

18 September 2019

Russell Hand  
Department of Planning, Industry and Environment  
22-23 Bridge Street  
Sydney NSW 2000

Dear Mr. Hand,

**RE: Comment on EIS – Residential Flat Building development at 242-244 Beecroft Rd, Epping (SSD 8784)**

The City of Parramatta Council thanks you for the opportunity to comment on the Environmental Impact Statement for the proposed residential development at 242-244 Beecroft Rd, Epping.

Council previously provided comments on the request for SEARs in 2017 highlighting the issues Epping Town Centre will face. In these comments, Council outlined their concern in progressing this application whilst a review of the Epping Town Centre planning controls was underway. Since this time Stage 1 of the Epping Planning Review has been undertaken which includes the *Epping Town Centre Traffic Study* (EMM, 2018) and the *Epping Town Centre Commercial Floorspace Study* (SGS Economics, 2017). Both these technical studies recognise that a whole of government approach is necessary to address both the loss of commercial floorspace and traffic congestion in Epping Town Centre.

Given that the State Government currently owns this site, there is an important opportunity for this development to help address some of the key issues for Epping.

This letter both summarises the key concerns of Council and provides a more detailed discussion of the issues.

Whilst this response has been prepared by Council staff, it has been circulated to Ward Councillors, who support the contents of the letter.

**Contact us:**

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## Key Concerns

1. Council's traffic study has identified that the provision of a link road through the site connecting Ray and Beecroft Roads will take the pressure off peak hour traffic delays and congestion at key intersections in the long term when coupled with other identified road improvements. Given that funding is being secured for local improvements through the relevant contributions plan and state government funding has been secured for projects such as the widening of the bridge over the railway line, it is essential that this key piece of infrastructure is also secured.
2. The Region and District plans set targets for both housing and jobs. The challenge in Epping is not in meeting the housing targets, which have been achieved ten years ahead of Department of Planning projections, but in delivering jobs. Therefore, Council requests that the application be amended to include additional retail and commercial floorspace of 10,120sqm, equating to a 1:1 FSR of the total new floorspace.

Given the significance of these key concerns and a lack of any meaningful dialogue on how they may be addressed, **Council wishes to formally object** to the current proposal.

## **Background**

### *Epping Planning Review*

Epping Town Centre has experienced unprecedented rates of development since 2014. Most of this development was enabled by the State Government's rezoning of the town centre as an Urban Activation Precinct in 2014.

Development has occurred at a significantly faster rate than anticipated - the NSW Government forecast that 3,750 new dwellings would be built over 22 years, between 2014 and 2036. Information available indicates that about 5,500 new dwellings will have been built (or on track to be built, via lodged development applications) between 2014 and about 2023. This is almost twice the amount of development in a third of the time forecast. Additional development is expected over time, as the planning controls introduced in 2014 allow for a total capacity of 10,000 dwellings within the town centre.

This development has led to a range of significant issues which residents have raised concerns about including traffic congestion, heritage, open space, community infrastructure impacts, and loss of commercial floorspace.

In December 2016, the Epping Planning Review was commenced by the City of Parramatta Council. The scope of the review was to address the unintended consequences of the planning control amendments brought into effect in March 2014 as well as allowing Council to manage current (formal and preliminary) Planning Proposals seeking additional growth within the Town Centre. The Epping Planning Review involved undertaking of technical studies, release of a Discussion Paper and undertaking two phases of community consultation.

The *Epping Town Centre Traffic Study* (EMM, 2018) was completed as part of Stage 1 of the Epping Planning Review, in response to a key concern by residents of traffic impacts of development and existing high levels of congestion. The study also looked to the potential impact of a through link road connecting Ray and Beecroft Roads on the subject site (240-244 Beecroft Road Epping) would make on traffic congestion in Epping Town Centre.

The *Epping Town Centre Commercial Floorspace Study* (SGS Economics, 2017) was also undertaken as part of Stage 1 of the Epping Planning Review. This study aimed to identify the level of commercial (retail, office and business) floorspace required to meet current and future demand within the Epping Town Centre.

Both technical studies, Traffic and Commercial Floorspace, recognise that a whole of government approach is required to address both loss of commercial floorspace and traffic congestion in Epping Town Centre.

