

Epping Resident

28 August 2019

Department of Planning and Environment
GPO Box 39
Sydney NSW 2000

To whom it may concern

Submission for SSD 8784 at 242-244 Beecroft Road, Epping NSW 2121

Thank you for the opportunity to make a submission in relation to the Concept State Significant Development Application (SSDA) for 242-244 Beecroft Road, Epping NSW. I do not support this SSDA. It is not in the public interest and is promoted on a number of false premises and as such should be rejected. The state Government should create an overall strategic plan for the Epping Town Centre, committing significant funding, before the sale of this site can be considered.

This SSDA does not help to make Epping more liveable, sustainable and economically viable. This site did and should continue to provide commercial floorspace. I think it is now be more financially viable to sell this site zoned as B2 for commercial use rather than its R4 zoning for residential. This also represents more prudent planning for the future to provide business opportunities in a variety of locations. Just think if Macquarie Park was destroyed/bombed or had a long-lasting power failure then wouldn't alternative sites for businesses in Sydney, such as at Epping, be a good thing to have.

Details of my reasons for objecting include:

Lack of proper pedestrian connectivity to public transport – putting people at risk

Are you aware the Epping bridge widening will require bus stops on Beecroft Road to be moved closer to this site along Beecroft Road and/or to Rawson Street? Either way this will generate more bus movements and pedestrian activity closer to this site on Carlingford Road and along Beecroft Road. The local community is currently advocating/lobbying to keep the accessways from Rawson Street to Beecroft Road open, as the City of Parramatta Council plans to sell the laneways, which currently provide accessways, into private ownership. So, at this stage there is no guarantee that residents will be able to access the train station from Rawson Street. This will result in the footpaths, used by pedestrians from this development, becoming very crowded and dangerous. There needs to be an overall strategic plan to manage this.

Given this is a SSDA the State Government needs to look at the whole picture and have proper planning for pedestrian connectivity. This should include a foot bridge connecting this site to either the walkway over Beecroft Road to the train station or to future accessways (locations currently unknown) in developments in Rawson Street. It will not be feasible to have the level of pedestrian movement this SSDA will generate interrupting the traffic flow at Carlingford Road. The existing pedestrian bridge over Beecroft Road will also be inadequate and will require widening.

At the very least the footpaths to give access to this site will need widening. This needs to be completed very soon before the developments proposed for the western side of the Epping Town Centre are approved and the Epping railway bridge is widened. NB No local residents whom I know support this bridge widening. While it is alleged to help passing through traffic it does nothing for the local community's traffic.

Inaccurate premise: The SSDA's Traffic study (page 27), states that residents from this complex will be able to get to the train station in eight minutes. I dispute this. Firstly, this is based on the assumption they will cross at the Carlingford Road/Ray Road intersection. However, if pedestrians cross at the alternative location, the Carlingford Road/Beecroft Road intersection it takes about eight minutes for the pedestrian lights to go green so it will take more than 8 minutes. Secondly as the traffic increases there will be a greater delay for pedestrians crossing Carlingford Road.

No business case for this SSDA

The lack of a proper business case to show this SSDA offers the most financially viable option for the sale of this land is not in the public interest and may be robbing the New South Wales tax payers of funds which are required for infrastructure.

The NSW Department of Planning and Infrastructure, *Epping Town Centre Urban Activation Precinct Structure Plan*, March 2013 (page 14) notes failure to adequately provide the right floor space ratio (too much or too low amounts) can result in no redevelopment occurring. Development in Epping at a number of sites has already stalled and no development is occurring. We are also seeing the residential property market stalling throughout Sydney. So, is it prudent for the State Government to enforce another 442 dwellings on Epping in a residential property market which is already struggling? Epping is also easily meeting the additional dwelling targets without this development.

Inaccurate premise: The proponent is relying on a financial study which was used to justify rezoning the site in 2014 to demonstrate there will be more profit to be made from residential property as opposed to commercial. This Hill PDA financial study used, *Epping Feasibility Analysis of Key Sites*, was completed in September 2012 and signed March 2013. The residential market in Sydney, and especially Epping, has changed significantly since 2012. A study completed now is likely to give different results.

