

## **State Significant Development Application (SSD 8784) 242-244 Beecroft Road, Epping**

### **Key Concerns**

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.

In summary key areas which the proposal should address are as follows:

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.
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.
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.

### **Response to Submissions**

Please find below Council staff's response and clarification on the following matters:

- Provision of Commercial Floorspace (response to Hill PDA letter);
- Provision of an East-West Link Road between Ray and Beecroft Roads;
- Clarification of dedication of affordable housing units;
- Car parking provision - including clarification of visitor parking rates; and
- Design concerns in relation to the Public Link.

Please note this response is has been prepared by Council staff and not endorsed by Council. The response is consistent with Council's submission to the SSD of 18 September 2019.

### **Provision of Commercial Floorspace**

The applicant's revised concept proposal following the Response to Submissions provides a slight increase in non-residential gross floor area from 700 squares to 752 square metres. The position of Council officer's submission (18 September 2019) remains the same and the concept proposal should provide a significant increase in commercial floor space, as the current level proposed is inadequate.

Council officer's note that commercial floorspace is defined as floorspace utilised for retail, office or business premises.

The applicant has engaged HillPDA consultants (Appendix C of the Response to Submissions Report) to prepare a response to issues raised in public submissions relating to the lack of commercial floorspace. HillPDA assessment concludes that only small-scale retail and commercial floorspace (less than 1,000sqm) should be provided in the proposal concept due to (in summary):

- 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 prospective office tenants, particularly its fringe location in a predominately 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 tenants.
- An increase of commercial floorspace would potentially result in additional traffic and congestion.

In response to HillPDA assessment, Council officers raise the following key points in addition to the reasons put forward in Council officer's original submission:

- a) The site is considered to be part of Epping Town Centre**
- b) Delivering commercial floorspace meets long term needs and the benefits are far reaching.**
- c) There is demand for commercial floorspace within the Epping Town Centre.**
- d) The proposal has capacity to deliver a variety of commercial uses (retail, business or office premises).**

The above points are discussed in more detail below. As outlined in Council's submission on 18 September 2019, the Epping Town Centre Commercial Floorspace Study (SGS Economics and Planning, 2017) which was prepared as part of the Epping Planning Review is a key supporting document.

- a) The site is considered to be part of Epping Town Centre and commercial floorspace will support its viability.**

The site is in a highly accessible location and is part of the concentration of housing, retail, business and office uses within the Epping Town Centre. Council officer's dispute the site being categorised as 'outside' or on the periphery of the town centre by the applicant as an argument for not providing additional commercial floorspace.

The traditional meaning of a 'town centre' is the commercial and geographical centre of a town, often at the centre of a major public transport hub. The distance of the site from

Beecroft Road pedestrian bridge (adjacent to Epping Station) is between 270 metres (southern edge) and 420 metres (northern edge), which is within a 5 minute walking catchment. Although Carlingford Road is a busy road, there is adequate crossing points for pedestrians and there is significant surrounding population to the north and west of the site. An argument could also be presented that the railway line and Beecroft Road present significant constraints to the accessibility of retail and commercial for the eastern side of Epping, however both eastern and western side of the railway line have thriving retail and commercial activity.

The HillPDA report argues that the Epping Town Centre is defined by the B2 Local Centre zoning. Council officers believe the subject site is part of the geographical and commercial core of the Epping Town Centre. Its close distance from a major public transport hub and its former use as commercial premises demonstrates its legitimacy as a town centre site. Furthermore, due to its town centre location, the Department of Planning's Urban Activation Precinct process resulted in this site receiving density uplift in 2014.

**b) Delivering commercial floorspace meets long term needs and the benefits are far reaching.**

The HillPDA assessment argues that other sites within Epping are better placed to accommodate commercial floorspace, however Council officers consider this a short term view of the growth of Epping. It is estimated that Epping will have between 8,755 and 10,000 additional dwellings by 2036 (City of Parramatta, Draft Local Housing Strategy, 2019). Given this significant population increase, Epping needs to play a more significant role than other nearby centres, which meets the needs of local residential population as well as providing higher order services and commercial space.

