



**Sydney Metro Northwest Places Program
242-244 Beecroft Road, Epping
SSD 8784**

Response to Submissions Report

November 2019

Executive Summary

Overview

Sydney Metro is Australia's biggest public transport project. As a new standalone railway, this 21st century network will revolutionise the way Sydney travels.

Sydney Metro Northwest (SMNW), formerly the North West Rail Link, commenced passenger services in May 2019 between Tallawong/Rouse Hill and Chatswood. The project was delivered on time and \$1 billion under budget.

Metro rail will extend under Sydney Harbour, through new underground stations in the CBD and beyond to the south west by 2024.

New metro rail will also link the Sydney city centre with Greater Parramatta, and service Greater Western Sydney and the Western Sydney International Airport.

SMNW has eight new metro stations and five upgraded stations, including an upgraded Epping Station linking Sydney's North West with Macquarie Park, Chatswood, North Sydney and the Sydney CBD. The project provides a catalyst for urban renewal along the corridor, providing connections to areas that will be transformed through both NSW Government and private investment.

NSW Government owned land surrounding the Sydney Metro Northwest stations includes land that is no longer required to support construction or operation. These sites are being made available for development that supports NSW Government priorities of housing affordability, local infrastructure delivery and economic development.

Through the Sydney Metro Northwest Places Program, Landcom is the master developer for government owned land around new Sydney Metro Northwest stations. As the master developer, Landcom will lead studies to support planning for project sites, work with local councils, Department of Planning, Industry and Environment, other government agencies, local businesses and communities to shape plans for projects.

Landcom will appoint private sector development partners to deliver projects across the program.

This Response to Submissions (RtS) report addresses the submissions received in response to the exhibition of the Environmental Impact Statement (EIS) for the Concept State Significant Development Application (SSD application). The Concept SSD application seeks approval for development of government owned land located at 242-244 Beecroft Road Epping. This RtS Report has been prepared to satisfy the provisions of Section 4.39 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and Section 85A of the *Environmental Planning and Assessment Regulation* (EP&A Regulation).

The project

The concept proposal sets out the vision, planning and development framework that will form the basis for assessment of all future development on the site. The concept proposal has been refined in response to submissions received from public authorities and the public during the exhibition period of the EIS.

The concept proposal now seeks approval for the following:

- future residential flat buildings, comprising three towers connected by two podium structures
- an indicative building envelope with a maximum building height to 48 metres (approximately 15 storeys)
- a residential yield of approximately 432 dwellings (including a minimum 5% dedicated to Affordable Housing)
- a maximum residential gross floor area (GFA) of around 37,700m²
- a maximum non-residential GFA of 752m²
- approximately 332 basement car parking spaces
- loading, vehicular and pedestrian access arrangements
- communal and private open space areas and through-site pedestrian link.

Section 7 provides further detailed description of the proposal changes and a comparison of the preferred project to the exhibited project.

Project objectives

The objectives for the concept proposal are to:

- support the NSW Government's challenge to accommodate population growth close to transport centres
- provide diverse housing opportunities
- contribute to liveability by providing housing diversity and Affordable Housing in a highly accessible centre
- link future residents to new job opportunities along the Global Economic Corridor
- develop government owned land to support local economic growth
- support a positive shift in travel behaviour as a result of encouraging active transport use.

Consultation on the EIS

The EIS was placed on public exhibition by the Department of Planning, Industry and Environment (DPIE) for 28 days from 8 August 2019 to 4 September 2019. During the exhibition period, interested stakeholders and members of the public were able to:

- view the EIS online on the DPIE's Major Projects website
- view the EIS in person at:
 - City of Parramatta Council's (Council) offices at 126 Church Street, Parramatta
 - the DPIE's Information Centre at 320 Pitt Street, Sydney
 - the Epping Branch Library at Chambers Court, Epping
- make a written submission to the DPIE

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- attend the drop-in community information session facilitated by the Sydney Metro Northwest Places (SMNWP) project team at the Epping Club, Epping on 8 August 2019.

Section 3 provides further information on consultation undertaken.

Overview of submissions

The DPIE received 70 submissions during the EIS exhibition period, including six submissions from public authorities, one submission from Council and 63 public submissions.

The key issues raised in the submissions related to:

- the non-residential GFA offering to provide for retail, services and employment
- vehicular and pedestrian access, traffic management and car parking
- building scale and design
- the provision of Affordable Housing
- open space
- amenity impacts.

Sections 5 and 6 of this report provide further information on submissions, including issues raised and responses.

Project response to submissions

The concept proposal has been amended to address a number of issues raised during the public exhibition period. Changes made to respond to the issues raised include:

- provision of a wider, publicly accessible pedestrian through-site link
- redistribution and small increase of the non-residential land uses
- reduced residential yield, GFA and car parking spaces
- additional deep soil areas.

Section 7 of this report provides a description of these changes and a comparison of the preferred project to the exhibited project.

Conclusion

Landcom has carefully considered all submissions received during the EIS exhibition period. Additional information has been provided and amendments made to the concept proposal to address issues raised in submissions where required.

The concept proposal is an appropriate development for the site as it is consistent with the applicable zoning and development controls and aligns with the NSW Government's priorities relating to housing affordability, local infrastructure delivery and economic development.

The concept proposal will facilitate further urban renewal along the SMNW corridor and in proximity to the Epping Town Centre.

The proposed building envelope for future development on the site is appropriate in the context of the surrounding locality, complies with the relevant development controls and will provide a

built form outcome that demonstrates high-quality design. Consequently, it is considered that the concept DA should be granted approval.

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 - F. Design Excellence Strategy Report (Landcom)
 - G. Ecologically Sustainable Development Memorandum (ARUP)

Glossary and Abbreviations

Term	Definition
ADG	Apartment Design Guide
concept development application	A concept development application as defined under section 4.22 of the EP&A Act, as <i>a development application that sets out concept proposals for the development of a site, and for which detailed proposals for the site or for separate parts of the site are to be the subject of a subsequent development application or applications</i>
CIV	Capital Investment Value
Concept Proposal	The overall concept for which approval is being sought
Council	The City of Parramatta Council
CPTED	Crime Prevention Through Environmental Design
DA	Development Application
DPIE	NSW Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000 (NSW)</i>
GANSW	Government Architect NSW
Gross Floor Area	GFA
HLEP 2013	Hornsby Local Environmental Plan 2013
m	Metre
m ²	Square metres
RMS	Roads and Maritime Services
RtS	Response to submissions
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SMNWP	Sydney Metro Northwest Places
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
SSD	State Significant Development
Sydney Metro Northwest	Sydney Metro Northwest commenced operations in May 2019. The project involved the construction of eight new metro stations and supporting infrastructure between Tallawong and Cherrybrook and converting five existing stations between Epping and Chatswood. New metro rail line will be extended from Chatswood through Sydney's CBD to Bankstown (Sydney Metro City and Southwest) in 2024.
STM	Sydney Strategic Travel Model
TIA	Traffic and Transport Impact Assessment
TfNSW	Transport for NSW

1. Introduction

1.1. Background

Sydney Metro is Australia's biggest public transport project. As a new standalone railway, this 21st century network will revolutionise the way Sydney travels.

Sydney Metro has four core components:

1. **Sydney Metro Northwest (SMNW)**, formerly the North West Rail Link.

Passenger services commenced in May 2019 between Tallawong/Rouse Hill and Chatswood, with a metro train every four minutes in the peak. The project was delivered on time and \$1 billion under budget.

2. **Sydney Metro City & Southwest**

The Sydney Metro City & Southwest project includes a new 30km metro line extending the metro rail from the end of Sydney Metro Northwest at Chatswood, under Sydney Harbour, through new CBD stations and southwest to Bankstown. It is due to open in 2024 with the ultimate capacity to run a metro train every two minutes each way through the centre of Sydney.

Sydney Metro City & Southwest will deliver new metro stations at Crows Nest, Victoria Cross, Barangaroo, Martin Place, Pitt Street, Waterloo and new underground metro platforms at Central Station. In addition it will upgrade and convert all 11 stations between Sydenham and Bankstown to metro standards.

3. **Sydney Metro West**

Sydney Metro West is a new underground railway between the CBDs of Parramatta and Sydney. This once-in-a-century infrastructure investment will transform Sydney for generations to come, doubling rail capacity between these two areas, linking new communities to rail services and unlocking housing supply and employment growth between the two CBDs.

Sydney Metro West will service key precincts with proposed stations at Westmead, Parramatta, Sydney Olympic Park, North Strathfield, Burwood North, Five Dock, the Bays Precinct and the Sydney CBD.

4. **Sydney Metro Greater West**

Metro rail will also service Greater Western Sydney and the new Western Sydney International (Nancy Bird Walton) Airport. The new railway line will become the transport spine for the Western Parkland City's growth for generations to come, connecting communities and travellers with the rest of Sydney's public transport system with a fast, safe and easy metro service. The Australian and NSW governments are equal partners in the delivery of this new railway.

NSW Government owned land surrounding the SMNW stations includes land that is no longer required to support construction or operation. These sites have been made available for development that supports NSW Government priorities of housing affordability, local infrastructure delivery and economic development.

Through the Sydney Metro Northwest Places Program (SMNWP), Landcom is the master developer for government land around new Sydney Metro Northwest stations. As the master developer, Landcom will lead studies to support planning for project sites, work with local councils, Department of Planning, Industry and Environment (DPIE), other government agencies, local businesses and communities to shape plans for projects.

Landcom will appoint private sector development partners to deliver projects across the program.

