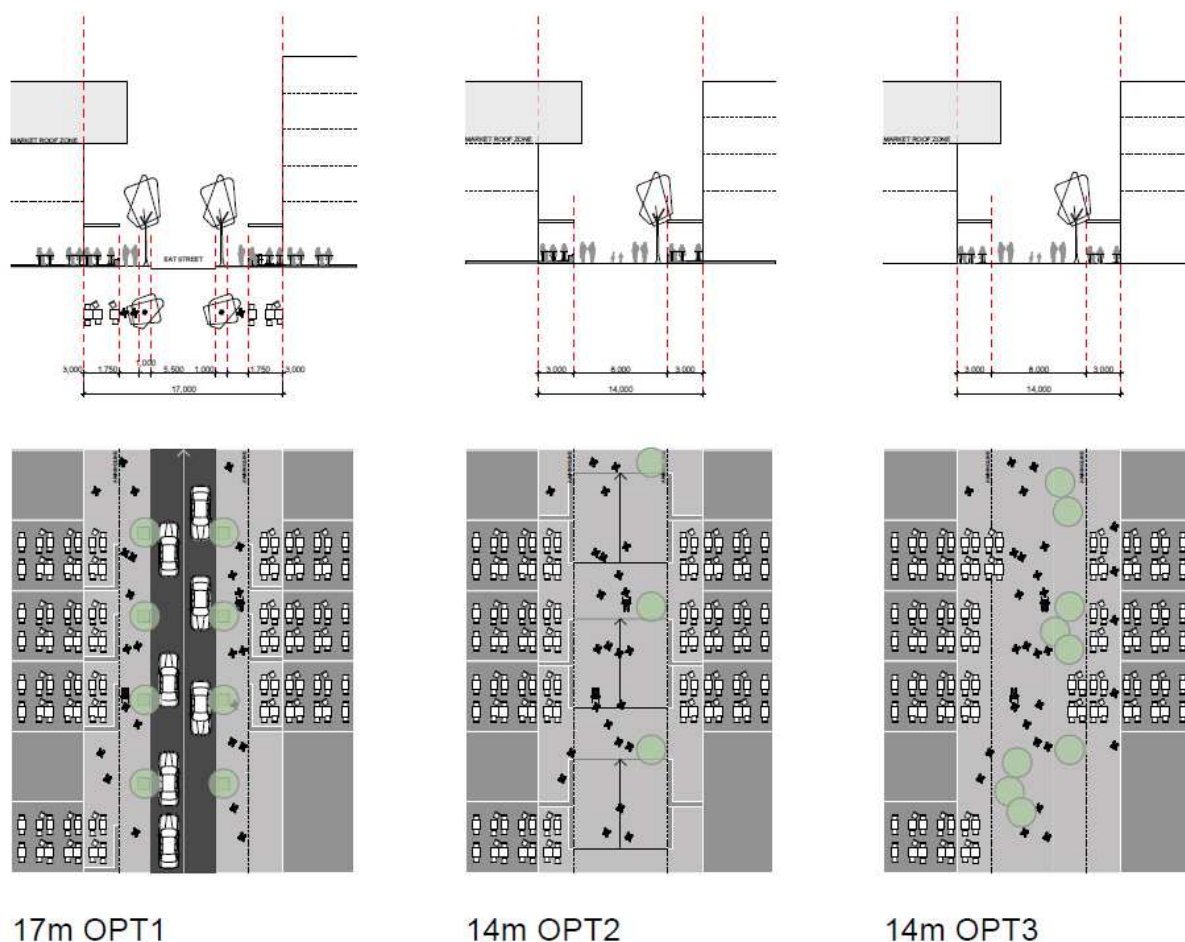


Figure 55 Eat Street Options analysis

Source: HDR

Option 1 and 2 allowed for Eat Street to be accessible by vehicles either permanently or as necessary and include multiple grade transitions to connect Soldiers Parade with Main Street. The analysis found Option 1 and 2 resulted in poorer outcome for the space as:

- Grade changes would require dining areas to be terraced, compromising the openness of these spaces;
- Ramps would require handrails and tactiles throughout Eat Street, introducing barriers to pedestrians;
- Tenancies would require ramps and steps complicating the streetscape; and
- Level changes compromised continuity within the Town Centre and would have ongoing impact to 'through' tenancies.

