LIVERPOOL CITY COUNCIL

Ref No.: SSD1-7/2025
Contact: Tony Hadchiti
Ph: 8711 7643
Date: 18 August 2025

Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Sent via email: sian.holmes@planning.nsw.gov.au

Re: Request for Council's Advice on SEARS

Dear Sian,

Liverpool City Council was invited to provide comments on the Planning Secretary's Environmental Assessment Requirements (SEARS) for the proposed development of an automated distribution facility at Lots 4-5, 6-7 and 8 Buchan Avenue, Edmondson Park.

Attachment A of this letter provides draft comments and information required for lodgement of an Environmental Impact Assessment.

Should you require further information or clarification, please feel free to be in contact.

Yours sincerely,

Tony Hadchiti
Planning Delivery Manager

Attachment A – Detailed comments and required information

1. Strategic Planning

Strategic Planning have significant concerns with the bulk and scale of the proposal, particularly with the blunt transition to adjoining zoned and developed R1 General Residential land which is characterised by low scale residential development. This rezoning will result in an expansion of the Edmondson Park Town Centre and will impact the amenity of the existing R1 General Residential area.

In order for an assessment to be completed, the following information is required to support the planning package:

- Out of Centre Development:
  The proposal is not a logical extension of the B4 Mixed Use. The RE1 land (Part Lot 40 Buchan Ave) acts as a transition from a high density to low scale environment.

  The objectives of the B4 Mixed Use Zone are:
  - *to provide a mixture of compatible land uses,*
  - *to integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.*

  Therefore, this rezoning will result in an extension of the centre zoning, which has been underpinned by significant strategic work. To provide local context, the only other area in the Liverpool LGA that contains B4 Mixed Use Zoning (or MU1 under the Standard Instrument) is the Liverpool City Centre. This is considered incompatible directly adjacent to a low scale residential area.

  The R1 General Residential zone already allows for some small-scale retail land uses. An additional permitted use with some maximum gross floor area controls for specific land uses such as supermarket / gym should be investigated as an alternative option.

- Bulk and Scale:
  Strategic Planning are concerned about the bulk and scale facilitated by this concurrent rezoning and SSD. Overshadowing, and Overlooking analysis is required.

  Council recommends the proposed height of building controls be reduced significantly.

- Infrastructure Demand:
  The proposed concurrent rezoning and SSD will result in an significant increase in infrastructure demand. The proposal should include justification how this is addressed as part of the rezoning.

Required Documents:

- Economic Impact Assessment including demand analysis for additional B4 Zoning in the area, and any additional retail land use (supermarket, gyms etc).
- Urban Design Report which includes analysis of bulk and scale, overshadowing of existing low scale residential dwelling, surrounding open space and schools.
- Infrastructure Demand Analysis
- Open Space Needs Analysis (including the additional needs as a result of additional density)
- Community Facilities (including the additional needs as a result of additional density)
- Social Impact Assessment
- Traffic Impact Assessment
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2. Urban Design

The Urban Design Team (CDPD) has been actively involved in the assessment of DA-855/2022, DA-1245/2022, and DA-1090/2022, which pertain to the historic address of Lot 101 Buchan Avenue. Since 2022, the team has completed multiple rounds of referrals for the approved development proposal across these sites, all of which are associated with the above State Significant Development (SEARs).

General

While the intent of the proposed development for Sites 3, 4, and 5 is understood, the broader benefits of departing from the planning parameters established under MOD 5 are unclear. At this stage, development on these sites should remain consistent with MOD 5, which provides a clear strategic vision for Edmondson Park's growth and precinct structure.

In this regard, the proposal should include a clear response outlining how it aligns with, or intentionally departs from, the guidance and direction established in the following MOD 5 documents, including benefits and justification for any changes to:

- *Edmondson Park Landcom Town Centre North – Public Domain and Landscape Plan (Taylor Brammer)*
- *Edmondson Park Landcom Town Centre North Design Guidelines (Willow Tree Planning)*
- *Edmondson Park Town Centre North – Master Plan – Urban Design Report (Roberts Day)*
- *Design Excellence Strategy – Landcom Town Centre North – Edmondson Park.*

From the above documents, a number of key urban design considerations should be addressed, including (but not limited to):

- Achieving a high-quality of design (e.g., Design Excellence) that is specific to Edmondson Park and the broader Liverpool the LGA
- Integration of the new street layout, including New Maxwell Crescent.
- Response to local heritage and environmental values, including retention and integration of native and endemic vegetation within architectural and landscape designs.

- Respect for the established character of the Parkland, Maxwells Creek, and Station Precincts.
- Provision for vehicular, pedestrian, and active transport connectivity.
- Strong connections to surrounding open spaces, including Clermont Park and the Maxwells Creek Corridor.
- Streetscape design guided by a landscape-led approach, including the unique treatment of local roads (minor and major), Buchan Avenue North, and Maxwell Crescent.
- Public domain design elements, including paving, furniture, and tree placement, size, and species selection.
- Incorporation of public art in line with the Public Art Framework.
- Protection and enhancement of key viewpoints.
- Delivery of the intended outcomes of the overall Master Plan, particularly for the Maxwells Creek and Parkland Precincts etc.

Context

As noted in the Scoping Report, the site is located approximately 330m from Edmondson Park Train Station and directly adjacent to a future high school currently under construction. It is also about 400m northwest of the Frasers Ed. Square Town Centre, placing it within a highly accessible and active urban setting. This proximity raises questions about the need for an additional mixed-use precinct on Sites 3, 4, and 5, given that they are located outside the designated Station Precinct, yet in proximity to the established town centre.

The combined sites at 4–5, 6–7, and 8 Buchan Avenue, surround and share a significant interface with both the existing primary school and the new high school on adjacent lots. Consequently, the proposed development, including built form, setbacks, landscaping, site interfaces, facades, street presence, and public domain design, must carefully consider potential impacts on both schools, such as amenity, overshadowing, and privacy. It should also consider implications for site access, movement, usage, and the overall streetscape character along Buchan Avenue and surrounding streets.

In this context, questions are raised regarding the suitability of the proposed rezoning from R1 General Residential to B4 Mixed Use, and the proposed increase in maximum building height from 21 metres to approximately 50 –135 metres. Both school sites were planned under existing provisions anticipating an R1 zoning framework. The current proposal, however, introduces a built form more characteristic of the town centre, resulting in a significantly denser urban environment immediately adjacent to the schools, which is an outcome that was not considered during the site selection, planning and design stages and is now too late to be addressed.

The 2-hectare site adjacent to Site 5, previously identified as part of the School Site in the Edmondson Park South Concept Plan, is now intended for residential development (as part of downsizing of the school site under MOD 5) but is not included within this proposal nor does it appear to be under common ownership. Accordingly, this proposal should clearly demonstrate:

- how it will address the currently undeveloped residential site;

- how the proposed development will influence and shape its future development potential; and
- whether it is likely to remain subject to the existing development provisions under the R1 zoning or be subject to uplift through the broader rezoning proposal.

Built Form + Scale

The proposed unified redevelopment of the currently vacant and underutilised sites (i.e., sites 3, 4, and 5) is an optimistic initiative within the context of the rapidly evolving Edmondson Park precinct.

It is noted, however, that the existing approved DAs for Sites 2, 3, 4, and 5 (identified in the scoping report) already represent well-considered, high-quality, and contextually responsive outcomes for each location – which are individually significant and respond well to the existing planning provisions. Each was subject to a rigorous Liverpool specific - Design Excellence process - to ensure high-quality urban design outcomes were being achieved for each site.

In this context, there is concern regarding the proposed built form, particularly the substantial increases in height and density across multiple sites as part of a single, overarching development proposal – which blurs the lines between the established precincts.

Given the potential for this development to exert an even greater influence on the character of Edmondson Park, a rigorous Design Excellence process is strongly encouraged. It is noted in the Scoping Report that a design review process is not required for this project. However, there is concern that by proceeding through the State Significant Development (SSD) pathway, the proposal for each of the sites in question can effectively bypass Council's Design Excellence process (i.e., design review process) - thereby reducing the opportunity for a comprehensive design review of each site and the specific needs and nuances of Liverpool to be adequately considered.

