

31 May 2024

Open Space provision in Edmondson Park

1 Purpose

The purpose of this memorandum is to provide an overview of open space issues at Edmondson Park to assist Landcom in responding to a request for additional information (**RFI**) issued by Liverpool City Council on 7 March 2023 for DA-82/2023.

A key objective of this memorandum is to demonstrate that Landcom is providing sufficient active and passive open space opportunities in line with the underpinning applicable strategic planning framework.

2 Background

Contributions Plan

The Liverpool Contributions Plan 2008 Edmondson Park (**Contributions Plan**) was adopted on 17 December 2007 and amended on 5 January 2021.

In respect of open space provision in the vicinity of the subject land, the Contribution Plan identifies the provision of **9.66 ha** of land and works for the purposes of Open Space, with only **3.78 ha** of this within the site as shown in **Table 1** and **Figure 1** below.

Table 1 – Summary of Contribution Plan provision

Ref.	Description	Area (ha) / length (m)	Within the site
OS7	Open Space – Active Area with Children Play Space	5.08 ha	0.04 ha
OS8	Open Space – Active Area	4.58 ha	3.74 ha
Total		9.66 ha	3.78 ha



Figure 1. Location of Contribution Plan items within the site

State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (SEPP)

Since the adoption of the Contributions Plan, there have been changes to the size, location and configuration of open space on the land as a result of the approval of the Concept Plan and rezoning of land. The key takeaways are:

- the location of open space has been shifted south to:
 - Allow the extension of the C1 zoned land from the West of Zouch Road to the East of Zouch Road;
 - Adjoin Campbelltown Road;
 - Be located closer to Mont Street Quinten Oval to the south of Campbelltown Road to provide better accessibility; and
 - Increase the amount of open space that is located on certified biodiversity land.
- increase in overall provision of Open Space from **9.66 ha** to approximately **9.67 ha**.
- configuration/shape adjusted with most of the open space now located on the subject site.

The size and configuration of the open space per the SEPP is shown in **Figure 2** below.

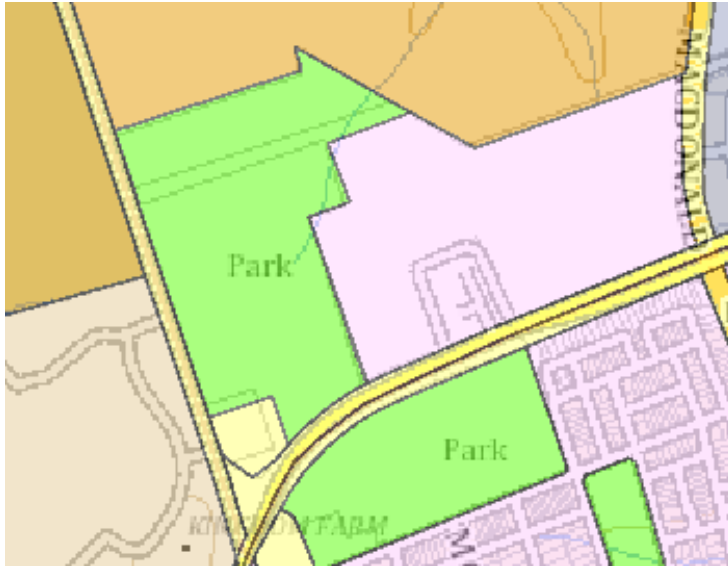


Figure 2. Land zoning map under the SEPP

Concept Plan and Development Control Plan (DCP)

The Open Space Network Concept Plan shown in **Figure 3 and 4** which supports the approved Concept Plan provides public open space for conservation and active recreation purposes within the Landcom site. This is further supported in the Edmondson Park South Development Control Plan 2012 (**DCP**). The overall land area to be provided for the purposes of Open Space is **9.67 ha**.

It is important to note that water cycle management facilities such as raingardens and detention basins are co-located within “conservation area” and “open spaces” areas in the approved Concept Plan and DCP, with the areas of these items included in the overall open space calculations. This approach reflects that these water cycle management facilities contribute towards the overall provision of open space within the precinct as demonstrated in **Figure 5 and 6**.

The total open space area of **9.67 ha** identified in the Concept Plan and DCP is generally consistent with the contributions plan open space area of **9.66 ha**.

Given that the updated land zoning under the SEPP, the DCP and Concept Plan came into force after the adoption of the contributions plan and no corresponding amendment to the contributions plan has been undertaken, the planning provisions contained in these documents form the basis of our open space assessment outlined in this memorandum.