Option 3 is the preferred option and closed Eat Street to traffic, opening the space exclusively to pedestrians. The only grade transition is provided by stairs and ramp at the intersection of Soldiers Parade. The benefits to this arrangement include:

- All hazards are minimised with no need to provide terracing, ramps, handrail or stairs throughout Eat Street;
- More clear lines of sight to Town Park and Town Square;
- A level Eat Street provides continuity with the levels of the rest of the Town Centre;
- A level Eat Street allows for flexible tenancies on the same level and 'through' tenancies;
- Allows for more flexible outdoor dining arrangements enhancing the appeal of Eat Street as an alfresco precinct;
- Allows greater opportunities for soft landscaping;
- Centralising the grade change to the east frees up space within Eat Street that would otherwise be used for ramp and grade change infrastructure for more flexible arrangements of play equipment and landscaping opportunities.

The Public Domain Plan approved by the Concept Plan identifies Eat Street as a "pedestrianised street lined with outdoor dining and features a central activation zone with integrated play and seating". To successfully achieve the alfresco precinct envisioned by the Concept Plan Eat Street needs to be level. The significant grade difference between Main Street and Soldiers Parade makes it impossible to provide Eat Street as a level space that connects to Town Square without accounting for the grade change as outlined in the options analysis above.

The preferred option was to separate Soldiers Parade from Eat Street by the incorporation of a grand stair that has many advantages, including:

- Heralds the arrival of the Town Centre with a grand gesture that leads pedestrians up and into the Eat Street pedestrian precinct;
- Provides an amphitheatre like grand stairs that will become a Town Centre focal point/meeting point;
- Resolves pedestrian/vehicle safety concerns by separating the pedestrian space from the busy Soldiers Parade;
- Provides an elevated plane to Soldiers Parade to enhance the pedestrian environment;
- Provides an informal seating platform for users to relax and appreciate views toward Town Park opposite; and
- Incorporates a ramp ensuring equal access for all users.

The Eat Street connection to Soldiers Parade is fully compliant with relevant BCA and DDA legislation. An assessment of accessibility is provided by MGAC at **Appendix Q** of the SEE.

3.3 Lane Activation

The SWCPP have raised concern for the lack of treatment of the public laneway to the residential flat buildings known as B06 and B07 and at the rear of the commercial space in the south east quadrant. The applicant is recommended to amend the design of this public laneway to introduce activation from the commercial areas and include a green wall/ public art.

Refer to Section 2.6(1).

3.4 Overshadowing

1. Council Comment

- *The SWCPP have raised concern for potential overshadowing impacts associated with the proposal. The panel have noted that there appears to be unreasonable overshadowing of the communal open spaces (COS) and the childcare centre at the podium level during mid-winter. It is recommended that evidence is provided by the applicant that adequately demonstrates that COS is not unreasonably overshadowed in accordance with the provisions of the Apartment Design Guide (ADG)*
- *and that the proposed childcare centre has adequate access to daylight for the building and outdoor play areas during mid-winter.*

3.4.1 Child Care Centre (Mezzanine Level)

The child care centre at the Mezzanine Level is north facing with openings (glazing and perforated screen) along the length of the façade (Figure 56). In addition there is a sky light opening above the eastern outdoor area on Mezzanine (Figure 56 and Figure 57). During mid-winter the child care centre will receive uninterrupted daylight from the northern sun along the length of Henderson Road as there is no intervening development to the north. HDR have provided a sectional and 3D view of the child care centre and sunlight penetration at Appendix B and Figure 58.