While the proposed mix of shop-top housing, co-living, affordable housing, and both build-to-sell and build-to-rent residential flat buildings (RFBs) may offer merit and contribute towards greater housing diversity, the overall scale and intensity of the proposal represent a significant departure from the original Edmondson Park vision, the approved DAs, and even the uplift envisaged under MOD 5 - which already provides an opportunity to develop housing typologies which address the 'missing middle', encouraging terraces in addition to detached dwellings apartments and studio dwellings.

Given the magnitude of the changes proposed, a high level of research, investigation, planning, design, and justification will be required for to assess the suitability and overall value of the development proposal, particularly the rezoning, in the context of the surrounding low-density residential communities, open spaces, and the Edmondson Park town centre.

Density

Edmondson Park is structured around three clearly defined precincts - Station, Maxwells Creek, and Parkland - each with its own planning parameters and character, guiding the area's evolution around the distinct separation created by the Maxwells Creek corridor. This structure is reinforced by the extensive work undertaken as part of MOD 5.

The proposal extends Station Precinct style built-form across the Maxwells Creek corridor into the Maxwells Creek and Parkland Precincts, substantially increasing density, height, and land use intensity, and departing from the established vision, scale, and character of these areas.

In this context, a core design principle for Edmondson Park is the “high–low” approach, concentrating taller buildings in the Station Precinct and stepping down in scale to semi-detached terraces, cottages, and low-density housing to the west. The Maxwells Creek vegetated corridor provides a visual termination for taller buildings, offers highly desirable north-facing views, and functions as a natural separation between precincts. Heights within the Maxwells Creek Precinct are intended to transition between the Station Precinct and the Parkland Precinct and ultimately integrate with surrounding existing residential areas. The current proposal on sites 3,4 and 5 risks undermining the intended transition of built form and scale across the precincts – linking the existing low density residential to the established town centre.

To address these concerns, the proposal must incorporate a clear transition strategy that balances urban consolidation with contextual sensitivity. This should involve modulated building heights, generous setbacks, layered landscaping, and articulated built form to create a softer visual and spatial interface. Edge treatments should minimise visual dominance while enhancing connections with the public realm, neighbouring residences, and the Maxwell Creek corridor, ensuring seamless integration into the surrounding context whilst clearly maintain a distinct transition of built form and scale.

In addition, the proposal should also provide a detailed and evidence-based justification for effectively extending the Edmondson Park Town Centre through rezoning of the existing R1 to B4, comparatively to the provisions permissible under MOD 5. This should clearly demonstrate the need for the increased density, calculate anticipated population growth, and address the resulting demand on infrastructure including community facilities, open space, road networks and public spaces along with measures to mitigate these impacts.

Sustainability

Active transport should be supported through well-designed bicycle access, secure parking, and safe, legible circulation routes within each proposed section of the development including each building. The proposal should demonstrate how internal active transport routes connect seamlessly to the surrounding network, streetscapes, nearby open spaces, and the town centre, ensuring accessibility, functionality and ease of use.

A comprehensive range of sustainability principles and measures should be fully integrated into the overall development proposal as well as the design of each individual building and precinct. This should include adopting industry-leading strategies that promote energy efficiency, resource conservation, and environmental performance. Key sustainability initiatives should encompass the incorporation of renewable energy technologies, such as photovoltaic (solar) panels, water-sensitive urban design, sustainable materials selection, and passive design principles that optimise natural light and ventilation. The proposal should clearly demonstrate how these measures contribute to long-term resilience, reduce carbon footprint, and align with best-practice sustainability frameworks.

Landscape

The site has previously been cleared and contains no existing vegetation. However, it historically would have supported native vegetation that should be reinstated and strengthened as part of

this proposal, where feasible. Council strongly encourages a landscape-led approach be applied to this development.

Trees are a vital component of Liverpool's natural and cultural landscape. The Liverpool LGA currently experiences a significant deficit in canopy coverage, ranging between 15–21%, which exacerbates the urban heat island effect (UHIE) in areas like Austral and Edmondson Park. As such, Council is committed to retaining, maintaining, and increasing tree canopy coverage throughout the LGA. This includes prioritising the inclusion of native canopy trees (species with a mature height of 8m or more), both within public domain and private landscapes, to help mitigate the UHIE. The selection of tree species should be guided by the Preferred Species List found on pages 56–63 of Council's adopted Tree Management Technical Guidelines.

1.2. The proposal must demonstrate consistency with the canopy coverage targets outlined on pages 71–73 of Liverpool City Council's Tree Management Strategy. This includes meeting or exceeding the minimum canopy cover targets identified for different land use types (including zonings). However, at a minimum, an average of 30% across the entire development site, encompassing landscape areas, open spaces, streetscapes, plazas, and other public realms should be achieved.

1.3. Given the scale of the development, its proximity to large publicly accessible green spaces, and the potential impact of increased built form and density on community access, connectivity, and sense of belonging, it is strongly recommended that the proposal facilitates and strengthens publicly accessible connections to the Maxwell Creek Corridor where feasible (particularly within Site 5). Additionally, establishing a pedestrian green link connecting the Maxwell Creek Corridor to Clermont Park via Sites 3 and 4 would significantly enhance precinct integration and help mitigate the creation of a built form barrier. This green link would improve permeability, walkability, and reinforce connections between the development, adjacent open spaces, and the broader Edmondson Park community network.

2. **Public Domain**

2.1. The site fronts Buchan Avenue, Horrie Road, Bezentin Ridge Road, and the new Maxwell Creek Crescent, meaning it will have a significant impact on Edmondson Park's public domain. A detailed, integrated public domain design developed collaboratively between Urban Design, Architecture and Landscape teams is essential to achieve an optimal outcome for the public domain.

2.2. Given the expected increase in local population, the development must include public domain infrastructure along all frontages and publicly accessible areas that can cater to the expected population and demographics. This should include, but is not limited to paving, awnings, seating, bins, bollards, bike racks, drinking fountains and lighting etc.

2.3. All street designs must be generally consistent with the typologies established in the MOD 5 documentation, including relevant plans, details, and sections submitted to demonstrate this.

2.4. Street tree planting is required on all streets, meeting the canopy targets outlined on pages 71–73 of Liverpool City Council's Tree Management Strategy and using species from the Preferred Species List on pages 56–63 of the Council's Tree Management Technical Guidelines (TMTG).

2.5. Street trees should be a minimum of 200L pot size at installation. Tree pits should be constructed with stratacells and structural soil trenches, providing soil volumes that meet TMTG requirements. Detailed street tree construction information including dimensions, soil volume, materials, tree grates, species selection, and any necessary relocation of underground services should be considered.

2.6. The public domain proposal must, at minimum, include:

- Proposed public footpath details (width, material to Council specifications) along all site frontages; note if footpaths terminate at new driveways (indicating pedestrian priority).
- Proposed street lighting, benches, bins, paving, bike racks, bollards, and other street furniture.
- Locations and species of all proposed and retained street trees and other vegetation (including turf).
- Existing and proposed kerb and gutter works, including removal of disused driveways laybacks and crossovers.
- Proposed driveway laybacks and crossovers, designed with treatments ensuring safe footpath and driveway intersections that prioritise pedestrians, active transport and promote traffic calming.

Amenity

The proposal includes approximately 1,827 dwellings with a portion of ground-floor retail and some public domain upgrades including a new plaza featuring through-site pedestrian links. Given the site's close proximity to the diverse retail and civic amenities provided Frasers Ed. Square Town Centre, the need for additional retail in this location is unclear. A detailed needs and urban design analysis justifying the proposed retail offerings and their placement within the development should be provided**.**

Utilities and services such as electrical substations and fire hydrants must be integrated sensitively within the building design and landscaping to preserve visual amenity. Public domain plans, both architectural and landscape should clearly indicate the location and orientation of any substations and fire hydrant boosters. These elements should be positioned so that their shorter facade faces the primary street frontage and be screened with landscaping or appropriate materials to minimize visual impact. Details on screening measures, including materials and planting, should be provided.

Aesthetics

Given the scale and diversity of built form typologies across the three sites, the design must incorporate a broad range of architectural expressions, detailing, and materials. Creating distinct character areas within different sections will help break down the building mass, avoid monotony, and foster a strong sense of place for future residents. This variation should be intentional and contextually sensitive, contributing to a rich, layered urban environment while maintaining overall cohesion and strong connections to the surrounding context, including the Maxwell Creek corridor.