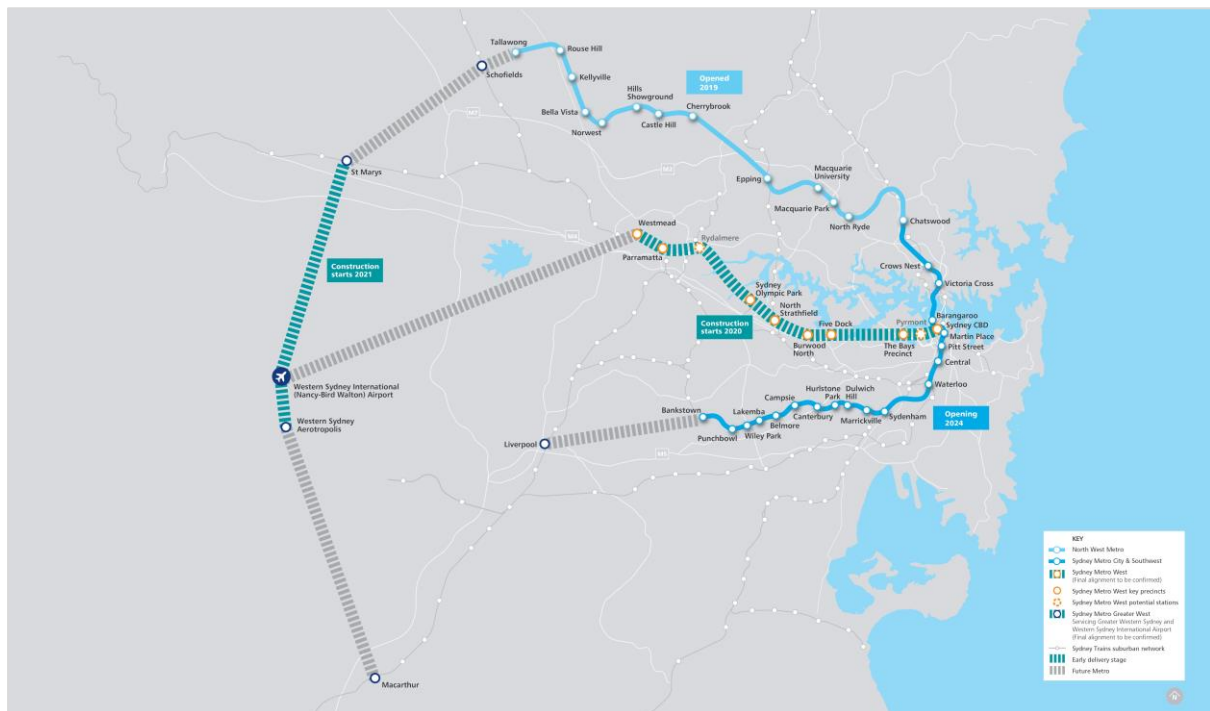


Figure 1: Sydney Metro overview map

1.2. The assessment and approval process

The concept SDDA sets out the vision, planning and development framework that will form the basis for assessment of all future development on the site.

As the Concept Proposal is associated with railway infrastructure and is for residential accommodation and commercial premises with a capital investment value (CIV) of more than \$30 million, the project is identified as State Significant Development (SSD) pursuant to Schedule 1, 19(2)(a) of the *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP).

The SSD application seeks approval for a concept development only and is made under Section 4.22 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) which relates to concept development applications (DAs).

An Environmental Impact Statement (EIS) in support of the Concept Proposal was prepared in accordance with the Secretary's Environmental Assessment Requirements (SEARs) issued by DPIE on 25 June 2019. Following lodgement of the Concept SSD application, the EIS was publicly exhibited for a period of 28 days from 8 August 2019 to 4 September 2019.

A total of 70 submissions were received by the DPIE, including six submissions from government agencies, one submission from Council and 63 public submissions.

1.3. Changes to the exhibited concept proposal

A number of key changes have been made to the concept proposal to address issues raised in the submissions. These key changes are summarised below:

- provision of a wider, publicly accessible pedestrian through-site link
- redistribution and increase of the non-residential floor area
- reduced residential yield, GFA and associated car parking spaces
- additional deep soil planting areas.

Chapter 7 provides further detailed description of the proposed changes and a comparison of the preferred concept proposal.

1.4. Purpose of this report

This RtS report presents responses to the issues raised in the submissions received during the exhibition of the EIS. The RtS report has been prepared in accordance with Clause 85A of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). It also details the final preferred concept proposal.

2. Overview of the exhibited concept proposal

2.1. Overview

The exhibited concept proposal sought approval for:

- future residential flat buildings, comprising three towers connected by two podium structures
- an indicative building envelope with a maximum building height to 48 metres (approximately 15 storeys)
- a residential yield of approximately 442 dwellings (including a minimum 5% dedicated to Affordable Housing)
- a maximum residential GFA of around 39,000m²
- a maximum non-residential GFA of 700m²
- approximately 356 basement car parking spaces
- loading, vehicular and pedestrian access arrangements
- communal and private open space areas and through-site pedestrian link.

2.2. Project objectives

The objectives for the concept proposal are to:

- support the NSW Government's challenge to accommodate population growth close to transport centres
- provide for a diverse range of housing opportunities
- contribute to liveability by providing housing diversity and Affordable Housing in a highly accessible centre
- link future residents to new job opportunities along the Global Economic Corridor
- develop government owned land to support local economic growth
- support a positive shift in travel behaviour as a result of encouraging active transport use.

3. Stakeholder and community consultation

3.1. Consultation associated with public exhibition

The EIS was placed on public exhibition by the DPIE for 28 days, from 8 August 2019 to 4 September 2019.

During the exhibition period, interested stakeholders and members of the public were able to:

- view the EIS online on the DPIE's Major Projects website
- view the EIS in person at:
 - City of Parramatta Council (Council) offices at 126 Church Street, Parramatta
 - the DPIE's Information Centre at 320 Pitt Street, Sydney
 - the Epping Branch Library at Chambers Court, Epping
- make a written submission to the DPIE
- attend the drop-in community information session facilitated by the SMNWP project team at the Epping Club, Epping on 8 August 2019.

Community Information Session

On Thursday 8 August 2019, a two hour drop-in community information session was held at the Epping Club, Epping.

The purpose of the session was to:

- provide an opportunity for the public to speak with the project team about plans for 242-244 Beecroft Road, Epping
- inform the public on how to provide feedback on the proposal directly to DPIE.

The session was advertised through the following channels:

- newspaper advertisements in Northern District Times in the two weeks prior to the session
- an invitational flyer distributed to properties within approximately 800 metres of the site
- social media posts and website updates @landcomplaces and www.smnwplaces.com.au
- Landcom e-news distributed to subscribers and registered contacts.

3.2. Future consultation

The DPIE will make this RtS report publicly available and will undertake further consultation with public authorities and Council.

Landcom also will make the RtS report publicly available via the SMNWP website to ensure Council, stakeholders and the public are informed about the planning status of the concept proposal. Ongoing communications activities will include regular e-news and website updates. The project information line and email address will also be in place for any public enquiries.

4. Analysis of submissions received

4.1. Submissions received

During the exhibition period, submissions were invited from the public and other stakeholders. The receipt of submissions was coordinated and registered by the DPIE and uploaded to the DPIE's website. Submissions were accepted by electronic online submission or post and were forwarded to Landcom for review and consideration.

A total of 70 submissions were registered by the DPIE. A breakdown of submissions received by stakeholder is provided in Table 1.

Table 1: Breakdown of submissions received

Submission type	Number of submissions received
Public submissions	
Public	62
Organisation	1
Subtotal	63
Public Authorities (Government agencies)	
NSW Government departments/agencies	6
Councils	1
Subtotal	7
Total	70

The seven submissions received from Council and Government agencies included:

- The City of Parramatta Council
- Roads and Maritime Services
- Sydney Metro
- Sydney Water
- Environment Protection Authority
- Ausgrid
- Fire and Rescue NSW.

The DPIE also provided a letter setting out additional information or clarification required prior to the final assessment of the project.

Submissions from Council and Government agencies raised issues relevant to their respective areas of interest and responsibility and provided recommendations including suggested conditions of approval for the preferred concept proposal.

Submissions from the Environment Protection Authority, Ausgrid and Fire and Rescue NSW did not raise any key issues or concerns regarding the proposal.

4.2. Summary of issues raised

4.2.1. Key issues raised in public authority submissions

Key issues raised by public authorities included those relating to:

- land use including the provision of commercial GFA for retail, services and employment
- building height, scale and design
- provision of Affordable Housing
- traffic, car parking and access
- acoustic impacts
- open space provision and landscaping
- pedestrian accessibility
- overshadowing
- design excellence.

4.2.2. Key issues raised in public submissions

All of the 63 submissions received from the public raised concerns with the proposal. Key issues raised included:

- building height and scale
- traffic and parking impacts
- impact on residential amenity, including overshadowing and acoustic impacts
- overdevelopment
- inadequate provision of open space and community space
- limited commercial GFA to provide for retail, services and employment
- pedestrian accessibility
- insufficient Affordable Housing
- funding and contributions.

A breakdown of the key concerns raised in public submissions is provided in Table 2. As most submissions raised more than one issue or raised the same issue more than once, the number of issues identified is greater than the total number of submissions received.

Table 2: Key issues raised in public submissions

Key issue category	Number of times key issue was raised
Traffic and car parking	40
Limited non-residential GFA to provide for retail, services and employment	33
Overdevelopment	21
Issues beyond the scope of the SSDA	15
Inadequate open space and community space	8
Insufficient Affordable Housing	6
Building height and scale	2
Pedestrian congestion and accessibility	2
Impacts on residential amenity	1

5. Responses to issues raised in public authority submissions

5.1. Overview

Submissions were received from the following public authorities:

- Roads and Maritime Services
- Sydney Metro
- Sydney Water
- Environment Protection Authority
- Ausgrid
- Fire and Rescue NSW
- City of Parramatta Council.

The DPIE also provided a letter requesting additional information and clarification in relation to the project. A response to the DPIE's request for additional information is provided in Section 5.2.