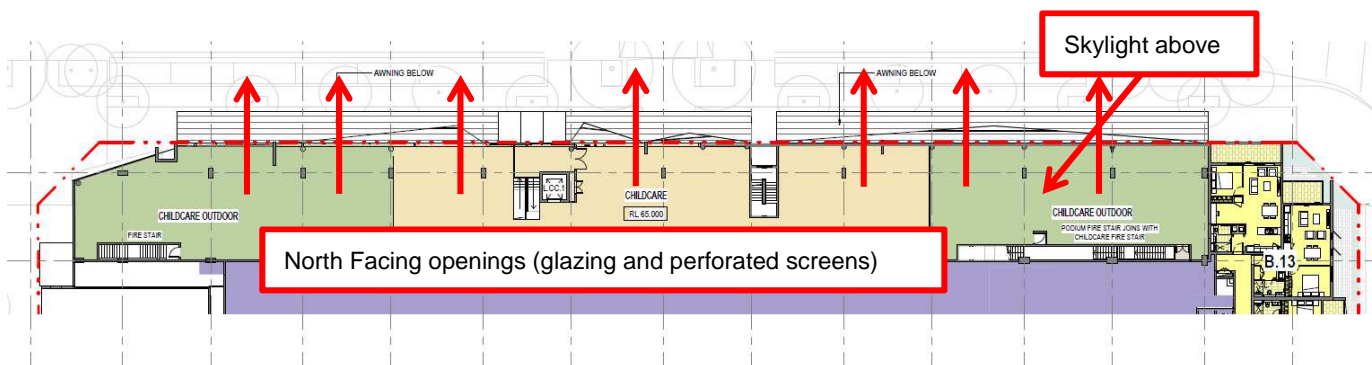


Figure 56 Child Care (Mezzanine Level) openings to north

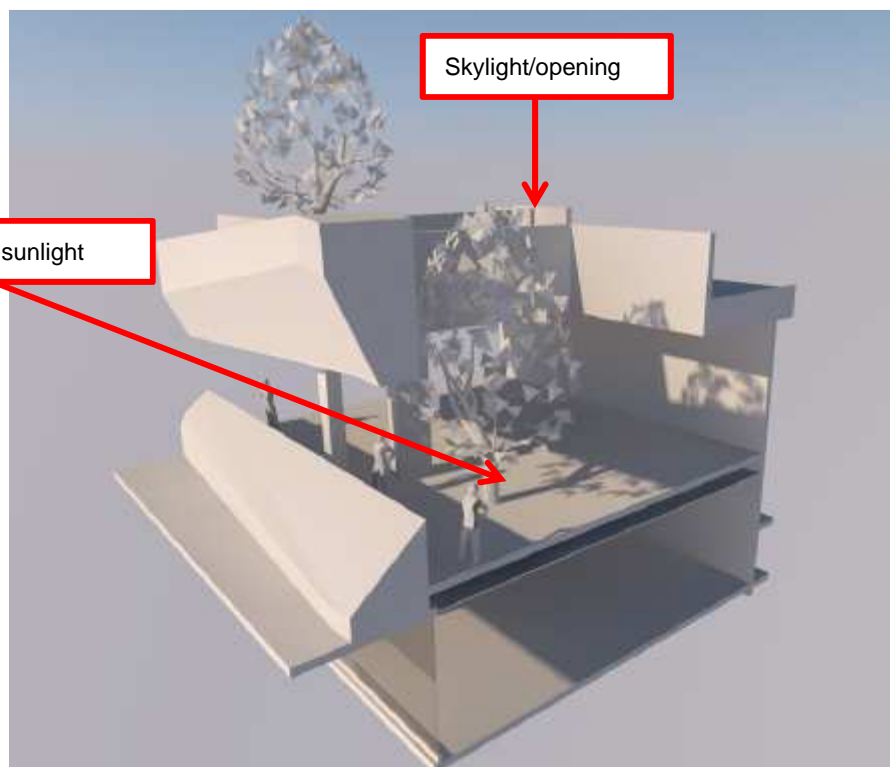


Figure 57 3D min-winter sun penetration analysis of Child Care centre - eastern outdoor area (Mezzanine Level)