For developments with multiple buildings and entrances, pedestrian entries and associated spaces should be clearly differentiated to improve wayfinding and legibility throughout the site.

This can be achieved through architectural detailing, varied materials, and distinct planting species and colours.

Required Documentation:
In addition to the intended documentation outlined within this referral and the submitted Scoping Report, it is recommended the applicant submits the following documentation:

A. Acoustic Report
Required for any sensitive uses on a classified or busy road. It must be prepared by a suitably qualified acoustic consultant.

B. Architectural Plans
The applicant must provide a full set of Architectural Plans including a site plan, site analysis, demolition plan, precinct plan, floor plans, elevation, and section.- for each individual building being proposed. In addition, the application must ensure:

- All plans include a title block with the site address, applicant's name, architect, plan number, date produced, scale and position of true north.
- All plans must show the immediate public domain, street layout and proposed design.
- Public vs private open spaces within the proposal must be clearly identified and must demonstrate the purpose and function of the proposed public spaces and connections with the street network and surrounding public open space including active transport, walking, and cycling.

C. Crime Prevention Through Environmental Design (CPTED) Report
Details how the development has been designed to reduce opportunities for crime by implementing a variety of design and place management principles. The report should be prepared by a social planner with experience in CPTED.

D. Detailed Schedule of Materials and Finishes
Including all proposed building, landscaping materials and finishes. Must include corresponding elevation and/or 3D renders per the required Visual/View Impact Assessment.

E. Façade Study
Demonstrating response to the surrounding character, while also mitigating the bulk, scale and repetitiveness of the built form.

F. Urban Design Report
The applicant must submit a comprehensive Urban Design Report covering (at a minimum):

- Analysis of existing site conditions and context

- Proposed bulk, scale, and overshadowing impacts on surrounding low-density residential areas, schools, and open spaces
- Comparison with existing planning controls, approved DAs, and MOD 5 provisions
- Assessment of pedestrian networks, connectivity, and active transport integration
- The overall vision for built form, open spaces, streetscapes, and movement networks.

G. Architectural Design Report

The applicant must provide a detailed Architectural Design Report that includes:

- The design rationale and concept underpinning the proposed built form and architectural expression
- Materiality, façade treatments, and articulation strategies to ensure visual interest and mitigate perceived bulk
- Integration of utilities and services (e.g., electrical substations, fire hydrants) within the architecture and landscaping to minimize visual impact
- Strategies for creating distinct character areas and varied architectural identities across the development to avoid monotony and foster a strong sense of place
- Design approaches to enhance legibility and wayfinding through differentiated building entries and pedestrian spaces, employing variations in architectural detailing, materials, landscaping, and colour palettes
- Consideration of sustainability in architectural design, including passive design principles and incorporation of industry-leading technologies, where feasible.
- Response to the surrounding context, ensuring appropriate scale transitions and harmonious integration with adjacent precincts and public realms.
- Demonstrate consistencies with the relevant guiding design documents and planning provisions relating to RFB, Co-living, Affordable Housing and BTR typologies.

H. Landscape Package

A Landscape Package is to be provided as part of the SSDA submission, which must be prepared by a suitably qualified AILA registered landscape architect and include the following:

- Landscape analysis
- Proposed vegetation positioning
- Spacing, Quantity, Pot size, Species etc
- Clear trunk height (1.8m unobstructed – where required)
- Canopy coverage (demonstrate consistency with the TMS)
- Mature height and spread.
- Planting schedule identifying the native, endemic, or exotic status of each species including mature height and spread.
- Consideration of the Liverpool City Council Tree Management Policy, Strategy and Technical Guidelines documents.

I. Public Domain Plan

A Public Domain Plan is to be provided as part of the SSDA submission demonstrating how the development interfaces with the public domain, and the works to be delivered as part of this project. Drawings and annotations should include:

- Clarity as to what is being delivered as part of this project, and what is being delivered by others, what is existing and what is being upgraded
- Existing and proposed pedestrian footpath upgrades and embellishment to Council specifications
- Proposed street trees at 200L pot size and pit details
- Driveway and laybacks including proposed finishes and gradients
- Detailed treatments for the safe intersection of footpaths & driveways
- Connection paths, linking all pedestrian access points to the public footpath
- Existing / proposed kerb and gutter embellishment
- Removed existing driveway layback and crossovers no longer used
- Landscaping and turf
- Existing and proposed road safety barriers
- Consistency with the MOD 5 road network and street sections
- All of the above to Council Specifications

J. Streetscape Elevations/Sections

- Elevations of the streetscape including neighbouring existing developments and future potential developments demonstrating how the development ties in with its surrounding context.
- Sections of proposed streets to demonstrate consistency with the required street typologies.

K. Architectural renders/Photomontages

- Illustrating how the development sits within the streetscape and include surrounding context, neighbouring properties and how proposed landscaping ties in with the public domain.
- Views from surrounding open or key public spaces

L. Visual Analysis and Impact Assessment

Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed, likely future surrounding development key view corridors, culturally significant vistas etc. Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that outlines how these impacts are being addressed.

3. Traffic

The proposal seeks to deliver approximately 1,827 residential apartments across fifteen towers (ranging in height from 4 to 40 storeys) within a mixed-use precinct adjacent to key public infrastructure, including Edmondson Park Public School (currently almost at capacity of 1,000

students plus staff) and the new Edmondson Park High School, which is currently under construction and expected to accommodate approximately 2,000 students plus 165 staff.
From a local traffic and transport planning perspective, Council holds significant concerns regarding the **cumulative impact** of this scale of residential intensification in close proximity to multiple large educational facilities and within an already constrained road network.

Key Concerns

Traffic Congestion and Network Capacity
The surrounding local road network, particularly Buchan Avenue, already experiences considerable traffic volumes, particularly during school drop-off and pick-up times. The addition of nearly 2,000 new dwellings is likely to generate substantial increases in vehicular activity. Without corresponding investment in traffic capacity improvements, intersection upgrades, and traffic management measures, the proposal is expected to exacerbate congestion and reduce the safe and efficient operation of the network—particularly during peak school periods.

On-Street Parking Pressures
There is already insufficient on-street parking available in the area to adequately accommodate existing demand generated by school-related activity. The proposed development includes a high proportion of apartments, co-living, and potentially build-to-rent formats, which may contribute further to local parking demand. Without careful management, this may result in illegal or unsafe parking practices—including within school zones, across driveways, and near pedestrian crossings—posing safety risks and creating enforcement challenges.

Traffic and Pedestrian Safety
The concentration of students, parents, residents, and service vehicles in a limited road environment introduces heightened risks to pedestrian safety, particularly during school periods. The existing street and crossing infrastructure may be inadequate to safely accommodate the increased pedestrian volumes and interactions with vehicle movements associated with both the schools and the proposed development.

Emergency Access and Circulation
The potential for traffic congestion and informal parking to obstruct vehicle circulation may impede emergency vehicle access to both the schools and the proposed residential buildings. Council is concerned that this could compromise safety and response times during peak periods or emergency situations.

Construction Phase Impacts
Council notes that the development is likely to require a multi-stage construction program with significant truck movements and construction traffic in a location immediately adjacent to operating and soon-to-open schools. Without carefully staged construction and management plans, this activity could pose risks to student safety, disrupt traffic flow, and affect local amenity.

Traffic Recommendations

In light of the above, Council strongly recommends that the following matters be incorporated into the SEARs and addressed in the Environmental Impact Statement (EIS):

1. **Traffic, Transport and Accessibility Impact Assessment**

- Must model cumulative traffic impacts, including school peak periods, late night trading periods and peak commute periods (both AM and PM).
- Should include consultation with Council and Transport for NSW (School Infrastructure).

2. **School Zone Road Safety Audit**
- A road safety audit should be undertaken for all streets and intersections within 400m of the development site, with a particular focus on school zone activity, pedestrian crossing facilities, and traffic calming.

3. **Parking Provision and Management Strategy**
- Council recommends the proposal provide off-street parking in excess of minimum standards, particularly for larger or family-oriented dwellings.
- A parking management plan should address visitor parking and peak demand scenarios.
- A Loading Dock Management Plan (LDMP) shall address service vehicle parking needs and access. Access locations to be located to minimise conflicts with high pedestrian movement corridors (eg Shared Path locations or similar), especially access frontages that are located opposite school areas or within designated school zones.