Figure 3. Open Space Network Concept Plan

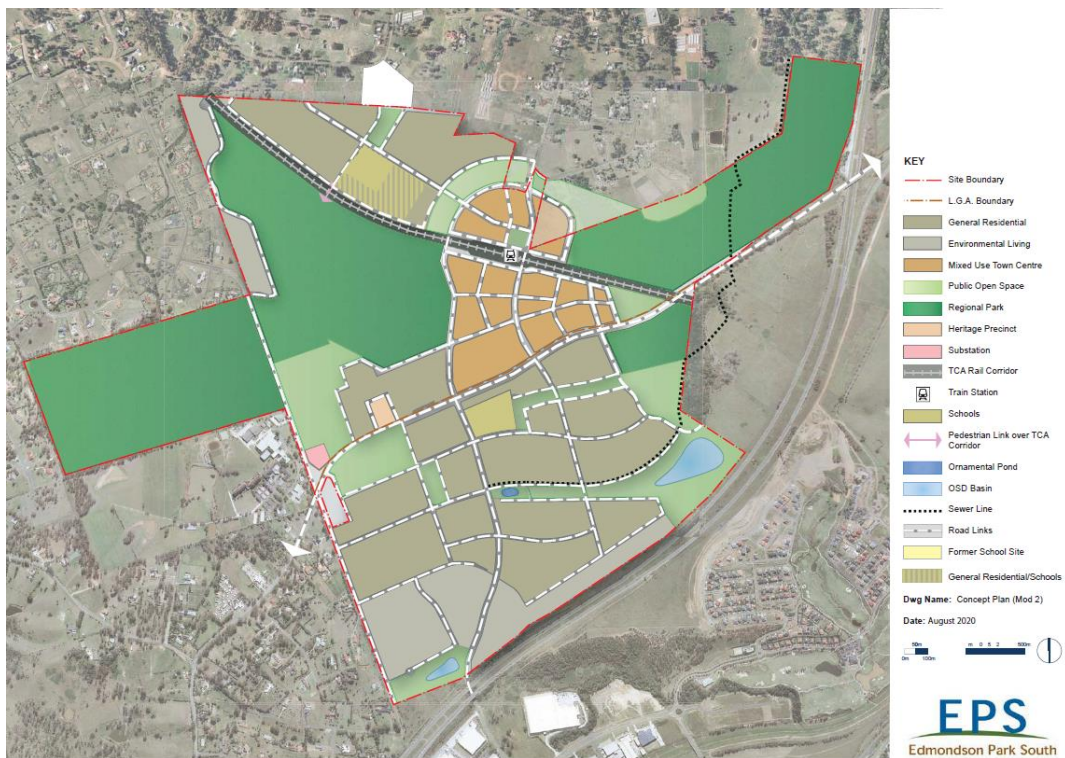


Figure 4. Concept Plan

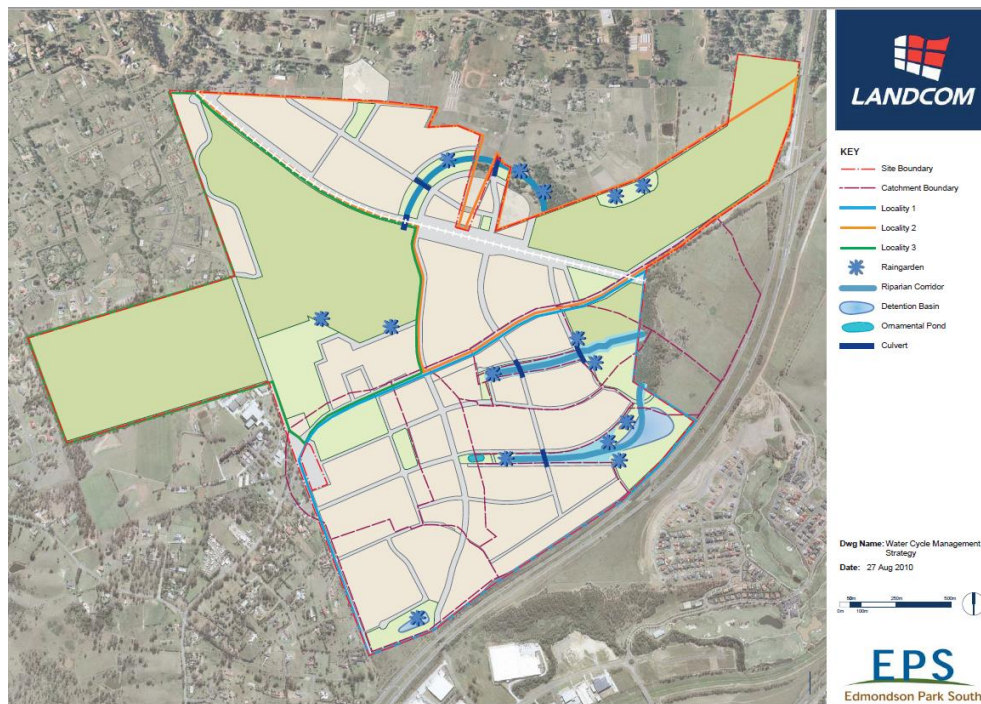


Figure 5. Water Cycle Management Strategy supporting the Concept Plan

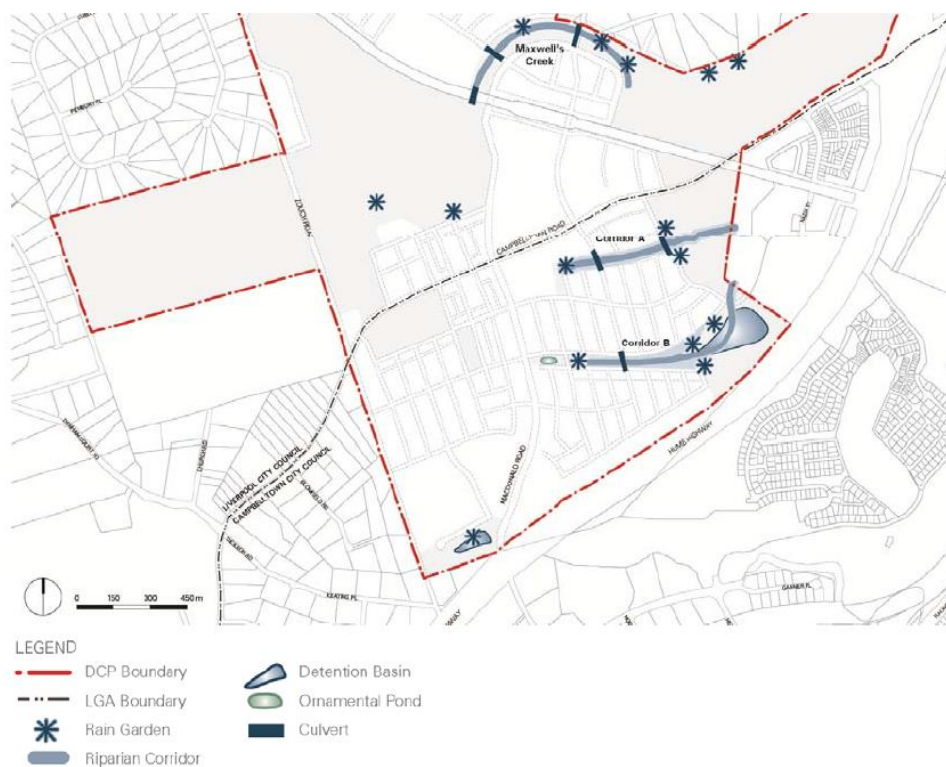


Figure 21 - Riparian and Water Cycle Management Plan

Figure 6. Riparian and Water Cycle Management Plan (Edmondson Park South Development Control Plan 2012)



3 How is Landcom addressing the provision of open space

Landcom is seeking to provide an open space outcome which reflects the quantum of open space envisioned by the Concept Plan, whilst accommodating the need to provide supplementary road access through to Zouch Road. Landcom proposes to achieve this through a combination of open space on RE1 zoned land and other open space land throughout the development. The amount of open space included in the development is analysed below.

The RE1 open space included in the development application is provided as two distinct parcels which are intersected by a road. The southern parcel will include structured active open space in the form of playing fields and the northern parcel, which is non-certified, will include non-structured active and passive open space opportunities.

The east-west road which connects the proposed development to Zouch Road has been incorporated into the development application shown in **Figure 7** following the receipt of advice from Transport for NSW (**TfNSW**) that Campbelltown Road is access denied, and the road connections identified in the Concept Plan cannot be achieved. Vehicular access points to McDonald Road in the east and Zouch Road in the west are necessary to achieve vehicular accessibility outcomes for the proposed development. TfNSW’s advice is provided in **Attachment 1**.

