



Mr Russell Hand
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Attention: Russell Hand,
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Your Reference SSD-68708456 & SSD-68939460
Our Reference NCA/13/2024
Contact Bianca Lewis
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15 October 2024

Dear Mr Hand

City of Parramatta Council submission to 242-244 Beecroft Road Epping – Amending Detailed Design and Amending Concept State Significant Development Applications

I refer to the above applications and the request from NSW Department of Planning, Housing and Infrastructure (DPHI) to provide advice on the Amending Concept and Detailed Design Applications.

The proposed amendments result in a substantial increase in residential gross floor area, building heights and number of residential units (from 374 to 479 units). Council objects to both the applications to increase density on the site based on parking and traffic generation grounds. In addition, the amending detailed design application should be amended in relation to tree, landscaping and waste servicing matters.

It is noted Council Officers have outstanding concerns relating to the further reduction of commercial floor space and built form issues (building height, building separation and setbacks). Whilst these concerns remain, it is acknowledged that the Independent Planning Commission (IPC) have ruled specifically on these matters in relation to the previous relevant applications (ref: SSD 8784 and 31576972) on 19 September 2023.

Council's detailed submission is provided in **Attachment A**. Please note this response has been prepared by Council staff and have not been endorsed by Council.

Council appreciates the opportunity to comment on the above applications. Should you wish to discuss the matters raised, please contact Bianca Lewis, Executive Planner on 9806 5531 or at blewis@cityofparramatta.nsw.gov.au.

Regards

Myfanwy McNally
Manager, City Significant Development

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Attachment A: Detailed Submission

1. Traffic and Transport

The proposed modification application is not supported on parking and traffic generation grounds due to the existing high levels of traffic congestion at the intersections of Carlingford Road with Beecroft Road and at Rawson Street, Ray Road and Carlingford Road. It should be noted that there is further unrealised development currently zoned for the Epping Town Centre that would also worsen the already poor conditions.

The following detailed comments is provided below.

Traffic Generation

The submitted Transport Impact Assessment (JMT Consulting, 2 July 2024) states that the proposed modification application will result in an additional 8 vehicle trips in the AM peak hour and 6 vehicle trips in the PM peak hour. The report then concludes that this increase will have a negligible impact on traffic and would not register any difference in traffic modelling programs in with or without development scenarios. The TIA further states that the traffic generation by the proposed development is less than the historic traffic generation for the site which has previously been occupied by the Epping Office Park and the Sydney Metro construction works depot.

Council Officers do not accept that the proposed development will only result in an additional 8 and 6 vehicle trips in the AM and PM peak hours respectively on the basis that the factors that determine trip generation are complex and dependent on a number of factors, including the number of on-site parking. As the site is now proposing 105 more parking spaces than what was previously approved, the use of private vehicles will become a more attractive mode share and counter efforts to promote sustainable transport options. This will result in a higher trip generation rate (refer comments in 'Parking' for further discussion).

As noted above, the intersections of Rawson Street, Ray Road and Carlingford Road, as well as Carlingford Road and Beecroft Road experience high levels of congestion. At the Rawson Street and Ray Road intersection, there is not dedicated right turn phase for both roads meaning right turning traffic in Rawson Street must give way to traffic in Ray Road. Furthermore, there is limited storage space in Carlingford Road leading up to Beecroft Road meaning. As a result of this, Council has observed significant delays and long queues in Rawson Street which is a cause of community frustration. Any increase in traffic movements in Ray Road will have impact on the performance and safe operation of this intersection and further increase the delays.

The applicant's Traffic Generation assessment is limited to weekday peak hours, however, it is noted that the surrounding area is heavily congested on Saturdays with extensive queues and delays experienced in Rawson Street for the above stated reasons. As a result, the development will have a significantly greater traffic impact than the previous commercial use of the site outside the weekday peak periods.

It is to be noted that while the applicant has not provided any traffic modelling to support the modification application, modelling undertaken as part of the Epping Bridge Project currently on-exhibition indicates that the intersection of Ray Road, Rawson Street and Carlingford Road is

performing at a Level of Service F and this will not change post bridge upgrade. The accumulation of all these reasons means that the site cannot accommodate any further intensification and the modification application should be refused.