#### *Key Council Resolutions – 9 July 2018 and 29 April 2019*

In relation to the subject site, Council has considered the sites potential benefits in terms of provision of commercial floorspace and traffic management. An extract of the relevant Council resolutions are provided below.

As part of consideration of the Epping Traffic Study, Council resolved (part) on 9 July 2018:

*"That Council write to the Minister for Planning, Landcom and the Greater Sydney Commission and request the State Significant Development currently being progressed for 240-244 Beecroft Road be placed on hold until a workshop can be organised involving Council and Landcom to discuss and seek to resolve the following:-*

- (i) to establish whether a new road link can be provided through this site linking Beecroft Road and Ray Road; and*
- (ii) the provision of commercial floorspace on the site being provided at a level no less than 1:1 FSR on this site."*

Following the above resolution, Council staff have had several meetings with Landcom and RMS to discuss the merits of additional commercial floorspace and a link road in the proposal. At these meeting Council staff discussed the justification that underpins the Council request of 9 July 2018 and which is discussed in more detail below.

As part of consideration of matters of traffic and parking within Epping Town Centre, Council resolved (part) on 29 April 2019:

*"That Council request the Lord Mayor write to the Member for Epping requesting an urgent meeting with the Lord Mayor and Epping Ward Councillors about the NSW Government-owned site at 240-244 Beecroft Road, Epping, to discuss opportunities to deliver a new road link and additional commercial floorspace on the site, consistent with the Government's reclassification of Epping in 2018 from a Local Centre to a Strategic Centre."*

Council sent a letter (dated 3 June 2019) to the Member for Epping, Hon. Dominic Perrottet MP, expressing concerns with the subject proposal. The Member for Epping has subsequently written to the Minister for Planning (letter dated 28 August 2019) in relation to this application supporting the provision of a new link road and additional commercial floorspace in line with Council's resolved position.

## *Draft Local Strategic Planning Statement and Local Housing Strategy*

Supporting Epping as a vibrant town centre by providing employment opportunities through the provision of commercial floorspace is consistent with Council's recently adopted Draft Local Strategic Planning Strategy (LSPS) and the Local Housing Strategy (LHS).

Council resolved on 9 September 2019 to place the City of Parramatta Draft LSPS and the LHS on public exhibition. Both plans must align with the Greater Sydney Commission's Central City District Plan (2018) and are requirements under Part 3 of the *Environmental Planning and Assessment Act 1979*. Specifically the LSPS is Council's 20 year vision for land use and infrastructure in the City of Parramatta, and the LHS provides direction on where and when future housing growth will occur within the City of Parramatta.

One of the 'Productivity Priorities' of the Draft LSPS is to "monitor commercial floorspace in the Parramatta CBD, Westmead, Olympic Park and Epping Centres" and review policies accordingly. The Draft LHS responds to a key District Plan Action to "continue the review of planning controls for the Epping Town Centre in collaboration with State Agencies" by "*encourag[ing] Planning Proposals that prioritise delivery of commercial development to achieve the target of 7,000 to 7,500 jobs in Epping by 2036.*"

### **Provision of a Link Road between Beecroft Road and Ray Road**

The need to investigate traffic issues as part of the Epping Planning Review project was determined to specifically test the traffic implication of the higher than anticipated growth and assess the likely traffic benefits of various local and state improvement works.

Council officers engaged independent specialist traffic consultants, EMM Consulting, to prepare the Traffic Study. It included the development of a sophisticated traffic model, prepared with input from the NSW Roads and Maritime Services (RMS). The Traffic Study is over three reports, and the relevant report (to this application) is named "East West Link and Bus Tunnel Options Report ('Link/Tunnel Report'), dated 19 June 2018" and available at <https://bit.ly/2BwqsgC>.

The Traffic Study assessed the likely traffic benefits provided by potential local and State road improvement works. It did this for two growth scenarios: a 2026 growth scenario based on 5,000 new dwellings compared to a 2017 base year, and a 2036 growth scenario based on 10,000 new dwellings. A total of 13 works were modelled comprising three local works and 10 State works, including a new east-west link within the subject site.