Figure 7 below shows the indicative location and size of the Open Space portions on a subdivision plan, with this information displayed in **Table 2** below.

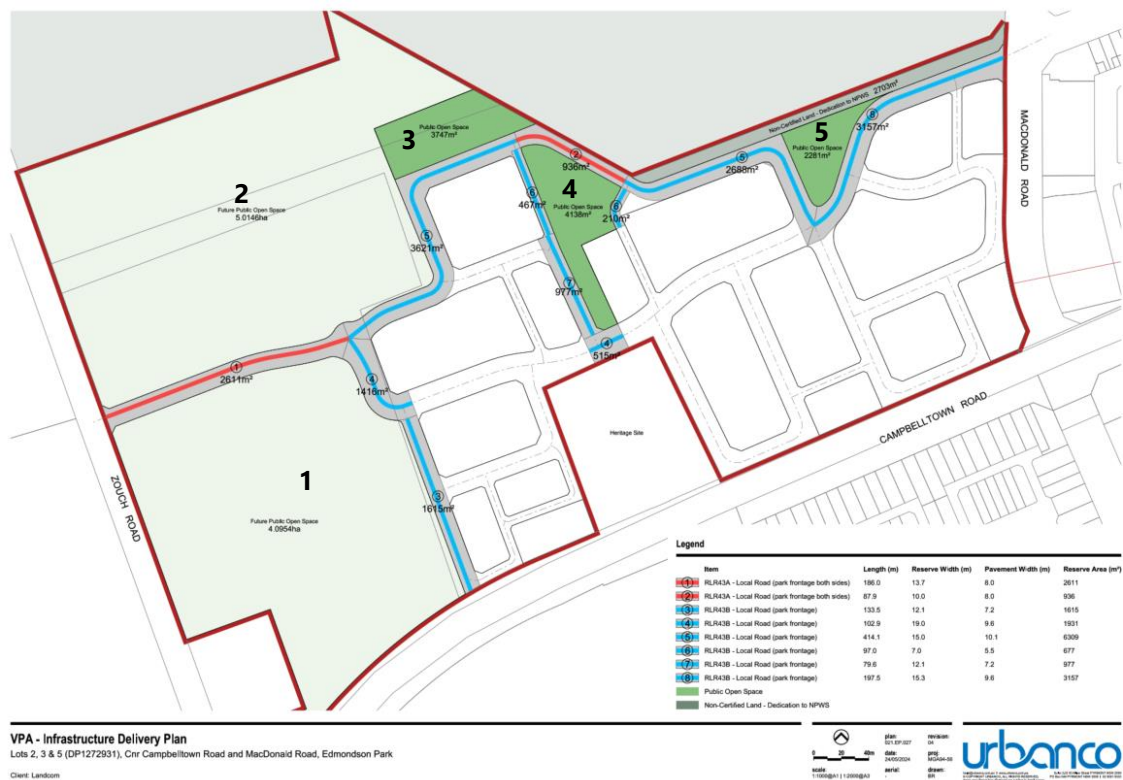


Figure 7. Proposed open space delivery

It is noted that in response to issues raised in Council's RFI, Landcom has amended the subdivision plan by realigning a section of north-south road so that it sits predominantly outside the RE1 zoned land as shown in the figure above to increase the quantum of Open Space.

Table 2. Summary of Open Space proposed by Landcom


Lot ID.	Area	GLN Comment
1	5.0146 ha	Area of active space and proposed sports fields consistent with the intention of the Contribution Plan and proposed to be acquired by Council
2	4.0954 ha*	Non-certified land proposed to be acquired by Council
3	0.3747 ha	The DCP and Concept Plan identify that water cycle management facilities can be considered in the overall calculation of open space. This land currently adjoins Lot 159.
4	0.4138 ha	<p>Landcom proposes to deliver a Pocket Park with playground facilities located within the centre of the precinct with an approximate area of 4,138 m².</p> <p>The area of the Pocket Park is additional to the Open Space provision originally planned for this precinct.</p> <p>The delivery of this pocket park improves accessibility in accordance with the DCP and allows for all residents within this stage of development to be located within 200m of useable Open Space which is the best practice as outlined in the Government Architect NSW framework 'Greener Places'.</p> <p>The area of this Pocket Park offsets the RE1 zoned land required for the provision of the east-west road (4,004 m²)</p> <p>A plan outlining this arrangement is shown in Figure 8 below.</p> 
5	0.2281 ha	The identified basin was originally to be located within the conservation land and has been shifted into Landcom's precinct 3 site and therefore the amount of useable Open Space has increased. Further, the DCP and Concept Plan identify that water cycle management facilities can be considered in the overall calculation of open space.
	10.1266 ha	