Issues raised in government agency submissions are addressed in the following sections.

Full details of the issues raised are provided in the complete submissions, available on the Department's major project's website.

5.2. Department of Planning, Industry and Environment

5.2.1. Land Use

Issue raised by DPIE

Outline the benefits and impacts of land use options considered and provide further project justifications in response to the Council's recent Strategic Planning Review for Epping Town Centre, particularly with respect to:

- the availability of commercial floor space and economic impacts
- infrastructure and open space demand.

Response to availability of commercial floor space and economic impacts

The concept proposal, as presented in the EIS, sought approval for around 39,000m² of residential land use and around 700m² of non-residential land use for facilities or services to meet the day-to-day needs of residents. The land uses proposed as part of the concept proposal are consistent with the site's R4 High Density Residential land use zone.

The site is strategically located in proximity to the Epping Town Centre, endorsed by the NSW Government in October 2012 as a Priority Precinct (formerly known as an Urban Activation Precinct, UAP). The concept proposal complements the strategic planning work undertaken by the NSW Government by facilitating future high-density residential development on a site that is in close proximity to public transport and services.

Landcom engaged Hills PDA to assess the provision of commercial floor space and economic impacts on the viability of the concept proposal (refer Appendix C).

The Hill PDA assessment finds that there is approximately 30,000m² of non-shop front office space in Epping (mostly located above ground level) with a current vacancy rate of around 24%, which is considered high for a suburban centre. The Epping Town Centre offers competitively priced commercial office space, relative to other markets such as Macquarie Park, including lower parking levies.

Notwithstanding these competitive advantages, the Hill PDA assessment finds that there has been a withdrawal of office space in the Epping Town Centre in recent years as a result of:

- changes in the economic climate
- the nature of building stock
- increased competition from higher-order nearby centres (such as Macquarie Park, Norwest, Chatswood and Parramatta) which possess significant competitive advantages over the Epping Town Centre
- lack of critical mass and business agglomeration
- the growing perception of Epping as a residential and service focused centre as opposed to a prestigious office location.

The Hill PDA assessment also finds that demand for office space in Epping from larger companies and institutional investors is very weak. The assessment identified that investors prefer alternative locations such as Macquarie Park, Chatswood, Parramatta and Sydney CBDs due to the availability of newer, more efficiently designed buildings, superior access to services and amenity and proximity to other businesses.

The Hill PDA assessment further outlines several other constraints that would undermine the viability of a significant commercial offering on the site, including:

- the site's recent rezoning to R4 High Density Residential was not intended to accommodate large scale office and business uses
- the site would struggle to compete with higher-order nearby commercial centres which offer significant competitive advantages
- the site is not of sufficient scale to make development attractive for many prospective office tenants, particularly given its fringe location in a predominantly residential location
- the site is located outside of the Epping Town Centre with Carlingford Road being a significant barrier to the town centre
- the distance from Epping Station is a significant deterrence for prospective commercial and retail tenants, particularly tenants that rely on high accessibility and passing trade
- an increase of the commercial floor space would potentially result in additional traffic and congestion.

The Hill PDA assessment supports Landcom's original findings in the EIS. That is, the viability of non-residential uses on the site and the ability to draw prospective commercial tenants is compromised as a result of the site constraints. Accordingly, the site is not suitable for large-scale commercial uses. The smaller offering of non-residential uses on the site (700m²) is

considered appropriate for smaller-format commercial and retail operations to service the future on-site population.

Response to infrastructure and open space demand

In response to infrastructure and open space demand, an indicative total area of 2,905m² of communal open space is proposed for the site. This will be provided in courtyards between the residential flat buildings, as terraces on the rooftop of the two podium structures linking the residential flat buildings and building rooftops. The provision of communal open space areas on the site for future residents is considered adequate.

Further, the through-site pedestrian link has been redesigned to provide a wider, publicly accessible link between Beecroft Road and Ray Road. The through-site link will facilitate convenient movement across the site and allow for passive surveillance of open spaces from residential apartments and ground level activation.

Issue raised by DPIE

Provide further justification for the amount of Affordable Housing included within the proposal, including having regard to the Greater Sydney Commission and City of Parramatta Council's Affordable Housing targets.

Response

The concept proposal provides for a minimum of 5% of future residential dwellings to be designated as Affordable Housing. The management of Affordable Housing will be undertaken in partnership with a registered Community Housing Provider.

The Affordable Housing offering proposed as part of the concept proposal is consistent with Landcom's *Housing Affordability and Diversity Policy* (September 2017) which sets out a target of 5-10% of new homes as Affordable Housing across each project. In accordance with the Policy, individual projects will determine the appropriate target for Affordable Housing based on the opportunity and characteristics of the project.

The Affordable Housing offering is also consistent with the Greater Sydney Commission's *Greater Sydney Region Plan* which outlines an aspirational target of 5-10% of new residential floor space to be attributed toward Affordable Housing in the Greater Sydney region (subject to viability).

The total number of Affordable Housing dwellings will be determined as part of the future DAs for the site.

5.2.2. Building height

Issue raised by DPIE

Amend building envelopes to provide a minimum 3.3m floor to ceiling heights for any commercial floor space or non-residential uses.

Response

The concept proposal has been amended to ensure the floor to ceiling height for non-residential uses, including any commercial land uses, is a minimum of 3.3 metres. This has been achieved by lowering the ground floor level of the development and is confirmed in the revised Urban Design Report at Appendix A.

Issue raised by DPIE

Consider any additional building height required to meet the above point may exceed the maximum building height standard and may require localised reduction in residential floors, changes in ground levels and/or further excavation of the site.

Response

The increased floor to ceiling height has been achieved by lowering the ground floor level of the development and will not result in an exceedance of the maximum building height controls for the site under the Hornsby Local Environmental Plan 2013 (HLEP 2013). This is confirmed in the revised Urban Design Report at Appendix A.

Landcom accepts the inclusion of this requirement to be included as a condition to be satisfied in future detailed DAs.

5.2.3. Urban Design and Landscaping

Issue raised by DPIE

Further consider the site layout and design guidelines for landscaping and open space to support the following:

(i) appropriate and adequate landscaping along the street frontages of the site, particularly with respect to:

- any basement protrusions and/or above ground car parking fronting Ray Road
- treatment / interface between residential courtyards and landscaping setbacks, including consideration of any high acoustic fencing required along Beecroft Road.

Response

The revised Urban Design Report (Appendix A) includes a Public Domain and Landscape Plan that identifies the location of future landscaped areas on the site. Landscaped areas will be provided along street frontages and within the through-site pedestrian link.

The Public Domain and Landscape Plan provides a basis for the assessment of future DAs. The future DAs will provide further, detailed descriptions of proposed landscaping on the site, including adequate landscaping features to address basement protrusions and/or above ground car parking fronting Ray Road.

The issue of treatment / interface between residential courtyards and landscaping setbacks, including consideration of any high acoustic fencing required along Beecroft Road, will be assessed in the future DAs that are relevant to that part of the site.

Landcom accepts these requirements being included as conditions to be satisfied in future detailed DAs.

Issue raised by DPIE

Further consider the site layout and design guidelines for landscaping and open space to support the following:

(ii) building identity and good quality pedestrian access to all residential lobbies, particularly where building entry will not be visible from the street.

Response

Future DAs will provide further, detailed analysis of pedestrian access to residential lobbies and wayfinding features to ensure appropriate building identification.

Landcom accepts these requirements being included as a condition to be satisfied in future detailed DAs.

Issue raised by DPIE

Further consider the site layout and design guidelines for landscaping and open space to support the following:

(iii) clear hierarchy and delineation of public and private communal open spaces and connections, including clear environmental ques (sic), access and interface with the proposed buildings and land uses.

Response

Future DAs will provide further, detailed information around public and private communal open space areas and connections including, access and interface with the future buildings and land uses on the site.

Landcom accepts this requirement to be included as a condition to be satisfied in future detailed DAs.

Issue raised by DPIE

Further consider the site layout and design guidelines for landscaping and open space to support the following:

(iv) the public character of the proposed through-site link with further consideration of dimensions of space and access thereof, accessibility/gradient, visual connection and passive surveillance.

Response

The through-site pedestrian link has been redesigned as a wider, publicly accessible pedestrian link from Beecroft Road to Ray Road. The public character of the through-site link including its dimensions, accessibility, clear sightlines and passive surveillance will be further refined in future detailed DAs for the site.

5.2.4. Overshadowing

Issue raised by DPIE

- Provide project response to State Design Review Panel feedback in relation to the impacts of the proposal on the development potential of 246 Beecroft Road (7-Eleven Service Station site).
- Provide shadow diagrams in sun's eye views at hourly intervals in mid-winter for a permissible maximum building envelope for 246 Beecroft Road having regard to its development potential and ability to achieve ADG compliant solar access to potential residential development.

Response

The revised Urban Design Report (Appendix A) includes shadow diagrams at hourly intervals between 9am and 3pm in mid-winter.

The land at 246 Beecroft Road is zoned B2 Local Centre under the HLEP 2013. Notwithstanding, the revised Urban Design Report includes a massing diagram demonstrating that compliance with the Apartment Design Guide (ADG) is achievable on the site, even with the building envelopes sought as part of the concept proposal.

5.2.5. Traffic, parking and access

Issue raised by DPIE

Provide a revised Traffic and Transport Impact Assessment (TIA) to address the following:

- further information to substantiate the reported traffic distribution rates (12% outbound and 15% inbound) via Beecroft Road north of the site. The distributions appear to be low, considering the route provides access to the M2 Motorway.

Response

The future traffic distribution was derived and summarised in the *Proposed Epping Town Centre Redevelopment, Rawson Street Epping, Traffic Study* prepared by GTA and reviewed by AECOM (November 2015) and referenced in the *Interim Traffic Modelling Report* (EMM, 2017). Hence, the TIA has maintained the same traffic distribution for consistency purpose.