The new east-west link has been identified to improve traffic capacity, in particular in the year 2036 road network. However, further additional traffic capacity improvements also need to be identified and examined for the Carlingford Road/Beecroft Road and Epping Road/Blaxland Road intersections in order for the Council proposed road improvements to achieve improvements in local traffic movement in 2026 and 2036. In short, the Traffic Study concluded that the proposed link road would reduce peak-hour traffic delays and congestion at key intersections in the long term, when coupled with other identified road improvements.

A whole-of-Government approach is required to alleviate the worsening traffic congestion in Epping Town Centre as a result of the rate of growth. Council has initiated a series of actions to assist in delivering local traffic works and also advocating for the NSW Government to undertake certain road improvement works, including the subject site. Therefore the City of Parramatta recommends the subject application be redesigned to include a link road through the site connecting Ray and Beecroft Roads.

It also recommended that the Traffic and Transport Impact Assessment (SCT Consulting, June 2018) as submitted as part of the SSD application be revised to respond to the findings of the Epping Traffic Study in relation to providing a through site link connecting Beecroft and Ray Roads.

### **Provision of Commercial Floorspace**

The subject application proposes 39,000sqm of residential GFA (approximately 442 residential units) and 700sqm of non-residential uses, equating to a total FSR of 3.8:1. It is noted that non-residential uses will be provided on the ground floor, include neighbourhood shops, cafes, gymnasium, etc., and will be determined in future development applications for the site. The non-residential floorspace currently equates to 0.06:1 of the total FSR. Council believes the subject NSW Government proposal has the opportunity to provide additional retail and commercial floorspace of 10,120sqm, equating to 1:1 FSR of the total floorspace. This is supported by technical work undertaken as part of the Epping Planning Review.

As part of the Epping Planning Review, the City of Parramatta commissioned SGS Economics and Planning to undertake a *Commercial Floorspace Study* for the Epping Town Centre (2017) to understand whether the loss of commercial floorspace is a positive trend, and to understand other commercial land use elements that may create a more successful town centre. The Study is available at <https://bit.ly/2BwqsgC>.

Key findings of the Study include:

- Between 2011 and 2017, approximately 25,000sqm of commercial floorspace has been demolished in Epping, leaving approximately 30,000sqm of office floorspace. In addition there are several stand alone commercial buildings that have high vacancies and are subject to development applications for residential or have been rezoned residential.
- The NSW Government Priority Precinct process has prioritised residential development in the Epping Town Centre, indicating the demand for office floorspace is likely to be redirected to other nearby employment centres, which may limit the town centre as a potential commercial and retail centre.
- Epping Town Centre is an accessible location, and has attractive jobs in industries that do not rely on local populations, such as knowledge intensive jobs in professional services.
- Epping continues to experience demand for retail and office floorspace, however development activity has seen commercial uses unable to access appropriate floorspace to support their businesses.

In light of this demand, the Study concluded that forecast population, the size and infrastructure investment in the town centre, that Epping could play a more significant role than other nearby local centres. Over the next 20 years (to 2036) there is forecast demand for 13,000sqm of retail floorspace and 55,616sqm of office floorspace in the Epping Town Centre.

However current patterns of development are unlikely to deliver the quantum of floorspace required by 2036. Therefore the report recommended that a minimum non-residential floorspace ratio be implemented as a means to deliver commercial floorspace. Council are currently investigating the different mechanisms to achieve this objective.

Section 6.2 of the SSD's Environmental Impact Statement (July 2019) assesses proposed alternatives, including 'development for other land uses not currently permissible' and cites three arguments for not providing additional commercial floorspace as part of the redevelopment:

1. The size of the site, its location and access constraints is unlikely to attract prospective tenants or deliver high quality commercial or business premises outcomes
2. Commercial uses will provide for more traffic congestion in and around Epping Town Centre
3. Contrary to the sites rezoning to R4 High Density Residential in 2014 and the strategic planning priorities outlined in the Sydney Region Plan and District Plan.