I also note that the *Epping Feasibility Analysis of Key Sites* study used to determine that this site should be R4 rather than B2 zoned records in the conclusion there were 'large divergencies in comparable sales data' which indicated a 'complex market' for developers to navigate in amalgamating sites. Given these divergencies and complexities in 2012, how does the State Government know how the market is now performing in 2019?

Challengeable premise: The *Environmental Impact Statement 7.7* (page 52) records the development 'is expected to encourage a significant number of walking trips between local services.' This is likely to be impossible as there will not be any commercial space in which to provide local services. This means residents will need to access services by car or public transport rather than by walking trips.

Challengeable premise: The *Epping Town Centre Urban Activation Precinct Structure Plan* notes the demand for commercial/office floor space in Epping would 'continue to reduce' due to competition from specialist business park centres such as Macquarie Park and Norwest Business Park. This is short sighted planning by the State Government. When the other business park centres become saturated then Epping will provide a perfect addition as it is located at the intersection of several train lines and will have many residents looking for employment. Epping needs more workers for the local retail to remain viable during the day time.

Not in keeping with the Greater Sydney Commission vision for the River City

The Greater Sydney Commission's vision for the River City is to ensure residents have quicker and easier access to a wider range of jobs, housing types and activities. Where is this SSDA creating jobs

to support the GSC's vision? We need more jobs in Epping. The dwelling types on offer are also rather uniform rather than providing variety such as more town houses.

The Greater Sydney Commission's Objective 12: Great places that bring people together includes creating places which will attract residents, workers, visitors, enterprise and investment. This SSDA does none of these things. It offers nothing to attract people to Epping. Its bulk and scale represent overdevelopment of the site, it does not provide office space for workers, accessibility is difficult including when driving and there is nothing worth investing in. It continues to demonstrate lack of planning and inadequate funding for infrastructure in Epping, as is already demonstrated well on the eastern side of the Epping Town Centre.

As noted in the *Environmental Impact Statement* (page 57) the Greater Sydney Commission gives Epping the status of Strategic Centre. The Epping community continues to want to learn how the GSC and the State Government intend to support Epping to be a Strategic Centre. To date this only seems to mean Epping is a suburb on the train lines into which more people can be crammed to live, without consideration for its liveability or job creation. Epping has the capacity to be so much more than a transport hub.

This site should be used to address Epping's need for more commercial space

Please see the Northern District Times article, *Win for business*, 10 January 2018 which refers to the commercial use to be explored at this key Epping site. This states the State Liberal MP Damien Tudehope (at that time) and Parramatta Council raised concerns about considering this site for commercial use. The Epping Chamber of Commerce president was also quoted as calling on the government to reconsider.

The *Environmental Impact Statement*, page 35, acknowledges the findings of the Epping Planning Review, 14 August 2017, which identifies the need for more commercial space, then proceeds to ignore the findings by relying on an older study. Epping's need for more commercial space is well documented in a number of Council documents which are more recent than 2014.

The *Environmental Impact Statement* records this SSDA is to provide,

- *Renewal of surplus government owned land for a more efficient and suitable purpose.*

Providing people with jobs within walking distance and people working near the Town Centre to patronise local retail stores seems a 'more efficient and suitable purpose' than adding to Epping's surplus supplies of residential apartments (which are already slow to sell and lease).

Landcom has advised residents that it cannot provide more commercial space in the current zoning. If the State Government was able to rezone the site from B2 to R4 then why can this not be reversed? The City of Parramatta Council is unlikely to oppose this.

Epping does not have a 'commercial' centre and there is very little commercial space. More commercial space is greatly needed at this site and in Epping's Town Centre Core.

Need to get Roads and Maritime Services consent

The *Environmental Impact Statement* (page 63) refers to this SSDA needing to be referred to the Roads and Maritime Services to obtain the 'general terms of approval'. It is my understanding the Roads and Maritime Services is yet to give approval to allow entry and exit from Beecroft Road and to create the slip road this will require on Beecroft Road. Surely this is a basic approval which should be gained prior to this SSDA being permitted to progress.