4. **Construction Traffic Management Plan (CTMP)**
- To be developed in consultation with Council and the Department of Education.
- Should include restrictions on haulage and delivery times to avoid school peak periods and ensure the safety of school children and pedestrians.

5. **Pedestrian and Cycling Infrastructure**
- Upgrades to pedestrian pathways and crossings should be delivered as part of the development to support safe and convenient access to and from surrounding schools and the station.
- Opportunities for traffic calming or separated pedestrian zones should be investigated.

6. **Staging of Development**
- Consideration should be given to aligning development staging with the delivery of key transport upgrades and school access measures to ensure upgrades are aligned with community needs.

Given the sensitive location of the site, its proximity to major educational facilities, and the anticipated scale of residential growth, Council stresses the importance of integrating safety, traffic, and infrastructure planning at the earliest stages of the proposal. Council is committed to working collaboratively with the applicant, relevant agencies, and the Department to ensure that these issues are appropriately addressed through the assessment process.

4. Natural Environment

It is recommended to include native species relevant to local ecological communities for landscaping purposes.

Incorporate raingardens into those landscaping areas where feasible.

In addition, it is recommended to integrate rainwater harvesting systems for use in passive irrigation of landscaped and turfed areas, as well as for non-potable uses where appropriate.

Create wildlife corridor between the natural areas where feasible.

Stormwater management in and for natural areas.

Capture overall surface runoff from both permeable and impermeable into the bio-retention / biofiltration systems incorporated with long term functional water quality improvement mechanism, prior to the runoff enters the public drainage network, or natural areas, including but not limited to water bodies, e.g., dams, flowlines or creek lines.

Ensure that low flow enters the vegetation layers first and filters through the sub layers underneath prior to entering the outlet pipe.

The acoustic and light impacts during both construction and post-construction phases, including daytime and nighttime effects, as well as impacts on natural sunlight and shadow, should be assessed, resulting from the development infrastructure.

5. Heritage

Due to the scale of the development proposal, it is recommended that the applicant undertake a Connecting with Country process as per the NSW GA guidelines and provide an outcomes which report which outlines the process taken, the Elders and Knowledge Holders engaged, the outcomes of the consultation and how these outcomes have been integrated into the overall design of the proposal. It is further recommended that DPIE direct the application to ensure that all aspects of the design of the proposal are up for discussion with Elders and Knowledge Holders and the process is not restricted to landscape features or peripheral aspects.

6. Flooding

The subject properties (Sites 1–5) are located adjacent to the left bank of Maxwells Creek in Edmondson Park and are not impacted by creek flooding.

A comprehensive stormwater quantity management strategy and supporting plans must be developed for the proposal. The strategy should include a stormwater report detailing the proposed management system, incorporating hydrologic and hydraulic assessments for a range of storm events up to and including the 1% AEP event. Catchment plans must be provided for both the site-specific and external catchments, covering pre- and post-development conditions.

The development must incorporate appropriate water quality treatment measures to manage stormwater prior to discharge into receiving environments, applicable to both interim and ultimate development stages. These measures should meet Council's stormwater quality performance objectives. MUSIC modelling software must be used for the design of treatment systems, and compliance with Council's water quality targets must be demonstrated.

A detailed stormwater management report addressing both quantity and quality aspects is required, along with concept-level stormwater plans and drawings. Electronic copies of all hydrologic and hydraulic models, MUSIC models, and their associated results files must also be provided for assessment.

7. Environmental Health

State Environmental Planning Policy (Resilience and Hazards) 2021

The SSD Scoping Report states that "many contamination studies and environmental site investigations have been undertaken to assess the extent and nature of contaminants within the Edmondson Park South site, both through the approved Concept Plan and the subsequent DA approvals obtained by Urban on all sites. Whilst this will be addressed in the upcoming SSDA, Accordingly, the question of contamination has been effectively resolved through existing approvals which cover the entire subject site."

However, the proposed use, architectural plans and basement excavation including groundwater will be required to be considered in any contamination assessment supporting the application.

Stage 1 - Preliminary Site Investigation

The proposed development may be impacted by contaminated soils. The *State Environmental Planning Policy (Resilience and Hazards) 2021 Clause 4.6* requires a consent authority when assessing a development application to consider whether the land is contaminated, it is suitable in its contaminated state for the purpose for which the development is proposed to be carried out, and/or if the land requires remediation, it is satisfied the land will be remediated before the land is used for that purpose.

A suitably qualified and experienced contaminated land consultant is to prepare a Stage 1 - preliminary investigation for the property. The preliminary site investigation is to comply with guidelines made or approved by the NSW EPA under the Contaminated Land management Act 1997 and identify all past and present potentially contaminating activities; identify potential contamination types; discuss the site condition; provide a preliminary assessment of site contamination; and assess the need for further investigations.

If contaminating activities are suspected or known to have occurred, or if the site history is incomplete it may be necessary to prepare a Stage 2 – Detailed Site Investigation. This investigation shall give regard to the potential effects of any contaminants on public health, the environment and building structures and shall meet the sampling density outlined in the NSW EPA Contaminated Sites Sampling Design Guidelines (2002).

Where the Stage 2-Detailed Site Investigation indicates that the site poses unacceptable risks to human health or the environment, a Remedial Action Plan (RAP) shall be prepared by a suitably qualified and experienced Contaminated Land Consultant in accordance with applicable guidelines made or approved by the NSW EPA under the Contaminated Land Management Act 1997. In these circumstances, the Remedial Action Plan shall be referred to Liverpool City Council for review.

Note: 'Suitably qualified and experienced contaminated land consultant' means someone who is certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) Scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) Scheme.

The report's cover or title page of the document shall include a personalised electronic seal for either the CEnvP(SC) or CPSS CSAM scheme.

Council is unable to recommend specific consultants or auditors.

Acoustic Assessment
The proposed development may be a source of offensive noise and potentially impact upon human health and amenity. An acoustic report shall be prepared by a suitably qualified acoustic consultant in accordance with the NSW Environment Protection Authority's 'Noise Policy for Industry' (2017). The **cumulative effect** of **noise** must be considered when assessing the **impact upon receivers.**

Where necessary, the report shall assess potential sleep disturbance and road traffic noise impacts in accordance with the NSW Environment Protection Authority's 'Noise Policy for Industry' (2017) and 'NSW Road Noise Policy' prepared by the Department of Environment, Climate Change and Water NSW (DECCW NSW) dated March 2011. The project noise trigger levels for the proposed development shall be selected according to the most stringent intrusive or amenity criteria. If required, recommendations and noise control measures shall be specified to achieve compliance with the assessment criteria. The assessment shall be representative of all noise generating activities on-site including but not limited to mechanical plant, patrons, deliveries and motor vehicle movements.

When assessing noise levels at commercial or industrial premises, the noise level shall be determined at the most affected point on or within the property boundary. Alternatively, when gauging noise levels at residences, the noise level shall be assessed at the most affected point on or within the residential property boundary. Where necessary, sound levels shall be adjusted in accordance with NSW Environment Protection Authority's guidelines for tonality, frequency weighting, impulsive characteristics, fluctuations and temporal content.

Note: 'Suitably qualified acoustic consultant' means a consultant who possesses Australian Acoustical Society membership or are employed by an **Association of Australasian Acoustical Consultants (AAAC) member firm.**

The report's cover or title page must confirm membership details or include a watermark for the relevant certification body.

Council is unable to recommend specific consultants or auditors.

Construction Noise and Vibration Assessment
Given the location of the proposed development, the inclusion of an underground basement carpark and the close proximity to existing residential dwellings, a site-specific Construction Noise and Vibration Assessment prepared by a suitably qualified acoustic consultant shall be submitted for review. The Construction Noise and Vibration Assessment must include an assessment of expected noise impacts and detail feasible work practices to be adopted to avoid, remedy or mitigate construction noise and vibration impacts.

The Construction Noise and Vibration Assessment shall take into consideration and be consistent with the following documents:

- 'Interim Construction Noise Guideline' published by the Department of Environment and Climate Change NSW (DECC 2009/265) dated July 2009,
- Assessing Vibration: A Technical Guideline published by the Department of Environment and Conservation (NSW EPA), February 2006
- Structural damage criteria as presented in German Standard DIN4150-Part 3 "Structural vibration in buildings – Effects on structures" and British Standard BS7385-Part 2: 1993 "Evaluation and Measurement for Vibration in Buildings.