In response to the proponent's arguments, Council officers put forward that:

1. **The size, location and access of the site is ideal for commercial uses** – As stated in the EIS the site is "strategically located 300 metres from Epping Town Centre and Epping Railway Station and Northwest Metro and bus services". It is also located on a major road and has two road access points. The EIS also states the site was previously occupied by three commercial office building (one building still stands). Further, the site is large in scale and can make a unique offering by providing large floorplate commercial. The commercial floorspace could be accommodated in the podium of the development, with residential tower above. Large floorplate commercial is an important part of making a town centre commercially vibrant and diverse. Epping's poor offering of large floorplate commercial is identified as a disadvantage in the *Commercial Floorspace Study*.
2. **A balance between traffic impacts and provision of commercial uses should be considered.** It is acknowledged that associated traffic impacts from commercial land uses (retail and office premises) may well be greater than those associated with residential development. This is because commercial uses tend to generate a greater number of trips per square metre of floor area. Council are currently undertaking further traffic modelling to quantify the impact of any additional commercial floorspace in the town centre. However it may be necessary in this case to allow additional development to resolve a planning issue not related solely to housing delivery, rather to protect the amenity and economic viability of a town centre. In this case allowing additional density that may detrimentally impact on traffic outcomes should be considered.

3. **The provision of commercial floorspace with Epping Town Centre is consistent with the Region and District Plans.** In the Greater Sydney Commission's final *Central City District Plan* (District Plan) and its metro-wide level plan *Greater Sydney Region Plan - A Metropolis of Three Cities* (March 2018) Epping is identified as a 'Strategic Centre' for 2036. The role of the Epping Town Centre was elevated to a higher-order centre in these plans (from a 'Town' or 'Local Centre'). The District Plan establishes jobs targets for lower and higher scenarios for 2036 for Epping of 1,900 additional jobs (2036 baseline) to 2,400 additional jobs (2036 higher target). These are on top of the 5,100 jobs that the District Plan sees as the baseline for 2016. With loss of commercial floorspace currently occurring in Epping Town, it is considered critical for sites, such as the subject site, to provide job-generating floorspace in order for Epping to realise its role as a Strategic Centre.

Further, the *Commercial Floorspace Study* identified the subject site as one of a few Government-owned sites be used as part of a deliberate strategy to support the Government's 30-minute city strategy by providing commercial floorspace to offset the loss when other sites are developed and providing floorspace to allow businesses that are displaced when their existing building is being redeveloped to relocate within the centre.

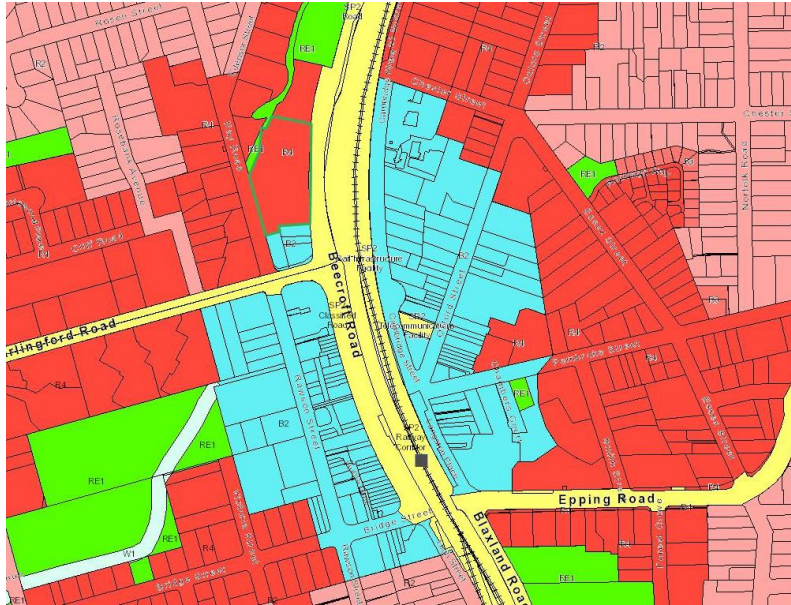
In 2014 when the current planning controls were put in place a projection of 3750 dwellings by 2036 was published as the housing target being used to justify the new controls. The Department of Planning revised this target to 5500 dwellings by 2036 in 2017 as the housing growth possible under the new planning controls is approximately 10,000 dwellings.

Since 2014 Epping has experienced significant housing growth. Based on approvals already granted and development applications under assessment it is likely that the housing target could be achieved by 2023, thirteen years ahead of the Department of Planning projection of 2036.