Issues with traffic congestion

I dispute that the traffic impact from this complex will be minimal, especially when considering its accumulative affect with other developments proposed for the area. The accumulative effect of the additional 450 to 650 daily car trips with other developments in the area therefore must be considered. Residents are already seeing this accumulative impact in Epping and indeed in Sydney – hence changes to the Council’s parking controls for the Epping Town Centre to decrease car ownership.

The *Environmental Impact Statement* fails to provide up to date data such as the State Government’s current additional dwelling quota for Epping of 5,700 dwellings. Instead it quotes the superseded figure that Epping is to have an additional 3,750 dwellings. So how can this SSDA provide an accurate estimation of the traffic issues, given it does not even acknowledge the dwelling and population increase correctly?

The SSDA’s *Traffic and Transport Study* refers to journey to work (JTW) data collected in 2011 when approximately 1,486 people lived in the three trial zones. Anyone who lives in Sydney knows the traffic has increased considerably since 2011, so any data collected then is now out of date and of little benefit. It is also interesting that the *Traffic and Transport Study* Table 2.2 Household Travel Survey (page 4) shows the Pennant Hills – Epping mode of choice was vehicle (driver) 48% and vehicle (passenger) 21%. This is a high percentage of car users. This SSDA does nothing to address this issue such as providing more local jobs.

Challengeable premise: The SSDA’s *Traffic and Transport Study* states the additional car movements will have no significant impact. The SSDA does not appear to give due consideration to the City of Parramatta Council’s Epping Town Centre Traffic Study, which clearly projects that traffic congestion at the major intersections near this site will become more problematic with delays of 75minutes for one scenario. To allege that this development will not contribute to this is very questionable.

Challengeable premise: The SSDA claims that commercial space would generate more traffic than residential. Where is the evidence for this?

Wind tunnel effect

The wind report indicates this development will create considerable wind even without considering the wind tunnelling effect. This means the NSW State Government expects residents in the 442 dwellings to live, have recreation, walk and queue at traffic lights in a very windy environment. This is not good planning or good governance.

Insufficient schools in the Epping area

The NSW State Government needs to take responsibility to provide schools (both primary and high schools) for the children living in these additional 442 dwellings and the other developments in Epping. Approval of this development will significantly add to the crisis in the lack of adequate educational facilities which families living in Epping are already experiencing.

Additional sites for schools need to be identified and purchased before this SSDA can be determined. Changing the zoning and making this a commercial site would help to alleviate this problem.

Epping needs more public open space

Epping does not have sufficient public domains and public green open spaces to meet the needs of the growing population numbers. There should be planning to address these needs before the SSDA

is determined. This site should be considered as a possible location to provide more public open space.

Social housing

I do not support building residential accommodation at this site. However, in the unfortunate event this Concept SSDA is approved there should be more social housing provided. The State Government has a responsibility to accommodate persons who need housing assistance. The 5% offered is not adequate and should be at least 10% or more.

The SSDA does not have Council support

The City of Parramatta Council does not support this SSDA. The Council continues to have concerns in relation to the site providing insufficient commercial floorspace and its impact on the traffic. This includes the development proposed impeding the Council's plans to create a new road through the site.

It is in the public interest that the State Government gives consideration to the Council's concerns.

Conclusion

As noted in the *Stakeholder Engagement Outcomes* there was discussion in 2017 with the Member for Epping at that time, The Hon Damien Tudehope, who expressed concern with the loss of commercial space at this site. It is unfortunate the State Government does not appear to have given consideration for the former Epping MP's advocacy.

The SSDA does nothing to enhance the liveability, sustainability and economics of Epping, or economic security for Sydney, it shows no regard for the needs of the local community, does not demonstrate it is the best possible use of the site and lacks a business case. Therefore, it should not be supported. Actions should be taken to ensure more current studies are completed to determine the best use of this site.

If Landcom already has a developer lined up to purchase the site for residential accommodation, as per the SSDA, then it is not an open and transparent process. If Landcom does not already have a potential purchaser then it will be interesting to see if the market will support this SSDA. I would anticipate it will be 8 – 10 years, if ever, before it will be considered viable to build apartments at this site. Is this good for Epping? Meanwhile Epping needs more commercial space.

Thanking you for your consideration of this submission. I have not made any reportable political donations in the previous two years.

Your sincerely

Name supplied but not to be published