The distribution is based on a select link analysis from the Sydney Strategic Travel Model (STM), which is owned and operated by Transport for NSW (TfNSW). This strategic model is based on census data, household travel surveys, the public transport network and road network. The TfNSW website states that the model can be used “to determine potential usage levels of proposed new transport infrastructure or services” (i.e. the distribution of travel).

Over 60 percent of the Epping Town Centre development traffic is estimated to travel to / from the east (Epping Road east and Blaxland Road east) via Epping Bridge. Traffic via Beecroft Road north is 12 percent outbound and 15 percent inbound during AM and PM peak. The distribution of future peak hour residential traffic across the surrounding road network is further analysed in the Traffic and Parking Technical Memorandum (Appendix D).

Issue raised by DPIE

Provide a revised TIA to address the following:

- provide graphical representation of the required inbound and outbound traffic routes during peak periods having regard to existing peak and non-peak turning restrictions at intersections near the site.

Response

The Traffic and Parking Technical Memorandum (Appendix D) assumes the ratio of inbound to outbound trips to be 10%:90% (during the AM peak) and 90%:10% (during the PM peak). Based on the trip distribution pattern shown in **Figure 2**, the expected vehicular trip increase during the AM and PM peak hours on the surrounding road network as a result of the proposed development yield (i.e. 432 dwellings) is shown in **Figure 3**.

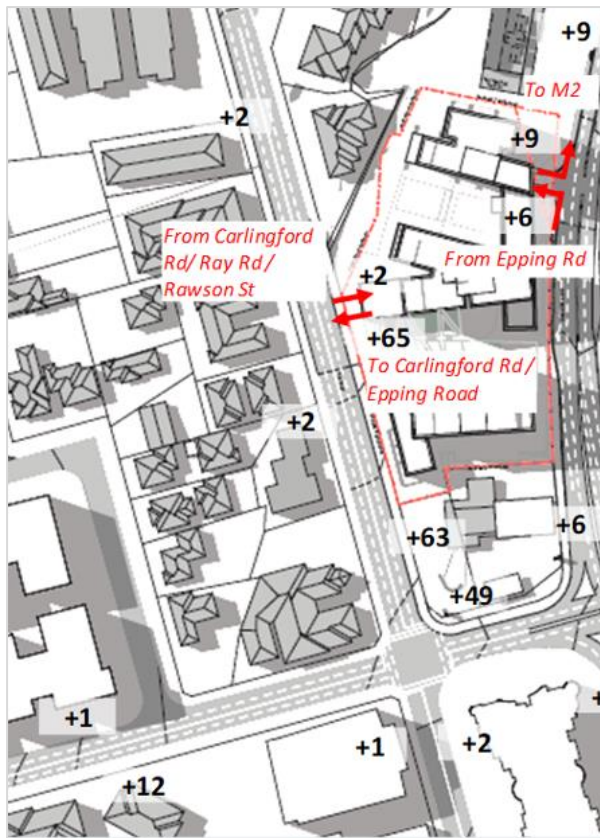


Figure 2: AM Peak (Source: SCT Consulting)

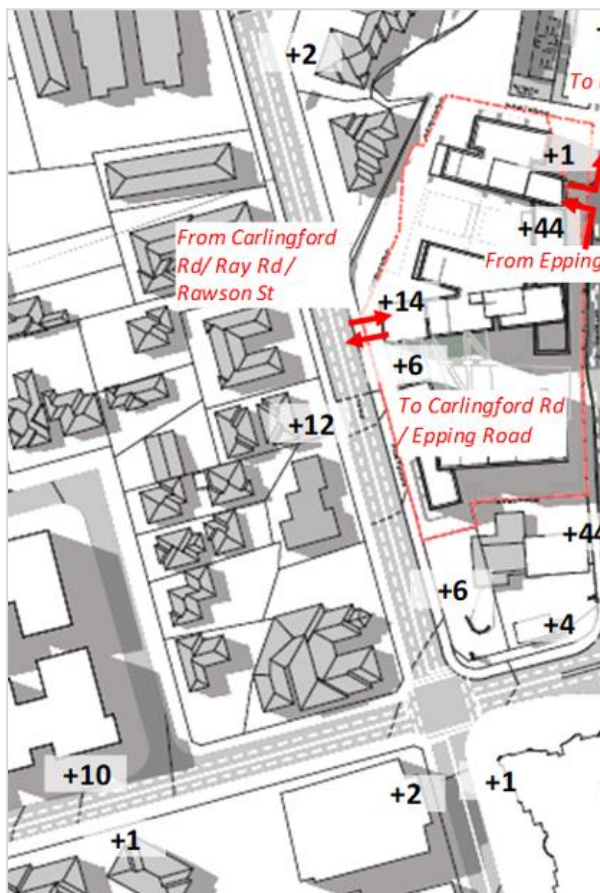


Figure 3: PM Peak (Source: SCT Consulting)

During the AM peak hour, the maximum increase on the surrounding road network is along Ray Road and Beecroft Road (south of Carlingford Road) which has an increase of approximately 50 to 60 vehicles per hour (no more than one vehicle per minute). The highest increase of traffic during the PM peak is along Beecroft Road, which has an increase of approximately 44 vehicles per hour (less than one vehicle per minute).

Issue raised by DPIE

Provide a revised Traffic and Transport Impact Assessment to address the following:

- access to visitor and non-residential car spaces (with consideration of any traffic restrictions and reasonable way finding).

Response

The Traffic and Parking Technical Memorandum (Appendix D) notes that vehicular access to the development is proposed at Ray Road and Beecroft Road. Both access points are interconnected via the internal car park. The western access on Ray Road functions as a shared access for residential (visitors and non-visitors), non-residential and loading traffic.

The eastern access is a dedicated residential (visitors and non-visitors) access at Beecroft Road. Appropriate wayfinding signs are recommended internally within the car park to guide visitors to the dedicated visitor car parking spaces. Wayfinding will be further refined as part of the future DAs for the site.

Access points to the car parking areas within the development are shown on the floorplans provided in the revised Urban Design Report (Appendix A).

Issue raised by DPIE

Provide a revised Traffic and Transport Impact Assessment to address the following:

- impact of the use of the deceleration lane from Beecroft Road to the Sydney Metro Epping Service Facility.

Response

The Traffic and Parking Technical Memorandum (Appendix D) notes that the proposed access to and from Beecroft Road will be a left-in / left-out priority intersection to minimise conflicts with traffic on a State arterial road. The concept and the design of proposed access at Beecroft Road has been developed in consultation with Roads and Maritime Services (RMS).

The proposed left-in movement on Beecroft Road will be provided via a deceleration lane of approximately 30 metres long to allow entering traffic to slow down without interfering with through-traffic on Beecroft Road. Speed controls or speed reductions could be investigated by RMS along the deceleration lane to deter Epping Service Facility related vehicles entering the lane as well as to reduce vehicle speed and improved safety.

Vehicles exiting from the development can only turn left onto Beecroft Road. They will have clear sightlines to oncoming vehicles on Beecroft Road travelling northbound or traffic entering the Epping Service Facility, before safely merging right into Beecroft Road traffic. Due to the small number of vehicles expected to turn left from the driveway access (less than 10 vehicles per hour during the peak), the potential conflicts with traffic entering the site or Epping Service Facility as well as traffic on Beecroft Road would be minimal.

Issue raised by DPIE

Provide a revised TIA to address the following:

- cumulative traffic impacts from concurrent developments (approved and under construction) in the area with respect to traffic and transport issues, including on-street parking and construction traffic.

Response

The Traffic and Parking Technical Memorandum (Appendix D) states that the concept SSD application provides the opportunity to create a transit-oriented centre by reducing the amount of car parking, reflecting the higher level of public transport services. The best approach to facilitate / influence reduced private vehicles usage and to minimise further congestion to the surrounding road network is to restrain car parking provisions while offering attractive public transport alternatives. In this case, Sydney Metro and its connecting bus networks provide appropriate alternatives.

The proposed development is expected to generate up to 80 trips during the peak periods, of which 60 trips are expected to exit the site in the AM peak via Ray Road as a worst case, hence this level of additional traffic should be accommodated in the current road network.

This development would form part of the large housing targets as proposed in Council's draft Local Strategic Planning Statement and targeted housing growth, with minimal vehicular traffic impacts given its higher level of public transport services.

Issue raised by DPIE

Provide a revised TIA to address the following:

- travel analysis to include Journey to Work travel zones to the west of the site (across Ray Road).

Response

Revised Journey to Work data, including data obtained from the Australian Bureau of Statistics (2011 and 2016) is provided in the Traffic and Parking Technical Memorandum (Appendix D).

Issue raised by DPIE

Provide a revised Traffic and Transport Impact Assessment to address the following:

- clarify discrepancies in public transport trip generation. The reported total of 171 daily trips appears incorrect as 88 trips are expected to be generated in the AM peak and 70 trips are expected in the PM peak, leaving only 13 trips outside peak periods. The daily metro / train trips appear incorrect as 128 trips are reported daily, whereas the AM and PM peak hour trips reported equal 142 trips alone.

Response

A summary of the number of additional train and bus trips that are likely to be generated by the proposed development is provided in the Traffic and Parking Technical Memorandum (Appendix D).

The development is expected to account for 68 trips in the AM peak, 22 trips in the PM peak and a total of 164 daily trips. Given the development comprises predominantly residential land use, most trips are expected to be made during the AM and PM peak periods.

Issue raised by DPIE

Provide an assessment of the surrounding on-street car parking conditions and what impacts the proposal may have on on-street parking.

Response

The Traffic and Parking Technical Memorandum (Appendix D) states that the proposed development off-street parking provision is consistent with Council's DCP and provides appropriate allowance of parking spaces for residents and visitors. Hence the likelihood for overspill parking onto surrounding street network is negligible.