Figure 8. Location of east-west road vs Pocket Park

3.1 Open space outcome

Under the proposed plan of subdivision a total of **10.1266 ha** of land will be available for open space purposes, compared to only **9.67 ha** of land within the site zoned RE1 Public Recreation as originally planned. This results in a net increase of open space provision across the site of **0.4482 ha**.

Of the total **10.1266 ha** of open space, more than **1 ha** will be provided under the current DA through a new pocket park and combined drainage and open space land which provides an open space function consistent with the DCP and Concept Plan. Approximately **9.1 ha** of land will be available as active and passive open space to be provided by others in future.

The open space provision is shown in **Figure 9**.

It is noted that Landcom also proposes to dedicate a further **0.2703 ha** to National Parks and Wildlife (non-certified land zoned E1 National Parks and Nature Reserves) which provides a regional open space benefit, however we have excluded this land from our calculations of local open space provision.



Figure 9. Open Space Comparison Plan



4 Conclusion

GLN's assessment of open space provision has identified that the current development proposal will result in a net increase of:

- **0.4482 ha** of open space being provided when assessed against the background documents including the Concept Plan, DCP and zoning plan for Edmondson Park; and
- usable open space through the removal of water cycle management infrastructure from usable open space land.

The RFI response to Council should be accompanied by the technical advice from TfNSW or findings of the traffic assessment for the development application which confirms that road connections to Campbelltown Road are not supported by TfNSW, and the east-west connection to Zouch Road is necessary.

Should you need any further details or information to support, please do not hesitate to contact Jacob Hatch on 0432 278 986 or by email at Jacob@glntesting.com.au.

Yours faithfully

GLN PLANNING PTY LTD

PETER MCKENNA
ASSOCIATE DIRECTOR INFRASTRUCTURE AND DEVELOPMENT

Attachment 1 – TfNSW Advice



Transport for NSW

28 March 2024

TfNSW Reference: SYD24/00645/01
Council Reference: DA-83/2023 (CNR-54106)



Mr. John Ajaka
Chief Executive Officer
Liverpool City Council
Locked Bag 7064
Liverpool BC NSW 1871

Attention: Robert Micallef

**TFNSW MEETING WITH THE APPLICANT AT COUNCIL REQUEST
RESIDENTIAL SUBDIVISION LOTS 2,3 AND 5 DP 1272931
CAMPBELLTOWN ROAD, EDMONDSON PARK**

Dear Mr Ajaka,

Transport for NSW (TfNSW) is writing to Council advising that as per Council's request the Applicant for DA/83/2023, proposed residential subdivision of lots 2, 3 and 5, has met with TfNSW on 27 March 2024 to discuss potential road connections to Campbelltown Road (classified road) as part of the Development Application (DA). TfNSW advises that:

- The DA proposes a road connection to Zouch Road (local road) and notes the site constraints adjoining national park and reserve and bushfire prone land. TfNSW understands that Zouch Road connection via Public Recreation RE1 land is not supported by Council due to impacts to public space.
- As per TfNSW response dated 17 January 2024 (TAB A), TfNSW will not support or provide concurrence under section 138 of the *Roads Act, 1993* for any additional road connections to Campbelltown Road (classified road). TfNSW has formed this position via due view on road safety, consistency with clause 2.119 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021*, current practice under section 6.2.1 of TfNSW Guide to Traffic Generating Developments, which states 'access across the boundary with a major road is to be avoided wherever possible' and future network considerations of the Campbelltown Road corridor.
- The subject site benefits from local road access via Zouch Road and MacDonald Road.

With consideration of the above, it is imperative that the future road safety is considered, however having localised road access via Zouch Road will ensure even distribution of traffic across the localised network and support access for emergency services to access the National Park in the event of a Bushfire. However, the design of Zouch Road can ensure high quality urban design that seeks to not detract from the public space.

TfNSW would welcome a discussion with Council and the Applicant to discuss TfNSW position but also work collaboratively with all the parties to identify the way forward.

If you have any further questions, regarding this matter, please contact Zeliha Cansiz, Development Assessment Officer, via development.sydney@transport.nsw.gov.au.