The Region and District Plans set targets for both housing and jobs. The challenge in Epping is not to respond to the housing targets. These targets have been achieved ten years ahead of Department of Planning projections. The significant challenge in meeting the objectives in the Regional and District plans is to deliver jobs in the Epping Town Centre. Therefore, the delivery of commercial floorspace on this site as requested by council is consistent with the relevant regional and district plan.

4. **Additional commercial floorspace can be provided as part of the SSD.** It is acknowledged that the site's current zoning of R4 High Density Residential under the *Hornsby LEP 2013* does not require any commercial floorspace however, a neighbourhood shop use is permissible within the zone. It is noted that the site's previous zone (B4 Mixed Use) prior to 2014 would have allowed additional commercial floorspace and that the site accommodated three office buildings for over 30 years. It is one of the few sites within 300 metres of the Epping Railway Station that is not zoned B2 Local Centre (refer **Figure 1** below). Division 4.38 State Significant Development of the *Environmental Planning and Assessment Act 1979*, provides that development consent may be granted for a SSD application despite the development being partly prohibited by an environmental planning instrument.





**Figure 1:** Current Land Use Zoning for Epping Town Centre (Subject Site outlined in green)

### Car Parking Rates

The proposal provides car parking rates in accordance with the RMS' Guide to Traffic Generating Developments (2002) which are higher than the recently updated parking rates in the Hornsby Development Control Plan (DCP) 2013. The application proposes 356 car parking spaces, including 298 residential spaces and 45 visitors' spaces.

As part of the Epping Planning Review and Traffic Study, it was found that traffic congestion is due in part to the significant residential flat building development that has occurred. As part of a suite of policy and infrastructure responses to the issues of traffic congestion, Council resolved to reduce parking rates for certain development within the Epping Town Centre.

Although SSD applications do not have to consider DCPs, it is considered pertinent in this case to adhere to recent policy changes to assist with reducing the traffic impact of future development within the Epping Town Centre. Therefore the subject application should be amended to be consistent with the Hornsby DCP 2013 as follows:

- Provide maximum 297 residential parking spaces and minimum 64 visitor parking spaces.
- Off-street parking for the non-residential component of the proposed development is to be provided in accordance with the Table 1C.2.1(e) of the Hornsby DCP 2013.
- Adequate bicycle parking, motorcycle parking and car share parking spaces is to be provided in accordance with the Hornsby DCP 2013.
- A Green Travel Plan is to be provided.



## Development Contributions

It is noted in the EIS (refer pg. 99) that this is a concept development application and, that on applications relating to future detailed development there is a commitment to paying development contributions in accordance with Council's relevant development contributions plan. The City is supportive of this commitment, as the Government rezoning of Epping Town Centre in 2014 has resulted in significant development that has generated significant local infrastructure demand.

## Urban Design:

### Circulation:

- A 3m wide 24/7 pedestrian connection link between Ray Road and Beecroft Road is required as per the Hornsby DCP.
- Council previously commented on the accessibility of the proposed pedestrian link. The proposed link is not clearly identified and appears to only be accessible by stairs.
- Access to buildings: It is not clear how pedestrians, visitors and delivery people access each building from Ray Road or Beecroft Road.
- The pedestrian link and building lobbies are to have compliant accessible entries and paths of travel with a direct line of sight.

### Side Setback to the north:

- The proposed setback to the north is only 6m, the ADG states that for an RFB of this height a minimum side setback of 12m is required. This ensures internal amenity and appropriate building separation. The lot to the north is zoned R4 and therefore a 6m side setback would compromise a future RFB development on this site.

### Car park entries:

- The slip road on Beecroft Road narrows the footpath and restricts access into the two lobbies on Beecroft Road.

### Lifts to Roof:

- It is recommended that at least one lift continue to the roof rather than providing a separate lift from the fifteenth floor.

### Diagonal columns:

- The junction where diagonal columns and the ground meet is problematic due to the angle of the columns. The diagonal columns are to be replaced with vertical columns.

### Residential Design Guide:

- The development should comply with all aspects of the ADG to ensure adequate internal amenity for residents.