The assessment is to include, but not necessarily be limited to the following information:

- Identification of nearby residences and other noise sensitive land uses;
- Assessment of expected noise and vibration impacts;
- Detailed examination of feasible and reasonable work practices that will be implemented to minimise noise and vibration impacts;
- Strategies to promptly deal with and address noise and vibration complaints;
- Details of performance evaluating procedures (for example, noise and vibration monitoring or checking work practices and equipment);
- Methods for receiving and responding to complaints;
- Procedures for notifying nearby residents of forthcoming works that are likely to produce noise and vibration impacts; and
- Reference to relevant licence and consent conditions.

Note: 'Suitably qualified acoustic consultant' means a consultant who possesses Australian Acoustical Society membership or are employed by an Association of Australasian Acoustical Consultants (AAAC) member firm.

The report's cover or title page must confirm membership details or include a watermark for the relevant certification body.

Council is unable to recommend specific consultants or auditors.

Residential Accommodation on Land in or Adjacent to a Rail Corridor

Council's records indicate that the proposed residential accommodation is located on land in or adjacent to a rail corridor that may be adversely impacted by noise or vibration. To address Clause 2.99 of State Environmental Planning Policy (Transport and Infrastructure) 2021, the Development Application shall be supported by an acoustic report prepared by a suitably qualified acoustic consultant for the noise sensitive development.

The acoustic report shall take into consideration any guidelines issued by the Director-General including the NSW Department of Planning document titled 'Development Near Rail Corridors and Busy Roads- Interim Guideline' dated December 2008. The proposed development may generate additional traffic and affect existing residential or other noise-sensitive land uses. Therefore, road traffic noise impacts may need to be assessed in accordance with the 'NSW Road Noise Policy' prepared by the Department of Environment, Climate Change and Water NSW (DECCW NSW) dated March 2011.

Note: ‘Suitably qualified acoustic consultant’ means a consultant who possesses Australian Acoustical Society membership or are employed by an Association of Australasian Acoustical Consultants (AAAC) member firm**.**

The report's cover or title page must confirm membership details or include a watermark for the relevant certification body.

Council is unable to recommend specific consultants or auditors.

Waste Storage (retail tenancies)
The garbage/waste storage area shall be clearly identified on the site plan and be located within the proposed building. The designated garbage/waste storage area shall comply with the following requirements:

a) The room shall be fully enclosed and provided with a concrete floor, and with concrete or cement rendered walls coved to the floor;
b) The room shall have a floor waste which is to consist of a removable basket within a fixed basket arrestor and is to comply with Sydney Water requirements; and
c) The door to the room must be tight-fitting, self-closing and fitted with mechanical ventilation.

Please refer to AS4674-2004 Design, construction and fit out of food premises and Liverpool Development Control Plan 2008 for further information regarding the construction standards for waste storage areas.

Sydney Water Sewerage Infrastructure
The development must provide for a physical sewage connection to each created allotment to enable the method of sewage disposal by gravity reticulation mains to either Sydney Water branch and trunk sewers or Sydney Water point of treatment. Liverpool City Council will not accept any temporary facilities to service the site including pump out wells.

The proposed development may be within a Sydney Water servicing area which may be impacted by a restricted number of lots that can connect to this infrastructure. Further information regarding this can be found via the following link:

Growth Servicing Plan (sydneywater.com.au)

Sydney Water Trade Waste Requirements
Consideration shall be given to Sydney Water trade waste requirements should any retail food premises be proposed for the commercial/retail proponents of the development. Details regarding the proposed capacity and location of the grease trap in accordance with Sydney Water requirements system shall be required.

Detailed Floor and Section Plans for Vehicle Wash Bays
Detailed floor and section plans shall be provided for any proposed vehicle wash bays. The plans to be submitted with the Application must include the following information:

a) Environmental safeguards such as trafficable bunds installed at the entry and exits of the vehicle/ equipment wash bays to prevent contamination of the surrounding environment;
b) The roof covering the vehicle/ equipment wash bays shall contain an overhang of at least 10º to prevent rainwater intrusion. Uncontaminated rainwater shall be directed from the canopy and other roofed areas into stormwater drains;
c) The location of any oil/water separator or pre-treatment device for the vehicle and equipment wash bays and their connection to Sydney Water's sewer in accordance with a Trade Waste Agreement;
d) The location of spill kits, stormwater pits and stormwater drainage infrastructure. A detailed drainage diagram shall be submitted with the Application to clearly identify the proposed location of surface drains, sewerage and stormwater infrastructure;
e) Separate approval is required under the Local Government Act 1993 as the Applicant intends to hold or process sewage that is to be subsequently discharged to the public sewer; and
f) Manufacturer's specifications for any pre-treatment devices to be installed at the subject premises;

Separate Application for Use
Each separate commercial/retail occupancy shall be subject to submission (and approval by Council), of a separate Development Application for its fit out and use.

8. Waste Management

Liverpool Council is limited to strictly domestic waste services only, all areas of the proposed development that are 'non-residential' in nature must have a separate waste service, supplied through a licensed private waste contractor. This includes any areas of the development that are effectively short term accommodation for a fee; this includes hotels, motels, serviced apartments etc. Also, as a result of the division of waste disposal between Council-run and privately contracted services, completely separate waste facilities and infrastructure will be needed for each.

The waste team would encourage the Applicant's design team to seriously consider the viability of providing a static compactor, compacting waste into a 23 cubic metre steel bin at a 3:1 compaction ratio, as is in use at Ed Square Town Centre. The collection in that instance is carried out with a hook-lift truck, with all the height and access requirements that engenders.

All waste collection will take place off-street, within a designated Waste Collection Bay or Bays, that are integrated into the design of the development. If a waste collection area can be made to serve more than one building, then so much the better. The design of the waste collection area, and the path of travel leading to and from it, must permit free access by a Heavy Rigid Vehicle (HRV) of the following specification and turning characteristics – lift type is 'Rear'.

Vehicle lift type	Length	Width (at cab and mirror to mirror)	Height (inc. safe clearance)	Weight (loading)	Turning Radius
Side	9.5m	2.5m, 3.0m	3.9m	24.0t	Kerb to kerb 10.3m Wall to Wall 11.0m
Rear	9.9m	2.5m, 3.0m	3.9m	23.5t	Kerb to kerb 10.5m Wall to Wall 11.5m

For the table above, the only dimension which has a 'factor of safety' built in already is the height – all other dimensions are actual, which means that a 'safety margin' must be added on in order to ensure that the waste trucks do not come in contact with the structure of the building, or its assorted services or signage. If a hook-lift bin is being considered then the height in the area where the bin is being loaded must have a clear head height, free of structures, services or signage, of 4.5 metres.

Council will require swept path turning diagrams to support the fact that a truck of the above dimensions can do the necessary waste collection with, at maximum, a three-point turn. Further points to keep in mind when designing truck access are:

a) Any ramp that will convey a waste truck has a maximum gradient of 1:7
b) Any access control that will permit access to the waste collection area must remain on site, and not have to be brought by the waste contractor.
c) Domestic waste collection from the site in question will take place once per week only, therefore all domestic bin storage areas have to be designed to take the bins needed for an entire weeks' worth of waste from the residents.
d) The preferred path of travel from council's domestic waste contractor is that the truck be able to reverse straight back into the waste collection area, empty the bins, and drive straight out.
e) Entry of trucks onto the private property of the development will require a standard indemnity to be signed, to cover Council, its employees and contractors while on site.
f) The waste collection area must be of a size that permits the waste truck to be parked fully within it, with enough space to accommodate the footprint of the bins to be emptied, plus enough free space at the rear of the truck for the waste operative to empty and cycle the bins.

Each building that will be split off to become a separate strata will require its own full complement of waste infrastructure, equipment and signage. The only exception to this requirement will be for the static compactor, should it be introduced. In that case, confirmation would have to be given that a legal document will be created that details how that resource will be shared and funded between more than one strata. Although Liverpool City Council does not have its own document covering expected rates of waste generation for different types of use, the volume of bins needed and hence the sizes of various bin storage areas, can be supported by reference to the expected waste generation rates in the publication from City of Sydney Council, "Guidelines for Waste Management in New Developments."