Source: HDR

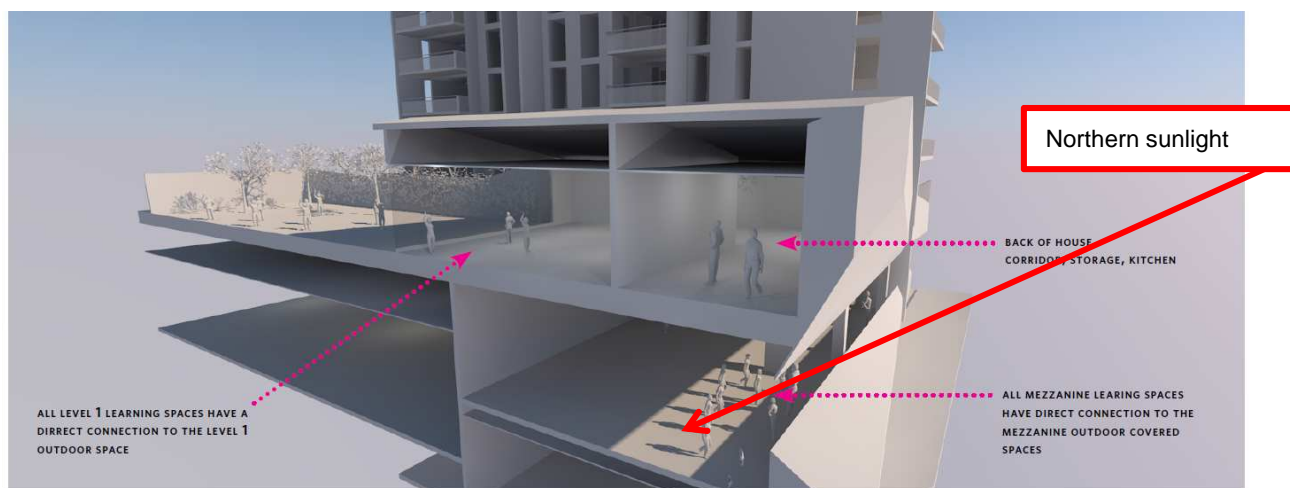


Figure 58 3D mid-winter sun penetration of Child Care Centre (Mezzanine Level)

Source: HDR

3.4.2 Child Care Centre (Level 1) Indoor space

The indoor child care centre at Level 2 has been designed to accommodate back of house facilities including corridor, storage and kitchen facilities in the northern portion of Level 2 where the solid wall forms the Henderson Road architectural façade (refer to **Figure 59** below). The southern portion of Level 2 will accommodate the learning spaces that front directly on to an approximate 17m opening to the outdoor area to the south. The large opening will ensure that this space receives adequate natural light as illustrated by the 3D diagram prepared by HDR at **Appendix B** and shown at **Figure 60**).

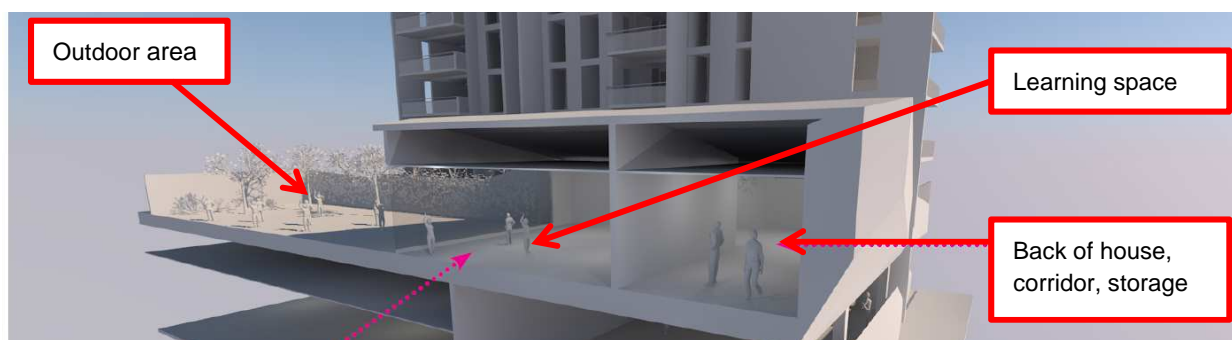


Figure 59 3D section of the Child Care Centre (Level 1)



Figure 60 3D view from Child Care centre learning spaces (Level 2 – looking south)

3.4.3 Child Care Centre (Level 2) Outdoor Space

The Draft Child Care Centre Guidelines recommend outdoor spaces of Child Care Centres:

- *provide solar access throughout the year to at least 30 per cent of the ground area*
- *provide shade in the form of trees or physical shade structures that provide protection from ultraviolet radiation to at least 30 per cent of the outdoor play area*
- *shade structures should be evenly distributed over different activity spaces and not just consolidated over one area.*
- *It is recommended that no more than 60 per cent of outdoor space is covered.*

The shadow diagrams provided by HDR at DA 07 of the Architectural Plans (Appendix A of the SEE and provided at **Figure 61 - Figure 64** that show that during mid-winter the outdoor play area progressively receives direct sunlight between 9.00am and 12.00pm. The diagrams show that the outdoor play area is provided with solar access to greater than 30 percent of the ground area at mid-winter, consistent with the Draft Child Care Centre Guidelines.

Whilst this DA does not seek approval for the fit-out of the centre the outdoor space is capable of including outdoor shading structures consistent with guideline recommendations above and will be a space that will protect children and staff from ultraviolet radiation, making the space highly useable. The shadow diagrams demonstrate the outdoor area receives adequate access to daylight during mid-winter and subject to the fit-out DA for the Child Care Centre will incorporate suitable sunshade structures.

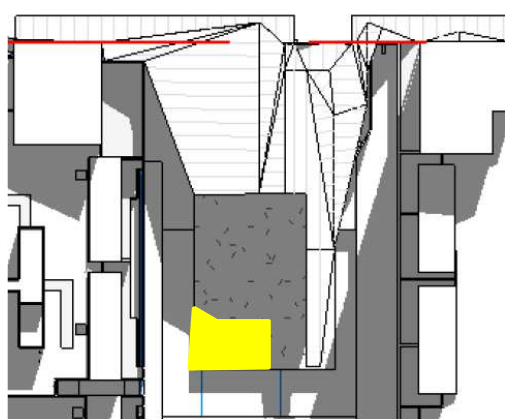


Figure 61 Mid-Winter 9.00am



Figure 62 Mid-Winter 10.00am

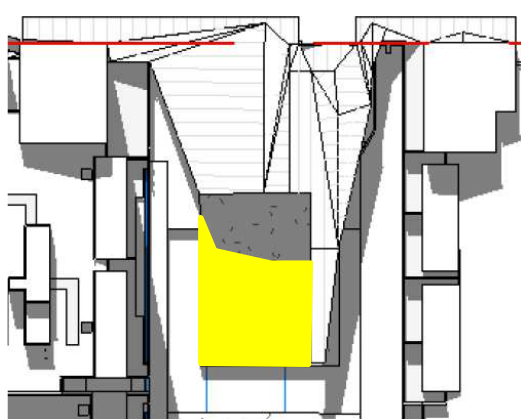


Figure 63 Mid-Winter 11.00am

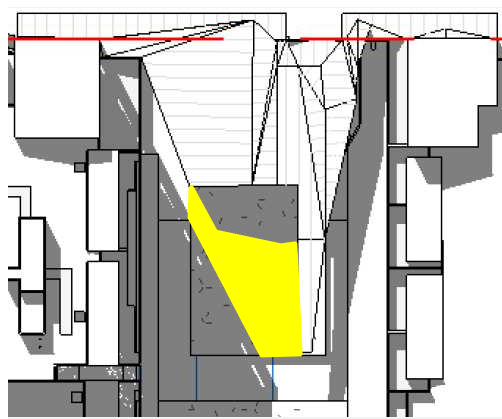


Figure 64 Mid-Winter 12.00pm

3.4.4 Communal Outdoor Open Space

Refer to Section 2.1.4(1).

2. Council Comment

- ***The panel also raised concerns that buildings in the south eastern quadrant may unreasonably overshadow development in Residential Precinct 1 located across Greenway. Accordingly, the applicant is advised to adequately demonstrate that the dwellings within Residential Precinct 1 will not be unreasonably overshadowed by the proposal.***

The Department considered potential overshadowing impacts from the Town Centre on surrounding land uses as part of the Concept Plan (refer to page 20 of the Departments Environmental Assessment Report). The Department found the Town Centre would not create unacceptable overshadowing impacts on residential land or public open space outside the Town Centre.

