

Ms Sian Holmes
Senior Planning Officer, Housing Delivery Authority SSD Assessments
Department of Planning, Housing and Infrastructure
Level 4, 6 Stewart Avenue
NEWCASTLE WEST NSW 2302

Email: sian.holmes@planning.nsw.gov.au
CC: Trent.Wink@planning.nsw.gov.au

Dear Ms Holmes

Re: Edmondson Park Mixed-Use Development – SSD-88953706 – 4-8 Buchan Avenue, Edmondson Park

Liverpool City Council ("Council") welcomes the opportunity to provide the Department of Planning, Housing and Infrastructure (DPHI) with advice regarding a proposed mixed-use development (SSD-88953706) located at 4-8 Buchan Avenue, Edmondson Park.

The notification letter stipulates that the State Significant Development (SSD) Application seeks approval for a mixed-use development over three (3) sites comprising:

- 14 residential towers over five podiums, ranging in height from 2-40 storeys;
- 1,805 dwellings (including 274 affordable and 180 co-living dwellings);
- Ground-level retail (child-care centre, gym, retail and supermarket);
- Basement car parking;
- Landscaping and public domain upgrades;
- Public library; and
- A new plaza with through-site link.

In order to facilitate the above development, the letter advises that the exhibition is for a concurrent rezoning proposal which seeks to amend the *State Environmental Planning Policy (Precincts – Western Parkland City) 2021* to:

- Increase the Height of Buildings for Site 3: 12m to 52m, Site 4: 12/21m to 88m and Site 5: 15m to 135m;
- Propose a Floor Space Ratio (FSR) control for Site 3 of 3.7:1, Site 4 for 5.4:1 and Site 5 for 5.3:1;
- Exclude the proposal site from 'Area 1';
- Exclude the proposal site from requiring a Development Control Plan; and
- Permit 'commercial premises' as an additional permitted use on Site 5.

Council notes that the above Proposal arises from two Expression of Interests (EOI) submitted to the Housing Delivery Authority (HDA) by the Proponent, Urban Property Group (UPG). Both EOIs were subsequently declared as SSD by the Minister for Planning and Public Spaces on 12 June 2025.

Council acknowledges the significant opportunity the SSD, and concurrent rezoning proposal, would deliver for Edmondson Park, providing well located, accessible and diverse housing options – including affordable and co-living housing – within close proximity to Edmondson Park Station.

Council further acknowledges that the SSD would deliver additional community benefits including a centre-based childcare facility, a significant affordable housing component, retail land uses including a supermarket and the proposed development and dedication to Council of a 1,300m² public library via a yet-to-be negotiated Planning Agreement.

Council does however note that the proposed yield exceeds the current development approval for the subject sites – Modification 5 (MOD 5) – by an additional 1,200 dwellings. The associated services and infrastructure demand generated by these additional dwellings is not captured by the two “live” Planning Agreements for Edmondson Park – Edmondson Park Town Centre (South) with Frasers Property Australia (VPA-39) and Precincts 3, 5 and 9, Edmondson Park with Landcom (VPA-45) – that will be delivering the bulk of essential infrastructure (i.e. transport, drainage, open space, community infrastructure) for the Precinct.

Despite the supporting studies included with the SSD Application, Council is concerned that the additional population associated with the 1,200 dwellings – an extra 2,079 residents according to the Social Impact Assessment (Appendix GG – HillPDA Consulting, February 2026) – will create an infrastructure deficit for the broader Precinct, particularly in the areas of open space, community infrastructure and educational facilities.

With regards to the proposed affordable housing component of 274 dwellings, Council strongly recommends consideration be given to condition that the affordable housing component should remain in perpetuity rather than the current proposal for 15 years. This would deliver greater long-term benefit for the Edmondson Park community and ensure consistency with the updated HDA EOI Criteria 3.3 which stipulates:

“Where the uplift sought through a concurrent rezoning is significant, the affordable housing offering should be provided in perpetuity, recognising the substantial benefit in uplift to the Proponent.”

Finally, Council notes the inclusion of a Draft Letter of Offer (LOO) included with the SSD Application (Appendix G). Although Council has had preliminary discussions with the Proponent in relation to the proposed public library referenced in the Draft LOO, Council is not included as a signatory to a future Planning Agreement.

Given Council would be the ultimate recipient of the public library – and any additional infrastructure required to meet the future demand of the additional population, Council should be a party to the Planning Agreement and provided opportunity to formally review and respond to the Draft LOO.