There is a strict need to segregate domestic and commercial/industrial wastes, all waste chutes, bin storage rooms and associated infrastructure must be specific to either domestic waste or commercial/industrial waste. All wastes must be kept strictly separate at all times, with no access by residents to commercial waste rooms, and vice versa. All commercial waste must be kept separate at all times from point of disposal, to where it leaves the building in the relevant truck.

All residents must have convenient access to a waste disposal point - residents should not have to walk more than 30 metres from their front door to dispose of their daily waste items. The expectation of Council as far as a development with a footprint as large as this, is that waste chutes will be provided in each tower. This will either be a triple chute, one for each type of waste that will be collected (organic food waste, co-mingled recycling, and residual), or a dual chute plus an MGB (Mobile Garbage Bin) housed in the same bin cupboard, for the co-mingled recycling. If the double-chute option is selected, then serious thought and commitment will have to be given as regards to the amount of work and the hours required from the regular building cleaners or maintenance staff.

A single waste chute with an e-diverter system may be accepted, (plus catch bins at each disposal point for co-mingled recyclables) providing that the building, or part thereof that is being serviced with this system, is not more than 10 storeys in height. There will be at least one waste room at the base of each tower where waste materials will be temporarily stored, until aggregated ready for collection. Also, if co-mingled recycling has to be decanted from 240L MGBs to larger bulk bins for collection by the waste truck, a bin lifter will be required by that strata.

Please note, the requirement for all NSW Councils to provide an integrated organic waste collection system has been mandated, in the recently passed “Protection of the Environment Legislation Amendment (FOGO Recycling) Bill 2024.” Therefore, the number of distinct waste streams to be designed for is 3, not 2. This may also affect some commercial areas of the development, for example the any supermarkets, cafes, restaurants or food halls and childcare centres, if they are responsible for preparing and serving food – the relevant legislation should be read to see if and when these other uses within the development will be captured by these requirements and the Regulations that go along with them.

Consideration that 110 litres of general waste, 110 litres of co-mingled recycling and 20 litres of food waste will be generated per residential unit, irrespective of number of bedrooms. The bulk bins which Council has available for general waste and recycling will be either 660L or 1100L, and for obvious reasons, all doorways, corridors etc. on the bin paths of travel must permit free passage of the bin size selected. Compaction of 660L general waste bins containing residual waste **only** would be allowed up to a maximum of 2:1 ratio – 1100L bins are not permitted to be compacted at all.

With regard to bulky household waste storage, Council takes guidance on the approximate number of dwellings as being 1827 (Page 5 of the Beam SSD Scoping Report). Council would be expecting that a total dedicated bulky household waste area of not less than 294 m^2 be set aside for the temporary storage of their household items. This obviously would need to be apportioned across the various buildings, commensurate with the number of domestic households that each building will contain.

Each bulky household waste storage area must have double leaf doors, to facilitate the storage of larger items of furniture, a minimum clear head height of 2.1 metres, and must have prominent permanent signage denoting it's use. This ensures that all these materials can be kept within the building envelope, and that there will be no excuse for placing any household items at kerbside, a problem that has historically affected the appearance, cleanliness and property values of the Liverpool LGA.

It is expected, that when the EIS is lodged, it will detail the controls that will be placed upon the residents and commercial tenants with respect to waste. This is to ensure that there is a high level of knowledge amongst residents and commercial tenants of the requirements from building management and Council regarding various types of waste. Whilst Council will not become involved in writing by-laws for the development for obvious reasons, Council will want to see that by-laws and controls will be enacted. These should cover, as a minimum, safe and correct use of waste infrastructure and equipment, process to be followed for wastes generated at move-in or move-out of residents/tenants, and controls to ensure no dumping of waste or unwanted items, either in non-designated parts of the common areas of the development, or on public land.

Careful consideration should be given to the provision of cameras and recording technology to monitor waste disposal points, and ensure that correct waste practice is being followed. Enforcement of waste issues by building/strata management, and sheeting home responsibility for damage/repairs will be much more effective if there is visual evidence identifying the parties concerned.

Refer to Council's DCP 2008 (as amended) for typical details of Waste Room construction and fit out. Permanent signage is to be supplied to each waste disposal point, detailing not only the safe operation of the chute hoppers, but clear pictorial information as to the correct materials that go into each chute, or into the recycling catch bins, if used.

Given the size of the development, and the availability of space, this development would be ideal for a clothing bin, a dedicated cage for electronic items, or for rigid polystyrene packing materials, kept under the control of management, as this would keep all these materials out of the conventional waste bins. Also, given that there are over 1800 residential units, combined with what will undoubtedly be food premises in the commercial portion of the development, consideration should be given to having a bio-conversion unit from Goterra, or similar supplier, to allow food waste to be processed on site.

9. Landscaping

This site is located under the Development Control Plan (DCP) – Edmondson Park South November 2012. The following sections have come from the respective DCP and should be implemented. Please note these points from the DCP have been summarised.

5.0 Detailed Residential Subdivision Design

In higher-density residential areas, the quality of streetscapes and public spaces is crucial. Tree planting enhances visual appeal and helps define the character of streets and neighbourhoods. Street furniture should prioritize pedestrian comfort and convenience, create visual harmony, and help define spaces like streets and pathways. This guidance applies to land zoned R1 General Residential.

5.1 Streetscapes

Objectives:

Coordinate landscape elements and infrastructure during subdivision to reduce conflicts and visual clutter.

1. Maintain a high standard of public domain treatment in higher-density residential areas.

Controls:

- A Public Domain Plan (PDP) must be submitted with the subdivision application, aligning with the streetscape and public domain principles outlined in Table 9 (found on pages 42 and 43 of the Edmondson Park South DCP 2012).

6.7 Landscaped Area

Objectives:

- Promote high-quality, water-efficient planting and landscaping that reduces potable water use.

Controls:

- New dwellings must provide landscaped areas according to lot size:
    - 200–300 m² lots: 10% landscaped area
    - 300–450 m² lots: 15% landscaped area
    - 450–600 m² lots: 20% landscaped area
    - 600 m²+ lots: 30% landscaped area
- Landscaped areas should:
    - Enhance residential amenity with space for outdoor use
    - Improve outlook and usability of private open space
    - Include the first 1 meter from the front boundary as soft landscaping (excluding driveways/footpaths)
    - Have at least a 500mm planted strip between driveway and side boundary with native species
    - Use plants and pavements that integrate with the surrounding area
    - Support diverse vegetation types and sizes
    - Be irrigated with recycled water where possible

Note: Landscaped area excludes buildings, structures, paved areas, and pools.

6.8 Principle Private Open Space

Objectives:

- Provide high residential amenity with space for outdoor recreation and relaxation.
- Enhance the quality, outlook, and usability of private open space.
- Ensure good solar access to living areas and private open spaces.

Controls:

- Minimum PPOS required based on lot size:
  - Lots under 300 m²: 16 m² with at least 3 m width
  - Lots over 300 m²: 24 m² with at least 4 m width
- PPOS location and design should:
  - Offer opportunities for outdoor use and relaxation
  - Consider lot orientation, dwelling layout, neighbouring properties, and landscape features
  - Enhance space quality and usability
  - Minimize overshadowing and protect sunlight access to neighbours' outdoor spaces
- In Small Lot Housing Areas on southern, eastern, or western street sides, PPOS can be at the front as a garden court, veranda, or balcony, provided it's usable and adjacent to a living area.

Note: PPOS refers to accessible outdoor recreation spaces like decks, patios, or paved areas with a gentle slope (less than 1:50).

It is recommended to include native species relevant to local ecological communities in the landscaping to support the natural environment. The main ecological community in this area is the Cumberland Plain Woodland. For your reference, a copy of the species list can be found at Cumberland Plain Woodland Critically Endangered Ecological Community Listing.

10. Community Planning

Compatibility

The proposal has the potential to support the local community. However, the bulk and scale of the development are not compatible with local characteristics, which is a concern. The SEE needs to provide any justification for the proposed massive intensification.

The proposal is an over-development comparing the size of the land and neighborhood. The proposed height and density would potentially impact on the adjacent developments, local roads and particularly on the proper functioning of the future high school. We recommend reducing the mass and density of the concept aiming for sustainable development.

SIA

The proposal needs to submit a Social Impact Assessment (SIA) following NSW Planning Guidelines. The DPHI states, 'All State significant projects need to prepare a Social Impact Assessment (SIA) in accordance with the Secretary's Environmental Assessment

Requirements (SEARs).The guideline is supported by a Technical Supplement and Scoping Worksheet'.