Built form guidelines for the Residential Precincts are established by the Design Guidelines that require 70% of multi-dwelling and attached dwellings achieve at least two hours' solar access between 9am and 3pm mid-winter. All development applications in the Residential Precinct will be required to demonstrate that development meets the solar access requirements of the Design Guidelines. The Department found these requirements provide suitable controls for managing overshadowing within the Residential Precincts.

3.5 ADG

1. Council Comment

- ***The SWCPP have raised concern regarding the proposed development's compliance with the ADG, especially in relation to COS provision. Accordingly, it is advised that the applicant redesign the proposal to achieve full compliance with the COS requirements of the ADG.***

Refer to Section 2.4(1).

2. Council Comment

- ***It is also advised that the applicant amend the proposed residential flat buildings to achieve full compliance with the maximum number of units off one circulation core***

Refer to Section 2.4(4).

3.6 Deep Soil Zone

The SWCPP have raised concern that the exclusion of the deep soil zone within the town centre core is a missed opportunity, especially considering to the local climate conditions. The applicant is recommended to investigate the provision of deep soil zone within the town centre core.

The proposal is consistent with the Concept Plan which always intended the Town Centre to have 100 percent site coverage as reflected by the illustrative design scheme which proposed two basement car parking levels below the entire Town Centre. Basement excavation of the entire volume of the Town Centre never included provision of deep soil. Council considered and approved excavation of the basement of the Town Centre under DA628/2016 and DA925/2016.

Refer to Section 2.4(2) and 2.1(4) for further discussion.

3.7 John Edmondson Memorial

The SWCPP have raised concern regarding the omission of a John Edmondson Memorial work within the development site. Accordingly, it is recommended that the applicant investigate the inclusion of a John Edmondson memorial within the town centre core east.

As stated in the Public Art Plan at **Appendix X** of the SEE:

"Frasers Property Australia are also committed to the respectful commemoration of the life, heroic actions and tragic death of John Edmondson VC and to also acknowledge the sacrifices of the Edmondson family, whose

lives were shattered by the loss of their only son. Frasers Property Australia have made provision for an artist to explore the life and legacy of John Edmondson and his family. The artist will research the archive of material donated by Maude Edmondson, mother of John, to the Australian War Memorial. This material includes the scrapbooks and diary kept by Maude Edmondson whilst her son was away at war. The outcome of this research will inform the commissioning of a permanent memorial to The Edmondson Family at a prominent site within Edmondson Park."

Further advice has been prepared by Queen and Crawford (**Appendix H**) who confirm the location of the memorial will be informed by the artist in collaboration with Council, the design team and Frasers. The preferred location of the memorial is in a parkland environment such as Town Park or Town Centre Reserve to ensure the memorial is located on public land. The parkland environment is considered conducive to quiet, dignified reflection and will enable activity (educational and commemorative) around the memorial away from the distractions of a busy Town Centre. It is noted that the requirement to provide the Memorial is likely to form part of the VPA, which will ensure its delivery to Council's requirements.

As outlined by the Public Art Plan the activities and outcomes of the public art programme will be guided by a steering group that will include the Liverpool City Council Public Arts Officer.

3.8 Car parking conflicts

The SWCPP have raised concern for potential conflict between retail parking and residential parking uses within basement level 2. Accordingly, the applicant is advised to provide sufficient details which demonstrate how potential conflicts between retail parking and residential parking users (eg. safety, security, CPTED, etc) will be appropriately managed and separated.

Refer to Section 2.9.

3.9 Waste Location

The SWCPP has raised concerns for the suitability of the location of the waste services and loading docks on Basement Level 2 with regards to vehicle access and manoeuvrability. Accordingly, the applicant is advised to relocate the basement 2 waste services and loading docks to basement level 1 or ground level.

The proposed loading dock and waste services area provides a single consolidated location for loading/deliveries and waste to be stored and collected from across Town Centre East. This efficient arrangement avoids unsightly separate waste collection facilities and vehicle collection points that would compromise provision of active streetscapes in the Town Centre. The proposed waste services and loading dock is therefore ideally located to screen these uses from public view.

