

Attachment E
Response to the City of Parramatta Council's key issues (SSD 8784)

Council Comment	Response
<p><i>Council staff have reviewed the Response to Submission Report by Landcom (November 2019) and consider that the key concerns raised in Council's submission have not been adequately addressed and therefore Council strongly maintains its objection to the current proposal.</i></p> <p><i>In summary key areas which the proposal should address are as follows:</i></p>	
<p><i>1. As a Government organisation, Landcom should be a leader in implementing NSW Government metropolitan planning policies, including supporting Epping as a Strategic Centre. The provision of commercial floorspace on the site is consistent with Epping's role as a Strategic Centre as identified in the Greater Sydney Commission's (GSC's) Metropolitan Region Plan and Central City District Plan, and this Government owned site provides Government with an excellent opportunity to lead in delivering employment opportunities in accordance with the GSC's plans.</i></p>	<p>The development is consistent with the NSW Government's strategic planning plans and policies, including the <i>Greater Sydney Region Plan</i> and the <i>Central City District Plan</i>. The proposal supports the planning priorities, actions and objectives within these plans and contributes to Epping's role as a Strategic Centre by:</p> <ul style="list-style-type: none"> • adding to Epping's dwelling targets including the delivery of 432 new dwellings with a minimum of 5% being affordable housing, improving housing supply and choice on a site that is well located in the Epping Strategic Centre • delivering dwellings in an area that benefits from excellent public transport access and will be serviced by major rail lines including the Sydney Metro Northwest • contributing to the public realm through the delivery of communal open space and a pedestrian through-site link • contributing to the integration of land use and transport planning and the aspiration of a 30-minute city from people's place of residence • contributing to amenity and walkability of the centre through high quality design outcomes.
<p><i>2. As such, the proposal should provide a significant level of additional commercial (business, office, retail) floorspace to support the existing and future populations of Epping Town Centre.</i></p>	<p>Hill PDA addressed the issue of commercial floor space viability in the Response to Submission report. The Hill PDA assessment found there to be approximately 30,000 sqm of non-shop front office space in Epping (mostly located above ground level) with a current high vacancy rate of around 24%. Further, the assessment found that there has been a withdrawal of office space in the Epping Town Centre in recent years as a result of:</p> <ul style="list-style-type: none"> • changes in the economic climate

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	<ul style="list-style-type: none"> • 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 <p>The Hill PDA assessment confirmed that the demand for office space in Epping from larger companies and institutional investors is very weak, with investors preferring 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 additional Hill PDA advice (Attachment F) considers potential uses that would succeed on the site including a small format supermarket (i.e. IGA express format), Chinese store, medical uses, café/restaurant or personal services (i.e. hairdressers or dry cleaning services).</p> <p>Therefore, the site is not considered suitable for large-scale commercial uses. The smaller offering of non-residential uses on the site is considered appropriate for smaller-format commercial operations to service the future on-site population.</p> <p>The HillPDA advice concludes that <i>the proposed level of non-residential GFA of 750 to 1000 sqm on the ground floor can feasibly accommodate a range of retail and other uses and is therefore appropriate on the subject site.</i></p>
<p>3. Council's Epping Town Centre Traffic Study identified the provision of a link road through the site will take pressure of key intersections in the peak periods in the long term, coupled with a suite of traffic improvements. The traffic response contained in the application is a site focused response and does not provide adequate traffic model to support its arguments. Council requests that the link road be provided as part of the proposal.</p>	<p>The provision of a link road through the site has been addressed in the EIS and RtS documents.</p> <p>The RtS included a comprehensive review by Complete Streets on a viability of a link road through the site. The findings of the review concluded that:</p> <ul style="list-style-type: none"> • an east-west link road through the site 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 east-west link road through the site 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.

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	<p>Based on the advice received from qualified traffic and transport consultant reports, Landcom is of the view that there would be no sustainable public benefit would be achieved in providing an east-west link road through the site. A through-site pedestrian link that provides open space and safe walking access through the site is found to provide positive placemaking outcomes and will facilitate east-west movement of pedestrians between Beecroft Road and Ray Road.</p>