### Public Domain:

- Large street trees cannot be planted along Beecroft Road as it is a 60km speed RMS road. Large trees should be planted in the front setback at 8-10m intervals, this will provide shade and comfort to pedestrians and good public amenity. Recommended species is *Lophostemon confertus*. Soil volumes to be provided as per the Parramatta Public Domain Guidelines 2017 (PDG) for street trees.
- Street furniture as per the PDG should be provided as required.
- Pavement from the property boundary to kerb should be in-situ concrete, the full width of the pavement.

### Setbacks & Deep Soil:

- The current setbacks do not conform with the required, as follows: Front (7m), rear (7m) and sides (6m).

### Private Landscape:

- Area calculations are to be shown for all areas, e.g. communal spaces etc.
- Communal space at ground must meet the requirements of the Hornsby DCP
- Driveways should be a maximum of 6m wide.
- A 2m landscape buffer is required to flank the driveway.
- Retention of existing tree: Applicant needs to demonstrate that the proposed development does not impinge on Tree Protection Zone requirements for significant existing trees.
- In accordance with Council's aspiration to facilitate development in a way that provides for mature tree vegetation and natural shade in the LGA, the applicant is required to provide trees at a rate of 1/80m<sup>2</sup> of landscape area (additional to any existing trees to be retained). The trees must be species capable of reaching a mature height of more than 13m (min dimension 4x4m). The applicant needs to demonstrate that the trees can be planted more than 3m away from any proposed built structure. These trees should be planted in all the setbacks and the landscape areas.
- In accordance with the above objective, the location of facilities in the front setback is to be minimised. Bin enclosures are to be located in the basement car park and are not permitted in the front setback. Walls, fences and other structures in the front setback are to be minimised. Booster valves and substations are to be very carefully designed and located so they are not visually obtrusive and do not obstruct opportunity for planting large trees.
- Ensure community open space is contiguous with deep soil where possible.

Public domain comments must be incorporated in the next set of drawings submitted.

Amended drawings should include:

1. Public Domain Alignment Drawings showing existing and proposed levels for roads, kerb and gutter, footways, forecourts and through-site links. The drawings should clearly show positive drainage away from the building and

interfaces of the public domain and new building entries via a series of engineering cross and long sections, along with a preliminary public domain plan showing proposed general layout of elements, services and finishes. All drawings to be prepared in accordance with the requirements outlined in Chapter 2 of the Public Domain Guidelines (ref:

<https://www.cityofparramatta.nsw.gov.au/business-development/public-domain-guidelines>).

2. Landscape drawings for internal site areas showing all proposed boundary treatments and compliant private and communal open space areas.

### Universal Access

- Applicant must provide alignment drawings of all accessible entries showing smooth low-level access points at the abutment of differing surfaces.
- Ensure the footpath along Beecroft Road extends the full length of the property boundary to allow a person to traverse the full length of the property boundary and access the residential lobby on the northern side of the Beecroft Rd entry driveway. (see comments above)
- The residential access from Ray Road must include access to the P1 level lift.
- Public stairs and ramps leading from the footpaths to the ground floor level require handrails to both sides of the stair flights and ramp sides.
- The common open space areas require inclusive equipment and features including seating, BBQs etc. Updated documents must show how these will be accommodated.

### Social Outcomes

#### Affordable housing:

Council recommends that a condition of consent include a mandate that a minimum of 5% of dwellings be dedicated to Council as affordable rental dwellings in accordance with the following requirements:

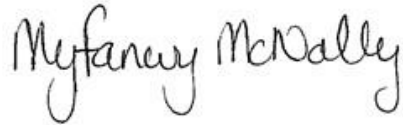
- That the mix of dwellings dedicated to Council be representative of the proportion of studio, 1, 2, and 3 bedroom units provided throughout the development.
- That the dwellings be constructed and fitted out, ready for occupation by a tenant.

Environmentally Sustainable Development

Improved commitments are needed in relation to, on-site renewable energy, BASIX energy, Electric Vehicle charging and UHI.

If you have any queries please do not hesitate to contact the officer listed above.

Yours sincerely,

A handwritten signature in black ink that reads "Myfanwy McNally". The script is cursive and fluid, with the first name "Myfanwy" and the surname "McNally" clearly legible.

Myfanwy McNally  
City Significant Development, Manager