For the non-residential component, the proposed development also suggested off-street parking provision that is consistent with Council's DCP and would provide appropriate allowance of parking spaces for employees and visitors. Hence the likelihood for overspill parking onto surrounding street network is negligible. Despite the off-street supply, there could be demand for on-street parking by visitors during business hours. However, due to the small component of non-residential supply, the demand for on-street parking will be minimal.

Issue raised by DPIE

Provide construction related traffic and transport impacts (e.g. trip generation, distribution, routes, management, access and pedestrian/cyclist impacts) and discussion of mitigation measures.

Response

The Traffic and Parking Technical Memorandum (Appendix D) states that construction haulage routes would likely be limited to access via Beecroft Road, to minimise impacts to pedestrians and bus operations on Ray Road.

Due to the preliminary nature of the development concept, the construction task has not been fully defined. Further engineering design work is required before this can be completed. A construction traffic management plan will be prepared at the future DA stage, in accordance with the Traffic Control at Work Sites Manual (RMS, 2010).

Issue raised by DPIE

Detail consultation outcomes and advice from RMS and Council on the proposed vehicular access arrangements and potential for an east-west link road.

Response

Two traffic workshops were held in April and July 2019 to better understand the traffic congestion issues in and around the Epping Town Centre. The workshops were carried out with representatives from RMS, Council, Sydney Metro and Landcom's project team.

Following the workshops, Council maintained the view that an east-west vehicular link road (E-W Link Road) through the site will contribute to the resolution of traffic congestion in the Epping Town Centre.

Landcom has determined, through a number of investigations and studies, that the E-W Link Road is not a sustainable, long-term option to address traffic congestion on roads in proximity to the site.

Complete Streets Pty Ltd (Complete Streets) was engaged by Landcom to undertake a review and analysis of the Epping Town Centre Traffic Study (EMM, 2018), which was prepared as part of the Epping Planning Review process undertaken by Council. Outcomes of the review by

Complete Streets are discussed in greater detail in the Traffic and Parking Technical Memorandum (Appendix D). The key findings of the review by Complete Streets are summarised below:

- an E-W Link Road would only result in stabilising the existing traffic and any minimal benefit will be immediately absorbed by the existing latent demand
- there is the potential for road safety concerns to arise should queuing onto Beecroft Road occur from traffic queuing Ray Road end
- the E-W Link Road was previously proposed by Council to TfNSW in 2013, however TfNSW identified that this would reduce the ability for future transit oriented development that takes advantage of the site's proximity to Epping Station, and therefore reduced reliance on private vehicle use.

In summary, Landcom has considered the provision for an E-W Link Road but concludes no sustainable public benefit would be achieved.

A through-site pedestrian link that provides a green spine offering open space and safe walking access has been redesigned within the concept scheme and offers positive placemaking outcomes. The proposed through-site pedestrian link will encourage walking and bicycle riding around the site and through the Epping Town Centre in keeping with the overall vision for the Epping Town Centre. The indicative location of the proposed through-site pedestrian link is shown in Figure 4.

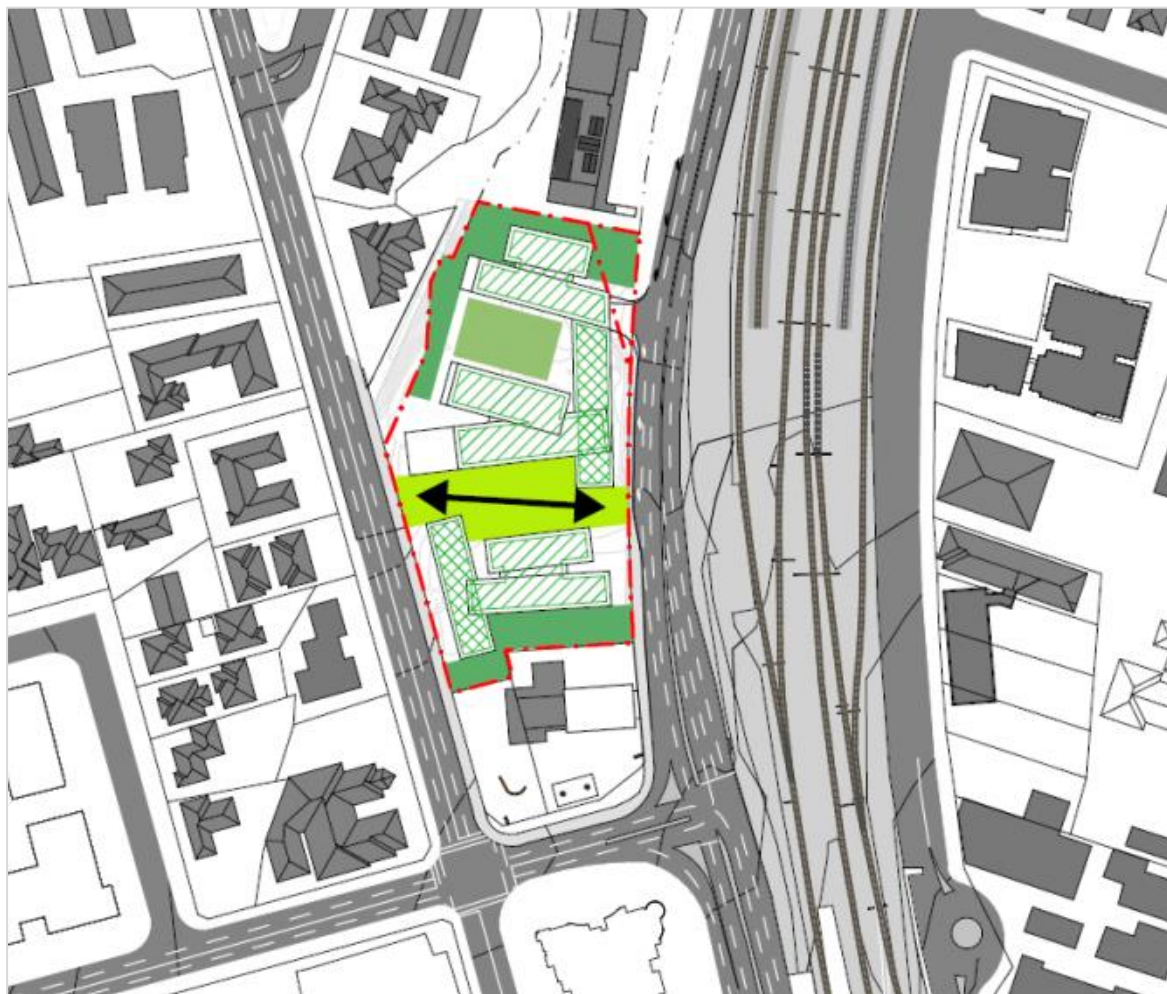


Figure 4: Location of the east-west through-site pedestrian link (Source: Bennet and Trimble)

5.2.6. Noise and Vibration Assessment

Issue raised by DPIE

Provide a revised Noise and Vibration Impact Assessment to address the following:

- demonstration of acoustic mitigation measures that are capable of achieving compliant noise levels and natural ventilation to apartments in accordance with Infrastructure SEPP, SEPP 65 and the Apartment Design Guide.

Response

Future DAs for the site will provide further, detailed analysis in relation to acoustic mitigation and compliance with the relevant noise levels and natural ventilation to apartments to achieve ADG compliance. Potential acoustic mitigation measures to be detailed in the future DAs may include:

- thicker high performance glazing
- winter gardens to form a buffer to noise sources
- building articulation to form acoustic shadows for ventilation sources
- trickle vents to windows and facades
- acoustic glazing
- locating mechanical ventilation intake (including air conditioning) away from pollution sources.

Issue raised by DPIE

Provide a revised Noise and Vibration Impact Assessment to address the following:

- provide daytime predicted external noise levels for all affected facades and specify mitigation measures, if required.

Response

Daytime predicted external noise levels for all affected facades are outlined in Section 5.5 of the revised Noise and Vibration Impact Assessment (Appendix E). Potential mitigation measures are listed above.

Issue raised by DPIE

Provide a revised Noise and Vibration Impact Assessment to address the following:

- identify the modelled locations for “Podium East – North portion” and “Podium East – South portion”.

Response

The modelled locations at the eastern podium (adjacent to Beecroft Road and labelled ‘Podium North’ and ‘Podium South’) are shown on Figure 5-1 of the revised Noise and Vibration Impact Assessment (Appendix E).

Issue raised by DPIE

Provide a revised Noise and Vibration Impact Assessment to address the following:

- review the accuracy of Table 5-8 for predicted noise levels as several inaccuracies appear, which have flow on effects for the recommended mitigation measures.

Response

The revised Noise and Vibration Impact Assessment includes an amended Table 5-8 that addresses the previous inaccuracies.

Issue raised by DPIE

Provide a revised Noise and Vibration Impact Assessment to address the following:

- review Table 5-5 in relation to reported total night time noise level at Podium East – North portion, as the predictions in Tables 5.5.1 and 5.5.2 are significantly higher. Table 5-8 later in the report may be accurate, containing a predicted level of 68 dBA rather than 50 dBA. Clarify mitigation measures accordingly.

Response

The revised Noise and Vibration Impact Assessment (Appendix E) includes amended Table 5-5 and Table 5-8 to address the previous inaccuracies.

5.2.7. Design Excellence Strategy

Issue raised by DPIE

Undertake consultation with Government Architect to further refine the proposed Design Excellence Strategy and process.

Response

Landcom held a meeting with the Government Architect NSW (GANSW) on 27 September 2019. In response to the matters discussed at this meeting, Landcom has revised the Design Excellence Strategy Report (Appendix F). The revised Strategy is set out in two key parts:

- Design Excellence Approach: this section describes the concept design review process to align with the GANSW strategies and the important elements of the scheme to consider as part of the design excellence strategy.
- Design Excellence Procurement Strategies: this section describes the overall process and how design excellence is achieved during the future stages of the development.