Additionally, we recommend reviewing the SIA Policy & Guidelines of Liverpool Council: https://www.liverpool.nsw.gov.au/development/assessment-panels/social-impact-assessment

The SIA should include demographic analysis, local needs assessment and potential impacts of the proposal. If any negative impact is identified, the SIA should suggest required mitigation measures. The SIA should conduct a stakeholder consultation to include local community and stakeholders in the decision-making process.

Section 8.0 of the scoping report mentions key matters requiring further assessment in the EIS and the proposed approach. It **didn't include SIA.**

Social Infrastructure Needs Assessment
The proposal should include a social infrastructure needs assessment to identify the increased demand due to the proposed development. If any gap is identified, the assessment should recommend additional infrastructure and community facilities for future consideration of the relevant authorities.

Section 8.0 of the scoping report mentions key matters requiring further assessment in the EIS and the proposed approach. It **has included** Social Needs Assessment (p 26).

Housing mix & Accessibility
The scoping report refers, 'The project proposes to provide a 15% affordable housing contribution.'

However, there is no mention of adaptable housing. Our research refers, '*in 2021, 15,269 people (or 6.5% of the population) in Liverpool LGA reported needing help in their day-to-day lives due to disability. This was a similar percentage to 2016 and much above than the Greater Sydney Ratio (5.2%)* Liverpool Disability Inclusion Action Plan (DIAP 2024-2028) promotes '*accessibility and Universal Design Principles in new and existing residential and commercial developments and in the design of public spaces*'.

The proposal should include adequate number of 3 or more bedrooms to accommodate a diverse range of families following Council's commitment and DCP amendment (20%). Certain percentage of the entire housing mix should be developed with adaptable standards (at least 10% following Council DCP). The percentage of affordable housing should be increased more (i.e. 30%) to include wider community needs addressing local socio-economic disadvantage.

Community Safety & Wellbeing
The precinct design should consider accessibility and CPTED analysis for the benefit of the wider community.

11. Public Art

Council notes that there is an existing public art strategy for Edmondson Park South developed for Landcom by Place Partners, 2012. Council recommends that given the significance of the site and the extensive amendments proposed for the site that public art is conditioned in line with the Western Sydney Aerotropolis Development Control Plan 2022 (Aerotropolis DCP) Section 2.19. Due to the scale of the development proposal, it is recommended that the Objectives for public art align with the Aerotropolis DCP;

O1. Enrich and enliven the public and private domain with high quality, aesthetic, and functional art.

O2. Provide public art consistent with Council's Public Art Policy

O3. Recognise and celebrate Aboriginal heritage, values and living culture in the public domain.

Council recommends that a Public Art Plan is developed for each development within the site that exceeds $20 million or 20 Hectares. Public art should reflect endemic narratives and provide concrete opportunities to support the Local Creative Industry to align with the Federal and State Cultural Strategies and secure creative and innovative solutions for future residents and transient and active audiences. Council recommends that public art is integrated into the architectural facades to ensure durability, minimised maintenance costs and support significant wayfinding opportunities to support a diverse community.

12. Contributions

The site is located within Edmondson Park North and is subject to the Liverpool Contributions Plan 2008 – Edmondson Park (CP).

Council is currently negotiating a Voluntary Planning Agreement (VPA) with Landcom in Edmondson Park North. This agreement has been in negotiation for several years and forms part of a coordinated approach to infrastructure delivery for the precinct.

The proposal appears to be progressing separately from the draft VPA and broader precinct planning for Edmondson Park North. The Scoping Report provides little explanation of how the development would align with or contribute to this existing work.

Proceeding in isolation raises concerns about the potential for uncoordinated infrastructure delivery, including risks of duplication, service gaps, or unfair cost burdens being placed on other landowners.

Recommendations

It is requested that the following matters be addressed in the Environmental Impact Statement (EIS):

- Clearly articulate how the proposal would interact with and impact:
    - Existing infrastructure planning for Edmondson Park North

    - The draft VPA being developed by Landcom and Liverpool City Council
    - The Contributions Plan
    - Delivery timing and cost distribution of key infrastructure

- Identify any cumulative infrastructure impacts and address how these will be managed

- Demonstrate how the proposal aligns with precinct wide infrastructure planning, including fair cost apportionment and coordinated delivery.

- Engage with Council to negotiate a new VPA for the site that:
    - Reflects the NSW Planning Practice Note on VPAs and Council's VPA Policy
    - Aligns with established approaches to infrastructure staging and funding in Edmondson Park North
    - Ensures contributions are appropriately tailored to the specific impacts of the proposal.

- Submit supporting technical reports to inform infrastructure planning, including (but not limited to):
    - Traffic and Transport Assessment
    - Infrastructure Impact Assessment
    - Social Infrastructure Assessment
    - Utilities Infrastructure Assessment

Transport for NSW

NSW GOVERNMENT

Planning and Assessments
Department of Planning, Housing, and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Attention: Sian Holmes 5 August 2025

STATE SIGNIFICANT DEVELOPMENT APPLICATION
Secretary's Environmental Assessment Requirements (SEARs) Stage - SSD-88953706
Lots 4-5, 6-7 and 8 Buchan Avenue, Edmondson Park
Edmondson Park Mixed-Use development

Dear Sir/Madam,

I refer to the Department's Major Project Portals' notification for the above State Significant Development application.

The Department is advised that TfNSW, via Instrument of Delegation from the Secretary of Transport and from TAM (Transport Asset Manager of NSW), has been delegated to act as the rail authority for the heavy rail corridor, electrical supply authority, and Agent on behalf of the Land Owner; and to process the review of this proposal.

TfNSW/Sydney Trains (as Rail Authority) has reviewed the preliminary information associated with the draft SEARs, and advises that in order to protect rail land, assets, operations, and to ensure a safe and reliable rail service, it is requested the Department include the following items into the SEARs:

1. **Consultation with Sydney Trains prior to the lodgement of the Environmental Impact Statement (EIS) via email to west_interface@transport.nsw.gov.au**
2. **The following rail specific documentation should form part of the EIS to ensure rail protection is adequately factored into the design:**

    a) A Rail Impact Assessment Report, endorsed by a TfNSW Asset Management Branch Technically Assured Organisation (TAO).

    This report must specifically address how the development will comply with TfNSW AMB Standard 'Airspace and External Developments' and be accompanied by supporting documents as required under the standard.

    b) Detailed Survey Plans signed off by a registered surveyor showing the proposed development in relation to the property boundary, rail corridor, rail assets (including nearest rail track), existing rail corridor access gate, TAM Land/easements.

    c) Cross Sectional Drawings signed off by a registered surveyor showing the proposed development in relation to the property boundary, operational rail corridor, rail assets (including nearest rail track), existing rail corridor access gate, TAM Land/easements.

    d) Documentation detailing Sydney Trains' ongoing 24/7 access to the rail corridor from Buchan Avenue on Site 5, including:

        i. Road design and plans showing the relationship of the road to the proposed development and rail corridor access gates

        ii. Swept paths demonstrating that a minimum 25m long vehicle can satisfactorily enter and exit the rail corridor via the existing access gate along the southern boundary of the site from Buchan Avenue

iii. Confirmation the two way road from Buchan Avenue to the rail access gates will be dedicated to Council as public road

e) Landscape Plans confirming no trees will obstruct the path of travel leading into the access gate that enables access to the operational rail corridor

f) Geotechnical Report

g) Structural Report and Drawing(s)

h) Drainage and Civil Plan(s)

i) Dilapidation report for the adjoining wall

j) Evidence of adherence to TfNSW Asset Management Branch standard 'Airspace and External Developments' (T HR CI 12090 ST)

3. Advisory comments

a) The EIS must consider the Department of Planning and Environment's '*Developments near Rail Corridors and Busy Roads – Interim Guideline' 2008*;

b) No drainage from the development is permitted to be discharged to the rail corridor or TAM land;

c) No works are permitted in the rail corridor, on TAM (Transport Asset Manager of NSW) land or airspace, including craneage and other aerial operations;

d) Any openings (windows, balconies, and the like) within 20m of, and facing, the rail corridor must be fully enclosed or have measures installed (e.g., louvres, window restrictors, protection screens etc) to prevent the throwing of objects onto rail infrastructure facilities or into the rail corridor;

e) Should any removal and/or replacement of rear fencing between TAM land and the subject site be proposed, the Applicant should consult with Sydney Trains prior to the lodgement of the EIS and ensure that a survey is undertaken so that any replacement fencing is located on the surveyed boundary; and

f) A minimum 1.5m setback for any structure along the boundary shared with the TAM land and the rail corridor shall be maintained, unless it can be proven all structures can be maintained and constructed in less than 1.5m and endorsed by Sydney Trains. This is to ensure construction, and the future maintenance of any structures can occur without impact, use or reliance on TAM land or the rail corridor.