It is critical that provision for non-residential uses plans be made now so as to meet the long term needs of a centre and communities. Once spaces are converted to residential development it is difficult and unlikely to be changed back to support such uses should demand for this space changes over time. The benefit of delivering commercial floorspace in the Epping Town Centre are far reaching and include:

- Upholds the 30 minute city, which is a key planning policy of the Greater Sydney Commission, where more services and jobs should be available close by to residents and reducing the need for travel;
- Supports and maximises the long term investment in public transport and road infrastructure within centres (e.g. the newly open NorthWest Metro);
- Maintains an employment base in the centre, to ensure day time activity and supports retail trade and other businesses;
- An established commercial centre is likely to attract further businesses to the area, as locating in an area dense economic activity allows for economies of scale and access to larger customer base for business.

### **c) There is demand for commercial floorspace within the Epping Town Centre**

Council's Epping Town Centre Commercial Floorspace Study (the 'Study') analysed market trends, economic and population profiles and current retail and office environments and undertook industry consultation. The Study noted that Epping's population growth (in terms of access to a larger customer catchment and workforce) coupled with excellent public transport access and connectivity, means Epping is, and will, continue to be a popular centre for business. It concluded that the role of Epping as a town centre will be to provide high quality retail and services that meet the needs of the local population as well as providing higher-order services and commercial space for small to medium businesses.

Epping currently has a higher proportion of knowledge intensive industries and jobs in health and education compared to Sydney overall. The Study identifies that there may be opportunities to capitalise on this concentration in the types of spaces included in future development. Industry research undertaken by the Study revealed that tenants are usually small business who are looking for space within the Epping Town Centre generally need floorspace of less than 200 square metres. These types of businesses are medical centres, finance and accounting practices, or real estate agents etc. HillPDA's assessment has concluded the same from their own research.

In relation to retail and business uses, the Study noted that expected growth in population of the Epping Town Centre is likely to drive the need for uses that support the population such as gyms, childcare, health centres, food and drink premises and educational facilities and civic services (with current demand from childcare centres and gyms and cafes). These services are important to support the ongoing viability and functionality of the centre.

The current B2 Local Centre zoning (as rezoned in 2014 through the Department of Planning's Urban Activation Precinct process) has to date facilitated the delivery of a significant level of housing, at the expense of commercial floor space. Recent developments and development applications have been for primarily housing, reflecting the market's highest and best use. Consequently, Epping has experienced a significant decline in commercial floorspace, including large scale office towers and small scale (2 and 3 storey) office development and only maintaining the existing amount of retail space. The Study noted there is a risk that the current high-level demand for residential development will limit the space that is available for these types of community-serving uses that are required for centres to function effectively over time.

As stated in Council's previous submission, the provision of commercial floorspace in Epping is currently a policy priority for Council. Council has engaged consultants to undertake a traffic study which is exploring the impacts of amendments to planning controls to mandate a minimum provision of commercial floorspace for sites within Epping Town Centre.

### **d) Delivery of additional non-residential space can be achieved on the site**

The Hill PDA report which identifies a demand within Epping for secondary commercial space focussed on providing services to the local population, including finance and

accounting, medical practices, dental surgeries and real estate etc. Council's assessment supports this assertion.

As stated in Council's submission, the site should provide a minimum provision of 1:1 FSR of commercial uses (approximately 10,120sqm), for the following key reasons:

- the size, location and access to the site is ideal for commercial uses;
- the provision of commercial floorspace is consistent with Epping as a Strategic Centre as identified in the Greater Sydney Commission's Metropolitan Region Plan and Central City District Plan; and
- It is a Government owned site and provides an excellent opportunity to deliver employment opportunities and should lead in the implementation of the metropolitan plans.

The site is of a substantial size that it could easily accommodate this amount of commercial floor space. The commercial floor space may range from small to medium sized offices, as well as supportive quality retail offerings such as food and drink premises and small supermarket etc.