Landcom acknowledges the value of collaboration with GANSW, particularly in the early stages of the project. The role of GANSW in relation to the future development of the site is proposed to include:

- collaboration with Landcom and Sydney Metro to develop the design excellence strategy for the site. GANSW will be required to endorse the design excellence strategy prior to SSD determination
- technical expertise to DPIE with advice during the SSD and further relevant DA assessment periods
- facilitation of the State Design Review Panel process

- guidance in relation to design vision and objectives, green infrastructure, movement and place, heritage, sustainability and other design considerations.

5.3. City of Parramatta Council

5.3.1. Provision of a link road through the site

Issue raised by Council

Council's traffic study has identified that the provision of an E-W Link Road through the site connecting Ray Road and Beecroft Road will take pressure off peak hour traffic delays and congestion at key intersections in the long term when coupled with other identified road improvements.

Response

The provision of an E-W Link Road through the site and Landcom's response to this issue is discussed in detail at Section 5.2.5.

5.3.2. Provision of additional retail and commercial floor space

Issue raised

Council requests the application be amended to include additional retail and commercial floor space in the order of 1:1 FSR (10,120m²) to address job targets set out in the Region and District plans.

Response

An additional 52m² of non-residential GFA is included as part of the concept proposal, increasing from 700m² to 752m² in total. The provision of commercial land use is comprehensively addressed at Section 5.2.1 and in the Hill PDA assessment included at Appendix C.

The Hill PDA assessment confirms that the subject site is not located within the Epping Town Centre, but rather just outside by definition of the zoning. Further, Carlingford Road carries significant traffic and is a pedestrian barrier between the site and the town centre to the south. Hill PDA therefore finds there to be better opportunities to provide employment uses in the Epping Town Centre south of Carlingford Road with considerable shorter walking times from the Epping Station.

The subject site is a secondary commercial location. Hill PDA considers the likely market rent would be considerably lower than sites within the town centre, reflecting its less desirable location. Given the current level of office vacancies in Epping (24%), it would be difficult finding tenants for any above ground floor commercial space on the subject site and there is a high risk of considerable long-term vacancies.

In summary, the site is not considered suitable for large-scale commercial uses based on Hill PDA's key findings, including that:

- the site's recent rezoning to R4 High Density Residential was not intended to accommodate large scale office and business uses
- the site would struggle to compete with higher-order nearby commercial centres which offer significant competitive advantages

- the site is not of sufficient scale to make development attractive for many prospective office tenants, particularly given its fringe location in a predominantly residential area
- the site is located outside of the Epping Town Centre with Carlingford Road being a significant barrier to the town centre
- the distance from Epping train station is a significant deterrence for prospective commercial and retail tenants, particularly tenants that rely on high accessibility and passing trade
- an increase of commercial floor space on the site would potentially result in additional traffic and congestion on an already constrained intersection.

5.3.3. Car parking

Issue raised

Council requested the car parking rates for the development be consistent with the car parking rates specified in the *Hornsby Development Control Plan 2013* (HDCP 2013).

Response

As the development is within 400 metre walking distance to Epping Station and the Epping Town Centre, Landcom agrees with Council that parking provision for the proposed development should be minimised to leverage these opportunities and to reduce the future residents' reliance on private vehicle use. The minimised car parking provisions will ensure that the development does not add further congestion to the surrounding road network.

The latest design scheme demonstrates that the lowest parking rates have been applied for the residential part of the development based on proposed dwelling types. They are generally consistent with the parking rates in the HDCP 2013 (amended in May 2019) and the RMS Guide to Traffic Generating Developments for Metropolitan Regional (CBD) Centres.

The original concept scheme recommended that visitor parking rates should be provided at maximum 1 space per 10 units, as suggested by several relevant planning documents including the Parramatta Development Control Plan 2011, Section 4.1 – Epping Town Centre. However, it is acknowledged that higher visitor parking rates (i.e. 1 space per 7 units) was requested by Council.

To comply to Council's request, the concept proposal has been amended to provide a minimum of 62 visitor parking spaces (based on 1 space per 7 units for 432 dwellings) and 270 resident parking spaces (which still comply with HDCP 2013 maximum rates, with Council's intent to minimise residential parking provision). The latest scheme also includes three car share parking spaces, 14 motorcycle spaces and 476 bicycle spaces. The car parking provisions are outlined in Table 3.

Dwelling type	No. of units	Number of parking spaces required						
		Epping Town Centre UAP Structure Plan (maximum rates)	Hornsby DCP 2013 – Epping Town Centre Core (minimum rates)	PDCP 2011 (minimum rates)	PDCP 2011, Section 4.1 – Epping Town Centre (maximum rates)	RMS Guide to Traffic Generating Developments (minimum rates)	HDGP 2013 (amended on 31 May 2019) (maximum rates)	Proposed parking rates in the latest scheme
Studio	47	0	0.5	0	0.5	0.4	0.4	0.4 (max)
1 Bed	104	1	0.75	1	0.75	0.4	0.4	0.4 (max)
2 Bed	221	1	1	1	1	0.7	0.7	0.7 (max)
3+ bed	60	1	1.5	1.2	1.5	1.2	1.2	1.2 (max)
Visitor spaces	-	0.1	0.1	0.25	0.1	0.143	0.143	0.143 (min)
Total	432 units	428 car spaces	456 car spaces	505 car spaces	456 car spaces	349 car spaces (max rate applied)	349 car spaces (max rate applied)	332 car spaces

Table 3: Summary of car parking rates and provisions proposed as part of the concept proposal

5.3.4. Urban design

Issue raised

Council raised a number of issues relating to the design of future development on the site including on-site circulation, building setbacks, car park entries, lifts to the top levels of the buildings and amenity for future residents.

Response

The revised Urban Design Report (Appendix A) includes further detail in relation to the development design.

There is a seven metre setback requirement that applies to the eastern and western site boundaries (setback from Beecroft Road and Ray Road) and a six metre side setback requirement along the northern and southern site boundaries. The concept proposal includes building envelopes that would encroach marginally within the setbacks to Beecroft Road and Ray Road, as well as a small encroachment within the southern and north-western boundary setbacks. The encroachments will have a negligible overall impact on the adjoining land uses.

The car park entries are detailed on the drawing plans provided in the revised Urban Design Drawings set (Appendix B).

The built form and design of future structures on the site will be subject to additional detailed assessment as part of future DAs. This will include impacts of having lifts to the top levels of the future buildings and impacts on the amenity of future residents.

5.3.5. Public domain and landscaping

Issue raised

Council raised a number of issues relating to the public domain and landscaping on the site including the provision of street trees and private landscaped areas.

Response

The Public Domain and Landscape Plan provided in the revised Urban Design Report (Appendix A) identifies the location of deep soil areas, landscaped buffers to neighbours, landscaped terraces and landscaped forecourt to the non-residential uses.

The concept proposal has been amended to provide additional deep soil areas from 2,063m² to 2,200m². Further, the development will include 2,710m² of communal open space to be provided in courtyards between the residential flat buildings, as terraces on the rooftop of the two podium structures linking the residential flat buildings and the rooftops of the buildings.

The conceptual landscaping plan provides a basis for the assessment of future DAs for the site. The future DAs will provide further, detailed analysis of public domain and landscaping features.

5.4. Roads and Maritime Services

Issues raised

RMS provided a number of advisory comments for consideration, including:

- All buildings and structures, together with any improvements integral to the future use of the site shall be wholly within the freehold property (unlimited in height or depth), along the Beecroft Road boundary.
- Roads and Maritime notes that the proposed development will involve road works on Beecroft Road, which will require concurrence from Roads and Maritime under Section 138 of the *Roads Act 1993*.
- All vehicles shall enter and exit the site in a forward direction.
- The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements in relation to landscaping and/or fencing, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1-2004, AS2890.6-2009 and AS 2890.2-2018.
- The proposed development will generate additional pedestrian movements in the area. Pedestrian safety is to be considered in the vicinity.
- A Construction Pedestrian Traffic Management Plan (CPTMP) shall be submitted in consultation with the TfNSW Sydney Coordination Office (SCO), Roads and Maritime, and Parramatta City Council, prior to the issue of a Construction Certificate. The CPTMP needs to include, but not be limited to, the following: construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control, taking into consideration the cumulative traffic impacts of other developments in the area.

- All demolition and construction vehicles are to be contained wholly within the site and vehicles must enter the site before stopping.
- A Road Occupancy Licence (ROL) should be obtained from Transport Management Centre for any works that may impact on traffic flows on Beecroft Road and Carlingford Road during construction activities.

Response

In response to RMS' comments, Landcom accepts for the following requirements to be included as conditions that are to be satisfied in the future detailed DAs:

- All future buildings and structures are to be wholly contained within the freehold property.
- A Section 138 Certificate under the *Roads Act 1993* is to be obtained for works on Beecroft Road as part of the future DAs for the site.
- All vehicles are to enter and exit the site in a forward direction and confirmed as part of a CPTMP.
- The car park layout is to be constructed in accordance with the relevant Australian Standards and subject to further assessment as part of the future DAs for the site.
- Pedestrian safety is to be subject to further assessment as part of the future DAs for the site.
- A CPTMP is to be prepared as part of the future DAs for the site and submitted to the relevant authorities for consideration.
- Construction vehicles are to be wholly contained within the site and shall enter the site before stopping. This requirement will be confirmed as part of the CPTMP to be prepared for the future DAs.
- A ROL is to be obtained for any future works that may impact on traffic flows on Beecroft Road and Carlingford Road during construction.

5.5. Sydney Metro

Issues raised

Sydney Metro considers that the proposed development would potentially impact on the operation and safety of the Sydney Metro Northwest rail corridor due to the proximity of proposed underground works.