Furthermore, any future Planning Agreement that includes Council as a party will need to be prepared in accordance with Council's updated Planning Agreements Policy, with associated infrastructure needs identified through an Infrastructure Needs Assessment and the proposed sequencing of infrastructure delivery outlined in an Infrastructure Services Delivery Plan (ISDP).

Detailed comments from across the relevant Council portfolios is provided for consideration in **Attachment 1**. Council welcomes the opportunity to unpack our collective feedback with the DPHI in the coming weeks.

Should you require any further information on this matter, please do not hesitate to contact Sunehla Bala, Council's Coordinator Strategic Planning, via email at balas@liverpool.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Hannan', with a long horizontal flourish extending to the right.

Mark Hannan
Manager City Planning

Attachments

Attachment 1 – SSD-88953706 – 4-8 Buchan Avenue, Edmondson Park – Consolidated Council Feedback

Attachment 1 – SSD-88953706 – Council Submission

Strategic Planning

Scale and Built Form

The Proposal intends to significantly increase the maximum permissible FSR and Height of Buildings (HOB) controls across the three subject sites. The height increases are summarised in *Table 1*.

Table 1 – Existing and Proposed Height of Buildings

<i>Site</i>	<i>Current Height of Buildings</i>	<i>Proposed Height of Buildings</i>	<i>Percentage Increase</i>
Site 3	12m	52m	333%
Site 4	Part 12m & Part 21m	88m	633% & 319%
Site 5	15m	135m	800%

The considerable increase in building height is likely to overshadow the educational facilities immediately adjacent to the subject sites, as such, solar access should be considered in conjunction with building design. In addition, the scale contemplated in the Proposal will ultimately result in an extension of the Edmondson Park Town Centre. This is considered an inappropriate outcome as the existing RE1 land provides a logical buffer between the Town Centre and low and medium-density residential zones north and west of the subject sites.

Finally, the substantial increases in density associated with a single Planning Proposal has the potential to undermine the boundaries of the established Precincts within Edmondson Park.

Affordable Housing

The Proposal includes a total of 1,805 dwellings, of which 274 dwellings are proposed to be dedicated as affordable housing and 180 dwellings as co-living units. Given the significant residential uplift proposed, the 274 affordable housing apartments should at minimum remain as affordable housing in perpetuity. This is consistent with the updated HDA EOI Criteria 3.3 which stipulates:

“Where the uplift sought through a concurrent rezoning is significant, the affordable housing offering should be provided in perpetuity, recognising the substantial benefit in uplift to the Proponent”.

Furthermore, Council also notes that in apartment buildings of this scale (particularly with lifts, gyms, pools, etc), strata fees often become unaffordable for residents to purchase an apartment. This concern is reflected in the recent Australian Bureau of Statistics (ABS) data for the Liverpool Local Government Area (LGA).

Family Friendly Apartments

The Liverpool Development Control Plan 2008 (LDCP 2008) includes apartment diversity controls requiring that a minimum of 20% of apartments are to be three (3) bedrooms or greater, 5% be studio and 10% be one-bedroom apartments. As a minimum, the proposed apartment mix associated with the Proposal should demonstrate compliance with the apartment diversity controls within the LDCP 2008 to address the demographic requirements of the LGA.

Contributions Planning

The SSD includes a Letter of Offer (LOO) to enter into a Planning Agreement under Appendix G, which lists the parties of agreement as the proponent and the NSW Minister for Planning and Public Spaces. Despite this, the key item offered in the letter is for the construction of a two-storey community facility / library to be dedicated to Council (noted as the Minister nominee).

Given the contribution item offered is a local in nature and includes dedication to Council, it is recommended that Council be included as a party to the future Planning Agreement and provided opportunity to formally review and respond to the Draft LOO.

Furthermore, any future Planning Agreement that includes Council as a party will need to be prepared in accordance with Council's updated Planning Agreements Policy, with associated infrastructure needs identified through an Infrastructure Needs Assessment and the proposed sequencing of infrastructure delivery outlined in an Infrastructure Services Delivery Plan (ISDP).

Urban Design

Site Vision

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

The Planning Proposal extends the Station Precinct character and 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.

Amenity Impacts

The shadow diagrams provided with the Planning Proposal demonstrate that the buildings on Sites 3 and 4 along the northern frontage of Buchan Avenue will overshadow the adjacent high school facilities in winter, affecting the amenity of that facility. The proposed built form should be modulated in a way that results in no shadows cast.

The proposed built form in Site 3 also results in communal open spaces being overshadowed by the built form to the north in mid-winter, limiting the amenity outcomes and potential uses for future residents.