Parking

In accordance with the SEPP (Housing) 2021, the development is required to provide the following number of parking spaces:

Development Type	Parking rates	Proposed Development
Residential Non-Affordable	SEPP (Housing) 2021 – Clause 19(f) 1 bedroom – 0.5 parking space 2 bedroom – 1 parking spaces 3 bedrooms -1.5 parking space	1 bedroom = 0.5 x 73 = 37 2 bedroom = 1 x 183 = 183 3 bedroom = 1.5 x 142 = 213
Residential Affordable Housing	SEPP (Housing) 2021 – Clause 19(e) 1 bedroom – 0.4 parking space 2 bedroom – 0.5 parking spaces 3 bedrooms -0 1 parking space	1 bedroom = 0.4 x 21 = 8 2 bedroom = 0.5 x 55 = 28 3 bedroom = 1 x 5 = 5
Total Residential		<u>Minimum 473 spaces</u>
Commercial	1 space per 70sqm	<u>823/7 = 11.75</u> <u>Maximum 12 spaces</u>

The applicants TIA provides the following justification for higher parking:

- a) Analysis of the data following the completion of the Epping to Chatswood train line has revealed that car ownership within the area has remained relatively consistent however, the mode share in commuter peak times has increased for public transport.
- b) The site is located near Epping Station which provides frequent and fast services.
- c) A reduced off-street parking provision will increase parking demand on-street. This in turn may cause residents circulating the surrounding roads looking for parking and adding to congestion in the area.

The above justifications are not supported by Council Officers for the following reasons:

- a) While the analysis of mode share within the area may show that the mode share for public transport has increased, this only shows that by providing better access to public transport, more people will be inclined to using this. The analysis by the applicant does not provide any information on the links with lower car ownership and mode share or lack thereof. Accordingly, this should not be relied on as a justification to permit an access number of parking spaces on the site.

It should be noted that traffic congestion in the area is not limited to the standard commuter peak times as there is significant congestion during weekends. Furthermore, it is noted that the data for the sites provided by the applicant generally had a rate of close to 1 space per dwelling. Applying the PDCP 2023 rates would result in a much lower rate with many dwellings not being allocated any parking spaces. As such, residents of those dwelling would be forced to rely on alternative transport options and therefore, this would surely lead to a lower traffic generation rate.

In order for the parking rate data to be relevant, the sites that are surveyed should have substantially lower parking rates and consideration would need to be given to the number of dwellings with no parking allocated, the number of dwellings with one parking space, and the number of dwellings with more than one parking space and how this influences mode choice.

- b) It is acknowledged that the site is within 400 metres of fast and frequent public transport services, buses, Metro and heavy rail. As a result, it is considered that the area can support residents only relying on public transport.
- c) Off-street parking is limited and is unlikely to be available to the vast majority of residents. While some residents may be able to find parking spaces, most will not. Furthermore, Council may decide to install parking restrictions in the surrounding streets subject to approval through the Traffic Committee process. Accordingly, the availability of on-street parking should not be considered in determining the appropriate parking rate for the site. In order to limit the proposed developments impact on on-street parking and to ensure availability for short stay to support retail and commercial uses, it is recommended that a condition be included in any approval for the applicant to apply to Council to install all day timed parking restrictions at the development frontage in Ray Road for the review and approval of the Parramatta Traffic Committee with all signs to be installed at no cost to Council.

Given the above, the excessive parking proposed by the applicant cannot be supported as this will have an adverse impact on traffic within the surrounding area. Furthermore, approval of this application may undermine the development controls applicable within the precinct and may set a precedent that other applicants use to justify excessive parking.

Section 4.15(2) of the *Environmental Planning and Assessment Act 1979* permit consent authorities to enforce a condition on non-discretionary standards, such as parking rates, that are less onerous than the standard. Accordingly, reference is made to the Parramatta DCP 2023 that is currently applicable to the site, which are consistent with the Hornsby DCP 2013 rates previously relied upon during the original assessment. An application of these rates would yield the following parking requirements:

Development Type	Parking rates – PDCP 2023 (Table 8.1.1.2)	Proposed Development
Residential Non-Affordable (Max)	Studio/1 bedroom = 0.4 2 bedroom = 0.7 3+ bedroom = 1.2	1 bedroom = 0.4 x 94 = 37.6 2 bedroom = 0.7 x 238 = 166.6

Development Type	Parking rates – PDCP 2023 (Table 8.1.1.2)	Proposed Development
		3 bedroom = 1.2 x 147 = 176.4 Maximum 381 spaces.
Residential Visitor	1 space per 7 dwellings	479/7 Minimum of 69 spaces.