Council requests the loading dock be raised closer to Ground Level, either to Basement Level 1 or Ground. Due to the change in site levels across the site the location of the loading dock and waste services at 'Basement Level 2' is actually one level below Ground and should be thought of as being equivalent to Basement Level 1 for the purposes of this comment, effectively providing the arrangement requested by Councils.

Notwithstanding, should the loading dock/waste services be relocated up to 'Basement Level 1' (which is level with ground at Soldiers Parade) the loading dock would have a significant impact on activation in this part of the Town Centre, particularly Soldiers Parade and Henderson Road. This arrangement would be a poorer outcome for the Town Centre.

Assessment of vehicle access and manoeuvrability within the Loading Dock has been undertaken by Ason Group as part of design development. The loading dock has been designed to accommodate a wide range of vehicles up to an articulate vehicle (semi-trailer) up to 19 metres in length. A swept path analysis is provided at Appendix G of the SEE which demonstrates notwithstanding minor design changes to be accommodated in detailed design, the loading dock is suitable for access and manoeuvrability.

3.10 Compliance with Plans and Policies

The SWCPP has raised concerns as to the proposed developments compliance with the different plans and policies associated with the development of the site. Accordingly, it is advised that the applicant provide sufficient evidence demonstrating full compliance with the following:

- a) State Environmental Planning Policy (State Significant Precincts) 2005;*
- b) Modification to Edmondson Park South Concept Plan MOD 4 – D479/17;*
- c) State Environmental Planning Policy – Design Quality of Residential Apartment Development;*
- d) Apartment Design Guide; and*
- e) Edmondson Park Frasers Town Centre Design Guidelines*

State Environmental Planning Policy (State Significant Precincts) 2005

Assessment of the State Significant Precincts SEPP is provided at **Section 5.1** and **Table 7** of the SEE.

Modification to Edmondson Park South Concept Plan MOD 4

Assessment of the Concept Plan is provided at **Section 5.2, 5.21, Table 8** and additional advice as issued to Council dated 17 October 2017.

State Environmental Planning Policy – Design Quality of Residential Apartment Development

Assessment of SEPP65 is provided at **Section 5.1, Table 7** of the SEE. Assessment against the design quality principles of SEPP 65 is provided by project architects HDR at **Appendix B** of the SEE.

Apartment Design Guide

An assessment of the proposal's consistency with the Objectives and Design Criteria in the ADG is provided at **Section 5.8** and **Table 10** of the SEE. An assessment of Section 3 and 4 of the ADG is provided by project Architects HDR at **Appendix B** of the SEE.

Edmondson Park Frasers Town Centre Design Guidelines

Assessment of the Design Guidelines is provided at **Section 5.5** and **Appendix BB** of the SEE. It is noted that changes to the Design Guidelines as required by the Concept Plan amendment have no effect to the Design Guidelines assessment provided for the Town Centre East DA. Accordingly, the assessment of the Design Guidelines at **Section 5.5** and **Appendix BB** of the SEE is complete.

3.11 Design Excellence Panel (DEP)

The SWCPP has noted that they will be taking into consideration any comments made by the DEP as a result of their briefing with the applicant. In this regard, it is advised that the applicant adequately address any points made by the DEP when they are made available.

Frasers will respond to comments from the DEP separately.

3.12 Council Assessment

The SWCPP requested that Council ensure the following matters are adequately addressed before determination of the DA:

- a) Availability of all critical services for the site and the development are confirmed; and*
- b) Details of the Special Infrastructure Contribution (SIC) Levy are confirmed.*

a) Services

Confirmation has been obtained from relevant utility infrastructure suppliers that the site is capable of being adequately serviced (refer to **Section 4.21 and Appendix Y, Z and AA** of the SEE). It is further noted that provision of services to and around the Town Centre is addressed by the Roads and Infrastructure DA currently under assessment by Council (DA1260/2016).

b) Special Infrastructure Contribution Levy

Following approval of the DA the Department of Planning can provide a SIC exemption letter. This cannot be provided in advance of any approval. An exemption letter that applies to DA621/2016 is attached at **Appendix L** that confirms SIC clearance for the site for that DA.

It is requested that any condition related to the payment of a SIC Levy be worded to enable Frasers to obtain and provide the SIC clearance letter to confirm there is no SIC payable for this site, following Determination.