Tree Canopy & Landscaping

Council is committed to retaining and increasing tree canopy coverage across the Liverpool 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 urban heat. The selection of tree species should be guided by the Preferred Species List found in Council's Tree Management Technical Guidelines.

Street Activation

The following issues are raised in relation to street activation:

- a) The positioning of the heavy vehicle access point within the frontage to Maxwells Creek reduces the ability to activate the frontage to the Creek. The development effectively turns its back on the creek at the lower levels, which is a poor urban design outcome, and results in poor amenity for future residents and users of the site;
- b) The proposed supermarket and retail areas are excessive and poorly integrated with the surrounding urban context;
- c) Pedestrian access to the lobby of Building B in Site 4 is located opposite to the service vehicle entry and service areas for Buildings C and D in Site 3. This is a poor urban design outcome as the location of lobbies should be away from areas of poor visual amenity and passive surveillance; and
- d) Passive surveillance and activation of the public domain is very poor at the southern elevation of Site 5. The frontage is dominated by inactive facades with the loading dock access, the waste rooms and substation at Ground Level, plant rooms at Level 1, and the communal co-living area in Level 2.

Childcare Facility

Emergency egress from the proposed childcare facility on Site 5 is fully reliant on the emergency stairs within the residential lift lobbies. This raises concerns with the operation of the facility and management of children exiting the centre in the case of an emergency.

Considering the scale of the Proposal, alternative locations of the childcare facility should be considered which are directly accessible from the Ground Floor and preclude the need for use of emergency stairs by large groups of pre-school aged children.

Active Transport

Buchan Avenue is a designated on-road cycleway. Active transport should be further 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 currently fails to 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.

Urban Design Recommendations

The following recommendations are made:

- a) A transition in building height with the lowest height fronting onto Buchan Avenue, consistent with the areas of Bernera Road, north of the Town Centre, which have recently developed, or are currently under development. A middle building height on either side of the corner of Buchan Avenue with Maxwells Creek, establishing and defining the corner in terms of built form, and the tallest building height on the southern end of Site 5;
- b) This height transition would establish the 'high-low' model, between the south and the north of the site, which is in keeping with the 'high-low' model that applied to the Station Precinct;
- c) The childcare centre be relocated to the Ground Floor of Site 3, adjacent to the proposed library, Clermont Park, and the schools, generating a small community centre and reinforcing this 'educational corridor', which is directly accessible from the adjacent residential areas and main road (Buchan Avenue);
- d) The proposed supermarket be relocated to the Ground Floor of Site 4, enabling direct access from the adjacent residential areas to the north, without the need to cross to the south of Buchan Avenue;
- e) Retain a smaller component of retail on Site 5 with the gym, without the need for a large service dock. This will enable for a greater level of integration and active street frontages facing Maxwells Creek;
- f) Establish a three-storey podium across all sites, which is responsive to what will be the character of the adjacent developments already under construction (i.e. Sites 1 and 2 in DA-1245/2022 and the Edmondson Park High School). Proposing L-shaped buildings at the corners of Site 3 with Buchan Avenue, opening the development to the north and improving the level of solar access to apartments and communal open spaces

Transport

Traffic Generation and Impacts

Council recommends that the Transport Impact Assessment (Appendix O) assess the cumulative transport impacts generated by the subject sites in conjunction with other approved developments (including Sites 1 and 2) on the local road network within the Precinct. Detailed traffic distribution and assignment modelling is recommended to be included in the Assessment, together with forecast traffic flows on the surrounding road network.

Parking and Access Arrangements

The SDD Application should include provision of a Parking Management Plan (PMP) to demonstrate:

- Allocation of parking for residential, retail, childcare, co-living and affordable housing uses;
- Shared parking arrangements; and
- Stacked parking configurations.

All access and parking areas are to be designed in accordance with AS 2890. Detailed requirements include:

- i. Provision of appropriate queue lengths between the first point of conflict and site boundaries
- ii. Access designs that minimise pedestrian conflicts on the external road network
- iii. Assessment of the number and location of access points
- iv. Secure resident parking with appropriate access controls and gates
- v. Visitor parking to remain publicly accessible and designed as public parking
- vi. Ramp designs allowing B85 and B99 vehicles to pass safely on two-way ramps
- vii. Provision of appropriate ramp splays
- viii. Determination of loading dock trips using the TfNSW Urban Freight Forecasting Model
- ix. Assessment of separating service vehicle access
- x. Consideration of parcel lockers within loading areas
- xi. Provision of parking for delivery riders and bicycles
- xii. Provision of a minimum 1.5 m wide continuous path between building entries, lifts, and bicycle parking areas, excluding car ramps
- xiii. Provision of appropriate end-of-trip facilities for all land uses (including retail and commercial)

Public Transport and Active Transport

As part of the Transport Study for the adjacent Edmondson Park High School, bus bays have been identified along the northern side of Buchan Avenue.