Council Officers contend that the development proposes 92 more residential parking spaces than what is permissible for this site. Should the application be approved, conditions should be imposed to ensure that the maximum number of parking spaces are in line with the PDCP 2023 rates and the provision for visitor parking.

Furthermore, if in the event an approval is granted, a condition should be placed which ensures, prior to Occupation Certificate that the applicant install timed parking, at their expense, for timed parking restrictions in Ray Road at the frontage of the development site. It is noted that the application to install timed parking, for consideration by the Parramatta Traffic Committee under Delegated Authority and Council's approval.

Loading and Servicing

The number of Loading bays is unchanged with 1 MRV bay, 1 SRV bay and 2 B99 bays for deliveries and service vehicles. These are considered sufficient for the proposed development. However, the updated plans now show additional columns within the loading bays which is obstructing access to the MRV space. The applicant must revise the swept paths or alter the basement layout to ensure safe access to the site.

Sight Lines to Pedestrians

Sight lines to pedestrians has not been shown on the submitted plans in accordance with the minimum requirements specified in Figure 3.3 of AS 2890.1-2004 (a splay extending 2 metres from the driveway edge along the front boundary and 2.5m from the boundary along the driveway). It is recommended that a condition be imposed to require the applicant to provide amended plans prior to the issue of a construction certificate to demonstrate that sight lines to pedestrians are provided in accordance with the requirements of the Australian Standard AS 2890.1-2004.

Construction Traffic Management Plan (CTMP)

Should the application be approved, it is recommended that a condition be imposed to require the applicant to submit a Construction Traffic and Pedestrian Management Plan (prior to the commencement of the building works) to the satisfaction of Council.

Bicycle Parking

The development proposes a total of 531 bicycle parking spaces which complies with the DCP requirements. A condition for bicycle parking should be included with any consent.

2. Landscape

Existing Trees

The Arboricultural Impact Assessment Report (prepared by Rain Tree Consulting, 13 July 2022) and Landscape Plans (prepared by Site Image) show several trees along the southern boundary (T8 a significant Tallowwood (*Eucalyptus microcorys*) and T3 a row of 10 x Bush Cherry (*Syzygium australe*) to be retained. The submitted landscape and civil plans are not coordinated and the civil plans show this area to the south, below the trees, to be excavated 0.5m – 1.0m which is incorrect and not supported. It is recommended the Civil plans are amended to show no cut or fill below these trees (T3 & T8) and to show the location of the existing retaining wall. A landscape section through this southern interface showing the existing retaining wall, trees, and proposed landscaping to the north (including the boardwalk) is to be provided. The section details are recommended to reference the Arborists tree protection and management comments in Section 1.4.3 of the Arboricultural Impact Assessment Report.

There are several public trees located adjacent to the northern boundary, along Devlin's Creek, which will be impacted by the works. These trees will have a major encroachment into their tree protection zones (TPZ's) specifically trees T32, T33 and T34. This level of encroachment is not supported by Council Officers. It is recommended the demolition plan and civil cut and fill plans are modified to ensure the level of encroachment is minimised to an acceptable level (less than 10% as per the AS4970-2009 *Protection of trees on development sites*). The civil plans are recommended to reference the Project Arborists recommendations to minimise works (excavation) within the TPZ's of the neighbouring trees T32, T33 & T34.

It is recommended in the event a consent is issued, conditions are placed requiring a Tree Protection Plan be prepared by an AQF Level 5 Consulting Arborist and the recommended tree protection measures listed by the Project Arborist adhered to, to ensure trees T3 and T8 within the site, the public trees T32, T33, T34 and neighbouring tree T10 are all adequately protected throughout all stages of the works.

The remaining 34 trees on the site are exempt or low value and are supported for removal. It is noted that no street trees will be impacted by the works. Council Officers note that replacement trees are shown within the proposal at a rate of 3.15/80m² which exceeds the Parramatta DCP requirements of 1/80m².