It is therefore requested that any future DAs be required to prepare and submit documentation compliant with the Sydney Metro Underground Protection Technical Guidelines, as part of the conditions of consent.

Response

Landcom accepts this requirement to be included as a condition to be satisfied in future detailed DAs.

5.6. Sydney Water

Issues raised

Sydney Water advised that it is currently undertaking an Options Assessment for Epping to St Leonards, due for completion in mid-2020. This study will include growth proposed by this development and will allow for more detailed requirements to be specified. If the development intends to proceed ahead of this timeframe, a detailed planning study must be carried out by the developer to determine whether augmentation of existing local water infrastructure is required to cater for the growth associated with proposed development.

Notwithstanding, Sydney Water provided the following requirements for any future development in relation to water servicing, wastewater servicing and stormwater:

- for a multi-storey development (>8 storeys) the Water Supply Code of Australia requires the mains fronting the development be at least a 200 mm. Therefore, the main along Ray Road will need to be upsized
- upgrades to parts of the wastewater system may be needed within the surrounding area
- future buildings and permanent structures are required to be 1 metre from the outside face of the major Sydney Water stormwater channel located near the north-western boundary of the site
- any approved building plans must be submitted to Sydney Water to determine whether the development will affect any Sydney Water sewer or water main, stormwater drains and/or easements.

Sydney Water further advised that detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred for a Section 73 application.

Response

The revised Urban Design Report (Appendix A) includes a plan that demonstrates the future buildings and permanent structures will be located further than one metre from the outside face of the adjoining Sydney Water stormwater channel to the north-west of the site.

Landcom acknowledges the matters raised by Sydney Water and accepts these requirements to be included as conditions to be satisfied in future detailed DAs.

5.7. Environment Protection Authority

The EPA advised that the proposal does not constitute a Scheduled Activity under Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) and does not require an Environmental Protection Licence under the POEO Act.

Accordingly, the EPA raised no concerns with the concept proposal.

5.8. Ausgrid

Ausgrid raised no concerns with the concept proposal.

5.9. Fire and Rescue NSW

Fire and Rescue NSW raised no concerns with the concept proposal.

6. Responses to issues raised in public submissions

6.1. Traffic and parking

This section provides responses to issues raised in relation to the traffic and parking impacts associated with the concept proposal.

6.1.1. Traffic impacts

Summary of issues raised

A number of submissions raised concerns about the impacts of the concept proposal generally on traffic, congestion and individual roads, and impacts on the performance of the road network. Issues raised included:

- increased density putting further demand on pedestrian crossing and causing further traffic delays
- commercial floor space will result in increased vehicular movements
- construction of the proposed works will cause increased traffic congestion
- enforcement of existing rules, including no street parking or turning right onto Ray Road during AM and PM hours
- vehicles turning left in/out of will not be visible to traffic along Beecroft Road – from new through-site link.

Response

The EIS included a comprehensive assessment of potential traffic impacts associated with the development including impacts on the surrounding road network from increased vehicular traffic due to the increased residential density.

The EIS noted that the Beecroft Road access will include a new deceleration lane and that the provision of access points at both the eastern and western boundaries of the site is expected to better disperse traffic across the surrounding road network.

The EIS further provided information relating to the RMS works that are being undertaken in proximity to the site. Stage 1 works involve upgrades to the intersection of Beecroft Road and Carlingford Road, including the provision of an additional right-turn lane from Beecroft Road southbound into Carlingford Road. Stage 2 works involve the widening of Epping Road between Essex Street and Blaxland Road to provide an additional westbound traffic lane. The works undertaken by RMS will improve traffic flows around the site, reduce congestion (through new turning and slip lanes) and improve broader pedestrian access in the area around the site and nearby Epping Town Centre.

The provision of the two separate access and egress points to the site and the road network upgrade works being carried out by RMS will help address the increased traffic volumes that will be generated by the development.

Further to this, the future DAs will be required to provide additional detailed assessment of traffic impacts that relate to the relevant stage of the concept proposal.

6.1.2. Parking impacts

A number of submissions raised concern that the concept proposal provides inadequate parking and will put pressure on the existing on-street parking supply.

Response

The car parking provisions are generally consistent with the parking rates in the HDCP 2013 (amended in May 2019) and the RMS Guide to Traffic Generating Developments for Metropolitan Regional (CBD) Centres. The proposed number of car parking spaces also complies with the recommended residential car parking rates outlined in the Epping UAP Structure Plan of one car parking space per dwelling and one visitor car parking space for every 10 dwellings.

However, it is acknowledged that higher visitor parking rates (i.e. 1 space per 7 units) were requested by a number of respondents. As a result, the concept proposal has been amended to provide a minimum of 62 visitor parking spaces (based on 1 space per 7 units for 432 dwellings) and 270 resident parking spaces (which still comply with HDCP 2013 maximum rates, with Council's intent to minimise residential parking provision). The latest scheme also includes three car share parking spaces, 14 motorcycle spaces and 476 bicycle spaces.

The development is strategically located within 400 metres of Epping Station, which provides easy connections to the Sydney metropolitan network and Sydney Metro Northwest. The Epping Town Centre is serviced by numerous bus routes to existing employment centres such as Parramatta and Macquarie Park. The car parking provisions will support the use of public transport, reduce reliance on private vehicle use and encourage active transport for local trips including walking and cycling.

Car parking is addressed in further detail at Section 5.3.3.

6.2. Building height and scale

Summary of issues raised

Submissions raised concern in relation to the height and scale of future buildings on the site. The submissions noted the proposed building heights and queried the possible overshadowing, loss of privacy and visual impacts. The submissions also noted that there would not be sufficient opportunity for on-site landscaping.

Response

As stated in the EIS, Epping Town Centre is currently experiencing high growth and transformation as a result of the delivery of the Sydney Metro Northwest and the rezoning undertaken as part of the Priority Precinct process. The surrounding skyline is rapidly transforming and will result in a varied built form outcome with building heights ranging between 15 to 45 storeys, particularly on the western side of rail corridor.

The concept proposal establishes a maximum building height envelope of 48 metres, which will allow for buildings of up to 15 storeys (approximate). The building envelope has been developed following thorough consideration of the site, its location and context to the surrounding locality including the vision for a revitalised Epping Town Centre. Further, the proposed building envelope complies with the Epping Town Centre UAP Structure Plan which envisioned future mixed-use buildings of up to 15 storeys on the site as well as the height controls set out under the HELP 2013.

The building height and scale sought as part of the concept proposal is considered justified as:

- it is fully compliant with the building height controls for the site under the HLEP 2013
- it is compliant with the strategic planning work undertaken by the NSW Government to provide for increased residential densities in proximity to the Epping Town Centre
- it provides an appropriate transition in building heights extending outwards from the Epping Town Centre core, providing a lower scale in comparison to the taller buildings in the core
- it includes a lower scale (5 storeys) podium to Beecroft and Ray Roads, providing a more appropriate relationship to surrounding, lower developments
- the height is consistent with the current controls and transitions appropriately with the future built form character of the surrounding area which comprises of a varied skyline including a range of multi-storey buildings of varying height
- it allows for future detailed design and architectural creativity (such as building modulation) that will result in high quality built form
- it will not result in adverse overshadowing of adjoining residential properties
- it achieves compliance with the ADG and SEPP 65 requirements
- it allows for the maximisation of landscaping, communal and private open space
- the views and vistas to the site from the surrounding road network and public domain areas will not be significantly impacted.

Further to the points above, the built form and design of future structures will be subject to additional detailed assessment as part of future DAs.

6.3. Affordable Housing

Summary of issues raised

Concerns were raised about the allocation of Affordable Housing as part of the proposal.

Response

The Affordable Housing offering proposed as part of the concept proposal is consistent with Landcom's *Housing Affordability and Diversity Policy* (September 2017) which sets out a target of 5-10% of new homes as Affordable Housing across each project. In accordance with the Policy, individual projects will determine the appropriate target for Affordable Housing based on the opportunity and characteristics of the project. The allocation of Affordable Housing proposed as part of the concept proposal is addressed in more detail at Section 5.2.1.

6.4. Open Space

Summary of issues raised

The proposal provides insufficient open space and lacks amenity for the residents of the proposed new towers.

Response

The concept proposal has been amended to provide additional deep soil areas from 2,063m² to 2,200m². Further, the development will include 2,710m² of communal open space to be provided in courtyards between the residential flat buildings, as terraces on the rooftop of the two podium structures linking the residential flat buildings and the rooftops of the buildings.

Additionally, the proposed through-site pedestrian link through the centre of the site has been redesigned to provide a wider, publicly accessible link between Beecroft Road to Ray Road. The landscaped through-site link will facilitate convenient movement across the site, allow for passive surveillance of open spaces from residential apartments and provide ground level activation.

6.5. Land Use

Summary of issues raised

A number of concerns were raised that the proposal is not achieving optimal land use based on its strategic location. Public submissions emphasise that the Epping Town Centre requires local jobs and services for the future and the allocation of more non-residential GFA can achieve this.

Response

The site is strategically located in proximity to the Epping Town Centre and complements the strategic planning work by the NSW Government by facilitating future high-density residential development on a site that is in close proximity to public transport and services.

The concept proposal, as presented in the EIS, sought approval for around 39,000m² of residential land use and around 700m² of non-residential land use for facilities or services to meet the day-to-day needs of residents. The land uses proposed as part of the concept proposal are consistent with the site's R4 High Density Residential land use zone.

Amendments proposed to the through-site pedestrian link has resulted in minor changes to the building envelopes and proposed land uses including a reduction of residential GFA to around 37,700m² in total and an increase in the amount of non-residential land use to 752m² in total.