Collaboration should occur between the DPHI and the Proponent to ensure bus shelters are identified and delivered as part of the SSD and concurrent rezoning proposal. Pedestrian and active transport connections to and from the subject sites and surrounding Precinct are recommended to be clearly identified and incorporated into a Transport Infrastructure Plan.

Car Share

The SSD application should provide ride share opportunities to encourage sustainable transportation opportunities such as a dedicated car share service (e.g. GoGet) to minimise capacity impacts to the local and state road network.

Green Travel Plan

A draft Green Travel Plan is recommended to be submitted to the DPHI and TfNSW for review as part of the SSD Application. The Proponent should confirm with TfNSW whether adopted mode shares for different transport modes outlined in the Transport Impact Assessment Report are appropriate for use in the TIA and the Green Travel Plan.

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 subject sites. Council is concerned that this could compromise safety and response times during peak periods or emergency situations, which should be addressed.

Construction Traffic Management Plan

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 educational facilities. A site-specific Construction Traffic Management Plan (CTMP) is to be developed in consultation with Council and adjacent educational facilities.

Waste Services

The site design must accommodate the dimensions of a Council Heavy Rigid Vehicle (HRV). Associated dimensions of a Council HRV is provided below.

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

Whilst the provided height dimension for the HRV already includes a necessary safety margin, all other dimensions, including length and width, represent the actual size of the vehicle. Therefore, a safety margin must be added to these dimensions to ensure adequate clearance for swept paths, overhead obstructions, and loading dock manoeuvres.

Suitable waste storage facilities are to be provided as part of the Proposal. The garbage/waste storage areas shall be clearly identified on the site plans and be located within the proposed building. The designated garbage/waste storage areas shall comply with the following requirements:

- The rooms shall be fully enclosed and provided with a concrete floor, and with concrete or cement rendered walls coved to the floor;
- The rooms are to be provided with a hose cock for hosing the garbage bin bay and a sewerage drainage point in or adjacent to the bin storage area. The drainage point should have a fine grade drain cover sufficient to prevent coarse pollutants from entering the sewer. If the hose cock is located inside the bin storage bay, it is not to protrude into the space indicated for the placement of bins;
- The rooms 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
- The rooms must include a tight-fitting, self-closing door and mechanical ventilation.

Community Planning

A Plan of Management for the affordable components of the Proposal outlining the operational details of the low-income housing units should be developed.

Environmental Health

Use of Development

Details relating to the construction, fit-out and use of the proposed retail/commercial development including the childcare centre, gym and supermarket are not clearly outlined within the SSD Application. If approval is granted, it is recommended the DPHI impose a condition requiring separate development consent for construction, fit-out and operation of all retail/commercial development including but not limited to the childcare centre, gym and supermarket.

Acoustics

Appropriate conditions shall be imposed in any future consent requiring the Acoustic Consultant's recommendations to be incorporated into the design, construction and operation of the proposed development. It is requested that Conditions of Consent require applications for the Construction Certificate and Occupation Certificate to be supported by certification by a suitably qualified Acoustic Consultant confirming adherence with the approved Acoustic Report and verifying that the development is capable of meeting the design criteria. Furthermore, any future approval shall require mechanical plant to be selected in consultation with a suitably qualified Acoustic Consultant prior to the issue of a Construction Certificate.

Potential construction noise and vibration management shall be addressed by a Condition of Consent requiring a Construction Noise and Vibration Management Plan prepared under the supervision of a suitably qualified Acoustic Consultant to be submitted to the certifier prior to issue of a Construction Certificate. The Construction Noise and Vibration Management Plan may be incorporated into the Construction Environmental Management Plan for the development.

Note: The 'suitably qualified Acoustic Consultant' must be a member of the Australian Acoustical Society or employed by an Association of Australasian Acoustical Consultants (AAAC) member firm.

Other Matters

- The proposed development shall be connected to the reticulated sewerage system.
- If proposed, regulated systems such as cooling water systems must be installed at the premises in accordance with the *Public Health Act 2010*, *Public Health Regulation 2022* and AS 3666.