Yours sincerely,

Brendan Pegg
Senior Manager Land Use Assessment Western and Central
Planning and Programs, Greater Sydney Division

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TAB A – TfNSW response 17 January 2024

Transport for NSW

17 January 2024

TfNSW Reference: SYD23/00522/04
Council Reference: DA-93/2023 and CNR-54/05



Mr. John Ajaka
Chief Executive Officer
Liverpool City Council
Locked Bag 7064
Liverpool BC NSW 1871

Attention: Robert Micallef

RESIDENTIAL SUBDIVISION
LOTS 2,3 AND 5 DP 1272931 CAMPBELLTOWN ROAD, EDMONDSON PARK

Dear Mr Ajaka,

Transport for NSW (TfNSW) is in receipt of Council's referral dated 20 November 2023 relevant to the residential subdivision on Campbelltown Road, Edmondson Park. The application was referred to TfNSW in accordance with s2.119 State Environmental Planning Policy (Transport and Infrastructure) 2021. TfNSW advises that:

- Campbelltown Road (classified road) is currently under investigation by TfNSW for potential future upgrades. Whilst this is unfunded and preliminary at this stage, TfNSW advise that Zouch Road / Campbelltown Road will be likely be designated left-in, left-out (LILO) in a future scenario.
- The development's proposed new road connection to Zouch Road was not included as part of the Edmondson Park Concept Plan (EPCP) approval.
- Council will be the relevant Roads Authority for this new road connection to Zouch Road (local road).
- The proposed development access strategy consists of distributing traffic from a new road connection to Macdonald Road (local) and new road connection to Zouch Road. It is TfNSW understanding is that when the new road connection and Macdonald Road meets the Traffic Warrants, traffic signals will be considered at this location as per the EPCP.
- No development traffic will be able to access the proposed development directly via Campbelltown Road, with the historic barracks not accessible for the development's traffic.

After considering the above, TfNSW recommends that the following requirements are included in any Development Consent issued by the relevant Planning Authority:

1. All buildings and structures together with any improvements integral to the future use of the site shall be wholly within the freehold property (unlimited in height or depth), along the Campbelltown Road boundary.
2. Detailed design plans and hydraulic calculations of any changes to the stormwater drainage system, new stormwater pits, the discharge into the existing pit or its connection to the existing pit are to be submitted to TfNSW for approval prior to the commencement of any works for any connection to Campbelltown Road (classified road).

Please send all documentation to development.sydney@transport.nsw.gov.au. A plan checking fee will be payable, and a performance bond may be required before TfNSW approval is issued.
3. The developer shall be responsible for all public utility adjustment/relocation works, necessitated by the above work, and as required by the various public utility authorities and/or their agents.
4. The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements in relation to landscaping and/or fencing, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1-2004, AS2890.6-2009 and AS 2890.2-2018 for heavy vehicle usage.
5. A Road Occupancy Licence (ROL) should be obtained from TMC for any works that may impact on traffic flows on Campbelltown Road, during construction activities. A ROL can be obtained through <https://myrta.com/opline2/pages/security/oplineLogin.jsf>.

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In addition to the above, TfNSW provides further advisory comment for the Planning Authority's consideration in determining the application and the Applicant to further consider:

- Council as the relevant Roads Authority should be satisfied with the proposed new road connections, design, and operation as part of this development, but also the interim access solutions proposed by the development. As the proposed development will increase the number of vulnerable road users (pedestrians and cyclists), TfNSW recommends that prior to any approval provided on the interim road access arrangement is given, an independent Road Safety Audit (RSA) is undertaken to ensure safe systems approach on the preferred design option.
- TfNSW advise that the proposed future signalisation of the Macdonald Road/General Boulevard will need to be referred formally to TfNSW for approval under section 87 (4) of the Roads Act, 1993. TfNSW advises that the Traffic Warrants will need to be met, however advises that the proposed signalisation is near the existing signalised intersection of Campbelltown Road/Macdonald Road, with the issue of the see-through effect potentially needing to be addressed.
- Consideration given to an increased setback to Campbelltown Road frontage of the development to not preclude any future network upgrade of the corridor to support the precinct growth.

For more information, please contact Zeliha Cansiz, Development Assessment Officer by email at development.sydney@transport.nsw.gov.au.

Your sincerely,

Brendan Pegg
Senior Manager Land Use Assessment Western and Central
Planning and Programs, Greater Sydney Division