Please contact the TfNSW Town Planning Management team via email to DA_sydneytrains@transport.nsw.gov.au should you wish to discuss this matter. Finally, it is requested that when the SEARs is issued, notification is provided by the Department.

Sincerely,

Maddison Pooley
A/Town Planning Manager
Transport for NSW

Sydney WATER

7 August 2025 **Our reference**: N/A

Sian Holmes
Department of Planning, Housing and Infrastructure
sian.holmes@planning.nsw.gov.au

RE: Sydney Water input to SEARs for SSD-88953706 at 8 Buchan Avenue, Edmondson Park (HDA Pathway)
Edmondson Park Mixed Use Development

Thank you for seeking Sydney Water's input on the Secretary's Environmental Assessment Requirements for the development proposal at 4-5, 6-7 and 8 Buchan Avenue, Edmondson Park.The project comprises a concurrent Rezoning Proposal and SSDA which will seek consent for the following:

- Rezoning Proposal:
  - Amendment of planning controls under the State Environmental Planning Policy (Precincts – Western Parkland City) 2021 (Precincts SEPP) by:
    - Rezoning the site from R1 General Residential to B4 Mixed Use.
    - Increasing the maximum building height from 21 metres to 50-135 metres.
- SSDA Proposed Development:
  - Construction of fifteen (15) residential towers, ranging in height between 4 to 40 storeys, over five (5) podiums including mixed use podiums on Site 5.
  - Basement car parking.
  - Associated landscaping and public domain improvements, including a public plaza.

A Section 75W Modification currently applies to the approved Concept Plan (MP10_0118) and will seek to amend the Concept Plan boundary to ensure consistency across the planning framework.

The proposed development will facilitate the delivery of 1,827 dwelling units and a total Gross Floor Area (GFA) of 158,213m^2.

The proposed development has been declared a State Significant Development through the Housing Delivery Authority pipeline. Sydney Water requests that the Department of Planning, Housing and Infrastructure (the Department) include the following Secretary's Environmental Assessment Requirements relating to the provision of water-related services for the subject site:

Water-related Infrastructure Requirements

1. The proponent of the development should determine service demands following servicing investigations and demonstrate that satisfactory arrangements for drinking water, wastewater, and recycled water (where required) services have been made.
2. The proponent must obtain endorsement and/or approval from Sydney Water to ensure that the proposed development does not adversely impact on any existing water, wastewater or stormwater main, or other Sydney Water asset, including any easement or property. To do this, it is required that the proponent register a direct **Feasibility** enquiry with Sydney Water as soon as possible via an approved Water Servicing Coordinator (WSC) to ascertain servicing needs and to ensure the proposed development is considered in any potential planning, land

requirements, existing or future easements that we might be undertaking or investigating.

3. When determining landscaping options, the proponent should take into account that certain tree species can cause cracking or blockage of Sydney Water pipes and therefore should be avoided.
4. The proponent should consider taking measures to minimise or eliminate potential flooding, degradation of water quality, and avoid adverse impacts on any heritage items, and create pipeline easements where required.
5. Strict requirements for the protection of Sydney Water's stormwater assets may apply to this site. The proponent should ensure that satisfactory steps/measures been taken to protect existing stormwater assets, such as avoiding building over and/or adjacent to stormwater assets and building bridges over stormwater

Integrated Water Cycle Management (IWCM)

6. The proponent should outline any sustainability initiatives that will minimise/reduce the demand for drinking water, including any alternative water supply and end uses of drinking and non-drinking water that may be proposed, and demonstrate water sensitive urban design (principles are used), and any water conservation measures that are likely to be proposed. This will allow Sydney Water to determine the impact of the proposed development on our existing services and required system capacity to service the development.
7. It is required that the proponent engages directly with Sydney Water via the Feasibility process and discuss IWCM opportunities.

Growth information

Sydney Water supports government-backed growth initiatives within our area of operations, striving to provide timely and cost-effective water and wastewater infrastructure without undue impacts. To offer robust servicing advice and investigate staged servicing possibilities, we require **anticipated ultimate and annual growth data** for this development as outlined in the enclosed Growth Data Form.

A **Feasibility application** will enable a comprehensive servicing review ensuring the proposed development is considered in any potential planning that we might be undertaking. Failure to provide this information may impede proper planning requirements for the proposed development and for the broader area. The completed growth form should be submitted by the proponent to Sydney Water as part of the Feasibility application via a Water Servicing Coordinator (WSC), citing this referral response.

Next steps

- Given the scale and complexity of the proposed development further investigations will be required to determine the servicing requirements for this site. It is recommended that a Water Servicing Coordinator is engaged as soon as possible, and a **Feasibility** application is submitted with Sydney Water **prior to the preparation of the EIS**.
- The proponent should complete and return the enclosed Growth Data Form as part of their Feasibility application submission. The Growth Data Form should be updated promptly with Sydney Water in case of changes.
- The Department is advised to forward the enclosed *Sydney Water Development Application Information Sheet (for proponent)* to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides more information on Infrastructure Contributions.

If the proponent has any questions, they should contact Sydney Water Account Manager, Nicholas McLachlan, at nicholas.mclachlan@sydneywater.com.au or their Sydney Water case manager once a Feasibility is lodged. Should the Department require further information, please contact Fiona Feng from the Growth Analytics Team at urbangrowth@sydneywater.com.au.

Yours sincerely,

Growth Analytics Team
Growth and Development, Water and Environment Services
Sydney Water, 1 Smith Street, Parramatta NSW 2150

Enclosed:

- Sydney Water Development Application Information Sheet (for proponent)
- Sydney Water Growth Data Form

Transport for NSW

29 July 2025

TfNSW Reference: SYD25/00907/01
DPHI Reference: SSD-88953706

Ms Kiersten Fishburn
Secretary
Department of Planning, Housing, and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Attention: Sian Holmes

REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)
EDMONDSON PARK MIXED-USE DEVELOPMENT
8 BUCHAN AVENUE, EDMONDSON PARK

Dear Ms Fishburn,

Thank you for providing Transport for NSW (**TfNSW**) an opportunity to provide input to the Secretary's Environmental Assessment Requirements (**SEARs**) for the proposed Edmondson Park mixed-use development at 8 Buchan Avenue, Edmondson Park.

TfNSW has reviewed the submitted scoping report and requests the following requirements in **TAB A** to be addressed as part of the future Environmental Impact Statement (**EIS**) transport and traffic impact assessment component.

Should you have any questions regarding the above matter, please contact Annelly Ketheson, Land Use Planner, on phone 9983 2731 or via email at development.sydney@transport.nsw.gov.au

Yours sincerely,

Brendan Pegg
Senior Manager Land Use Assessment Central and Western
Transport Planning, Planning Integration and Passenger Division

TAB A – TfNSW suggested requirements

- An analysis of the existing traffic network, including the road hierarchy, current and future daily peak hour (light and heavy) vehicle movements and existing and future performance levels of nearby intersections.
- A forecast of additional daily and peak hour vehicle movements because of the proposal and identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cycle conflict).
- Undertake traffic and network modelling to understand the impacts of the development site on key local intersections and key state intersections (using SIDRA modelling or similar at 5-year intervals), plus any traffic changes as a result any planned or committed road projects.
- Proposals to mitigate any traffic impacts, including intersection upgrades to achieve acceptable performance.
- Details of car parking provision, having regard to relevant parking rates, specifications and standards.
- Details of proposed vehicular access, loading and unloading deliveries and servicing arrangements, and any proposed infrastructure improvements or measures to reduce potential conflicts with pedestrians and cyclists.
- Swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site.
- Details of road upgrades, infrastructure works, or new roads or access points required for the development.