Hill PDA were engaged by Landcom to consider the issue of commercial floor space and economic impacts on the viability of the Epping Town Centre (Appendix C). Key findings of the Hill PDA assessment include the following:

- the site's recent rezoning to R4 High Density Residential was not intended to accommodate large scale office and business uses
- the site would struggle to compete with higher-order nearby commercial centres which offer significant competitive advantages
- the site is not of sufficient scale to make development attractive for many prospective office tenants, particularly given its fringe location in a predominantly residential location
- the site is located outside of the Epping Town Centre with Carlingford Road being a significant barrier to the town centre
- the distance from Epping train station is a significant deterrence for prospective commercial and retail tenants, particularly tenants that rely on high accessibility and passing trade
- increasing the commercial floor space on the site would potentially result in additional traffic and congestion on an already constrained intersection.

The Hill PDA assessment is discussed in further detail at Section 5.2.1.

6.6. Development context

Summary of issues raised

Public submissions raised concerns around the financial interest of the proposal as being profit driven.

Response

The NSW Government endorsed the Epping Town Centre as an area of focus in October 2012. This followed the announcement of the construction of the North West Rail Link (now Sydney Metro Northwest), and the release of the 2011 Epping Town Centre Study. The area provides good access to many employment and education destinations across Sydney with great access to state of the art transport and is ideally located for residential development.

Development of the site will be subject to future DAs that will be subject to Council's development contribution requirements under the *City of Parramatta Council Section 94 Development Contributions Plan*. The required contribution amount will be determined based on the total cost of the relevant stage of the development and will be applied towards meeting the cost of the provision or augmentation of new public facilities, including:

- community facilities
- drainage, water quality and laneway infrastructure
- natural environment
- open space and public recreation
- public domain
- roads and shared paths.

6.7. Infrastructure provision and development

Summary of issues raised

Concerns were raised that the increased population arising from the proposal will put undue strain on infrastructure, including roads, schools and other services. It was noted that infrastructure is already stretched, and that further development should not proceed until adequate infrastructure is in place.

Response

The Epping Town Centre was endorsed by the NSW Government as a Priority Precinct (formerly known as Urban Activation Precinct) in October 2012 following the announcement of the construction of the Sydney Metro Northwest. The Epping Town Centre will play an important role in meeting Sydney's future growth needs by delivering housing and jobs in areas with access to public transport and services.

Following its announcement as a Priority Precinct, the NSW Government endorsed the rezoning of 54 hectares of land within the Epping Town Centre precinct to provide for a mix of uses, including high density residential, commercial and retail uses. The rezoning aligns with the NSW Government's investment in transport infrastructure that will service the local area including the Sydney Metro Northwest.

The concept proposal supports the NSW Government's endorsement of the Epping Town Centre as a Priority Precinct as it will provide new homes close to public transport and other essential services.

Impacts on the existing road network infrastructure have been addressed in the Traffic and Transport Study and Traffic (provided in the EIS), Section 5.2.5 of this report and in the Transport Memorandum (refer Appendix D) prepared by SCT Consulting. Impacts on the road network will be subject to further detailed assessment as part of the future DAs for the site.

6.8. Epping Civic Trust

6.8.1. Land Use

Summary of issues raised

The Epping Civic Trust raised concerns about the ratio of floorspace for residential uses to commercial and non-residential uses. The major issues raised concerned the low quantity of non-residential floor space and the impact it has on availability of retail, services and employment opportunities.

Response

The site is strategically located in proximity to the Epping Town Centre and complements the strategic planning work by the NSW Government by facilitating future high-density residential development on a site that is in close proximity to public transport and services.

The concept proposal, as presented in the EIS, sought approval for around 39,000m² of residential land use and around 700m² of non-residential land use for facilities or services to meet the day-to-day needs of residents. The land uses proposed as part of the concept proposal are consistent with the site's R4 High Density Residential land use zone.

Issues relating to land use and the provision of non-residential floor space are more comprehensively addressed in the Hill PDA assessment (Appendix C) and at Section 5.2.1, Section 5.3.2 and Section 6.5.

6.8.2. Traffic, parking and access

Summary of issues raised

Issues were raised regarding the existing traffic in proximity to the site and the potential traffic congestion that will arise as a result of the new development, including during its construction phase. The Epping Civil Trust is concerned with the traffic generation resulting from increased pedestrians crossing Carlingford Road, suggesting further infrastructure and public amenity improvements are required.

Response

The Traffic and Parking Technical Memorandum (Appendix D) notes that vehicular access to the development is proposed at Ray Road and Beecroft Road. Both access points are interconnected via the internal car park. The western access on Ray Road functions as a shared access for residential (visitors and non-visitors), non-residential and loading traffic.

The eastern access is a dedicated residential (visitors and non-visitors) access at Beecroft Road. Appropriate wayfinding signs are recommended internally within the car park to guide visitors to the dedicated visitor car parking spaces. Wayfinding will be further refined as part of the future DAs for the site.

Issues relating to traffic, parking and access are comprehensively addressed in the Traffic and Parking Memorandum (Appendix D) and at Section 5.2.5, Section 5.3.1, Section 5.3.3 and Section 6.1.

6.8.3. Affordable Housing

Summary of issues raised

The Epping Civil Trust is concerned with the proposed minimum percentage of Affordable Housing. The Trust requests the government owned land address the lack of Affordable Housing in the area by mandating a higher minimum percentage of Affordable Housing.

Response

The concept proposal provides for a minimum of 5% of future residential dwellings to be designated as Affordable Housing. The management of Affordable Housing will be undertaken in partnership with a registered Community Housing Provider.

The Affordable Housing offering proposed as part of the concept proposal is consistent with Landcom's *Housing Affordability and Diversity Policy* (September 2017) which sets out a target of 5-10% of new homes as Affordable Housing across each project. In accordance with the Policy, individual projects will determine the appropriate target for Affordable Housing based on the opportunity and characteristics of the project.

The total number of Affordable Housing dwellings will be determined as part of the future DAs for the site.

The provision of Affordable Housing as part of the concept proposal is also addressed at Section 5.2.1.

6.9. Member for Epping, NSW Treasurer – Dominic Perrottet MP

6.9.1. Affordable Housing

Summary of issues raised

The Member for Epping raised concerns that the proposed 5% allocated to Affordable Housing is not enough to meet future demand. Council's *Affordable Rental Housing Policy 2019* states that 10% should be the minimum amount dedicated to Affordable Housing in developments such as these.

Response

The provision of Affordable Housing as part of the concept proposal is addressed at Section 5.2.1. It is noted that the minimum amount of Affordable Housing set out in Council's Affordable Housing policy (10%) is a guide and not a mandatory requirement for new development. The total number of Affordable Housing dwellings will be determined as part of the future DAs for the site.

6.9.2. Land Use

Summary of issues raised

Concerns are raised regarding the provision of non-residential land use which will not meet the needs and demands of the community.

Response

Issues relating to land use and the provision of non-residential floor space is comprehensively addressed in the Hill PDA assessment (Appendix C) and at Section 5.2.1, Section 5.3.2 and Section 6.5.

6.9.3. Open Space

Summary of issues raised

Concerns are raised that the provision of open space is inadequate to meet the needs of the future residents and it is a missed opportunity to provide additional open spaces for the population of Epping.

Response

Issues relating to open space provisions are addressed at Section 5.3.5 and Section 6.4.

6.9.4. Traffic, parking and access

Summary of issues raised

The proposal will see an increase in traffic, particularly between Epping Station and the M2 exit.

Response

Issues relating to traffic, parking and access are comprehensively addressed in the Traffic and Parking Memorandum (Appendix D) and at Section 5.2.5, Section 5.3.1, Section 5.3.3 and Section 6.1.

7. Response to submissions and conclusion

7.1. Changes

A number of changes have been made to the concept proposal to address issues raised in submissions, summarised below:

- **Pedestrian through-site link** – The through-site link has been redesigned as a wider, publicly accessible pedestrian link between Beecroft Road and Ray Road. The Ray Road building has been shortened to accommodate this change.
- **Non-residential uses** – Non-residential uses have been redistributed to sit adjacent to Beecroft Road and the new through-site link. An additional 52m² of non-residential GFA is included, increasing from 700m² to 752m² in total. A floor to ceiling height of 3.3 metres has been provided for the non-residential uses by lowering the ground level of the proposed development.
- **Reduced residential yield and GFA** – The number of residential dwellings is reduced from 442 to 432 in total as a result of the through-site pedestrian link. The reduction in residential yield has resulted in an overall reduction of the residential GFA on the site from 39,000m² to around 37,700m².
- **Deep soil** – additional deep soil planting areas are included across the site, increased from 2,063m² to 2,200m² in total.

Table 4 provides a comparison of the key features of the concept proposal as exhibited with the amended concept proposal.

Table 4: Comparison of original concept proposal with amended concept proposal

Item	SSDA Submission	Concept proposal as amended (RtS Report)
Residential GFA	Around 39,000m ²	Around 37,700m ²
Non-residential GFA	Around 700m ²	Around 752m ²
Total dwellings	442	432
Building height	Up to 48m (15 storeys)	No change
Total car parking	356 spaces	332 spaces

7.2. Conclusion

This RtS Report has been prepared to satisfy the provisions of Section 4.39 of the EP&A Act and Section 85A of the EP&A Regulation. All submissions received during the EIS exhibition period have been carefully considered. Additional information has been provided and amendments made to the concept proposal to address issues raised in submissions where required.

The concept proposal is an appropriate development for the site and is in the public interest as it is consistent with the applicable zoning and development controls and aligns with the NSW Government's priorities relating to housing affordability, local infrastructure delivery and economic development.

The concept proposal supports best practice transit-oriented design, providing increased residential density in immediate proximity of the new Epping Station. The proposed infrastructure upgrades will provide residents with greater access to public transport and employment options, while promoting the use of sustainable travel options.

It is concluded that the concept proposal is appropriate for the site and should therefore be approved.