Furthermore, Beecroft Road is a busy road, with average daily traffic 15,000 vehicles per day (Source: Transport for NSW's Traffic Volume Viewer, 2019). A busy road is not ideal for residential uses due to noise and amenity and therefore the provision of commercial premises would provide a buffer from the impact of the road.

### **East-West Link Road**

The Council submission requesting the concept scheme be revised to include an east-west road link (parallel to Carlingford Road) through the site between Beecroft Road and Ray Road still stands. The provision of this new link road will improve the traffic delay conditions at Carlingford Road / Beecroft Road and Carlingford Road / Ray Road / Rawson St intersections and therefore contribute to stabilising the existing traffic impacts in the long term. By providing the east-west link, this will increase permeability in the road network which will relieve pressure on these intersections. The Traffic Study also assumes that other planned network upgrades also occur by 2036. A list of improvements and the traffic benefits of the link road are detailed in the Epping Town Centre Traffic Study.

Council's Epping Town Centre Traffic Study is a holistic and comprehensive study of the traffic network, as it evaluates traffic impact based on current and future growth and the whole precinct's road network. The applicant's traffic response a site focused response and does not provide adequate traffic model to support its arguments.

### **Affordable Housing Units**

Further to Council's submission, affordable housing units may be transferred to or dedicated to a Tier 1 Community Housing Provider. It is preferable that the Department impose an appropriate condition of consent to reflect this, particularly if it is Landcom's intention to sell the site prior to redevelopment.

### **Car Parking Provision**

The proposal is revised to provide minimum 62 visitor parking spaces (based on 1 space per 7 units for 432 dwellings) and maximum 270 resident parking spaces in accordance with the Hornsby DCP 2013 rates. In addition, off-street parking for the non-residential component of the proposed development is to be provided in accordance with the Table 1C.2.1(e) of the Hornsby DCP 2013. Details are to be illustrated on the plans submitted with the final development application. Council staff support these amendments.

The proposal to provide adequate bicycle parking, motorcycle parking and car share parking spaces is in accordance with the Hornsby DCP 2013, which is supported. A Green Travel Plan is also recommended to be provided.

By way of clarification in relation to visitor parking rates, Council's amendments to car parking rates in Epping Town Centre were made in May 2019 (refer Hornsby DCP 2013 Section 1, Table: 1C.2.1(e) On Site Car Parking Rates (Epping Town Centre Core)). For residential flat buildings the visitors parking spaces were increased (from 1 space per 10 units to 1 space per 7 units) within 800 metres of Epping railway station, to align with RMS rates. The visitor parking rates contained in the DCP will ensure that visitor parking does not overflow on to the street.

### **Pedestrian Link**

There is a Relative Level (RL) difference of approximately 5.5 metres from Beecroft Road to Ray Road, which presents access challenges along the proposed pedestrian link. Council staff have reviewed the Urban Design Drawings and raise the following concerns:

- the stairs and ramp design results in a fragmentation of landscaped areas;
- the ramp system is long and could be rationalised;
- the ramp system does not correlate closely with building foyers / entrances;
- stairs and ramp system conclude at Beecroft Road end together which is not compliant with Australian Standards; and
- It is unclear how ramp can be accessed from Ray Road footpath.

Council staff recommend the following design considerations:

- Potential separation of staircase and ramp will simplify the levels at landings (allowing for consistent ramp runs and flights), and could reduce the total length of ramps. It also may result in more consolidated landscaped area and consistency of grading for ramps;
- Further consideration of how the path of travel for the ramp will terminate in close proximity to entrances;
- Public stairs and ramps leading from footpaths to the ground floor level will require handrails to both sides of the stairs flights and ramp sides; and
- Provision of the RL plans to ensure compliant ramp design.

Further to ensure that car parking does not dominate the street and that there is at grade pedestrian access from the street into buildings, the buildings will need to follow the slope by stepping down the street.