Soil Volume on structure

The design is showing many large specimen trees within the podium / communal open spaces and along the through-sitelink. Several sections through these areas show some adequate soil depth and volume, but in many other locations the soil volume appears limited. In addition, there are several isolated 'island' planters that appear to be disconnected from the surrounding landscaped areas. If the soil volume is limited it will affect the tree(s) development, health and condition over time.

It is recommended the soil volume across all podium areas is reviewed and any isolated planting areas, including tree pits and island planters, are connected below the paving level (contiguous) with the adjacent landscape areas to ensure each planting bed will meet the prescribed soil volume

as per the soil on structure Part 4 ADG requirements to support the mature growth of the trees and ensure they thrive and not just survive within all of the landscaped areas.

It is recommended to achieve this either structural soil and/or modular cells are installed below the paving areas, and in any slab-set downs, where possible.

Furthermore, where there are planters' side-by-side and terraces divided by retaining walls, 'letterbox' openings are added within the lower part of the planter retaining walls to enable the soil and root zones be connected between the adjacent landscape areas.

Where the soil volume cannot be increased, it is recommended some of the tree numbers are to be reduced slightly or smaller, medium-sized species selected instead that will thrive in this environment.

Planting Palette

The Connecting with County native planting palette is supported and encouraged, however there are a few weed species and vigorous plants which are recommended to be replaced with suitable, alternative species, for example:

- *Chlorophytum comosum* (Spider Plant) - origin Soth & West Africa is a minor environmental weed in NSW and is to be replaced with a suitable, strappy leaved native species.
- *Russelia equisetiformis* (Fire cracker) – origin Mexico – is a noxious weed in many parts of NSW and several states across Australia. This is to be replaced with a suitable, alternative, native trailing shrub.
- *Clematis aristata* (Australian Clematis / Old Mans Beard) is a vigorous native, capable of smothering everything around it. This should be replaced with a suitable alternative climber. (Note the quantity ratio of 23 plants / 5m is very high and should be reduced accordingly to suit the replacement climber)
- It is recommended the planting ratio for the matrix plants xx / 5m² is to be reviewed and adjusted accordingly as there appears to be too many plants per 5m² grid.

Through Site Link

The landscape design of the through site-link has improved from the previous approved scheme. However, Council Officer's request that minor amendments to the Beecroft Road entry be considered. The current alignment of the ramps, stairs and retaining walls obstruct clear sightlines. The visual connection is interrupted at the point where there is a network of ramps. A solution could be to create a clear, wide path of at least 3 metres with steps, therefore creating unobstructed lines of sight.

3. Waste Servicing

The submitted Operational Waste Management Plan (Elephants Foot, 5 June 2024) indicates that Council will be responsible for residential waste collection. A residential development of this size requires waste collection with a Heavy Rigid Vehicle (HRV). The Plan indicates that the development will be accessed with a HRV using a turntable. The Traffic Impact Assessment and Architectural Plans submitted only provide vehicle swept paths for Small and Medium Rigid Vehicles.

As per the development controls (refer Appendix 2) of the Parramatta DCP 2023, Council does not support the current arrangement as:

- the development has not demonstrated that it allows for a Heavy Rigid Vehicle to enter and exit the site in a forward direction and to adequately manoeuvre once onsite, without the use of a turntable.
- the development has not demonstrated that it allows the route of travel for the waste vehicle is to be of sufficient strength and quality to support a Heavy Rigid Vehicle;
- the development has not demonstrated that the grades of entry and exit ramps and manoeuvrability (including turning circles) are not to exceed the capabilities of the waste collection vehicle and are to comply with Australian Standard AS 2890.2 Parking Facilities: Off-Street Commercial Vehicle Facilities; and
- the development has not demonstrated that it allows minimum height of the entry and vehicle route of travel is to be 4.5 metres to allow clearance for waste collection vehicles.

Council Officers therefore recommends that the requirements of Appendix 2, PDCP 2023 requirements be addressed.

4. Affordable Housing

Council's current policies supports increasing the supply of affordable housing and is supportive of the provision of 81 units within the development. Council also supports the requirement that the proposed and approved affordable housing units, as per Condition B38, remain for a minimum of 15 years. Furthermore, the provision of affordable housing with a diverse dwelling mix in the development is supported.

It is noted that there is a discrepancy between the number of affordable housing units identified in the Social Impact Assessment (72 units) and the Environmental Impact Statement (81 units) which should be clarified.