



PO BOX 271, EPPING 1710

30-8-2019

Submission to the department of Planning, Industry and Environment re

242-244 Beecroft Rd, Epping.

From Epping Civic Trust.

The Epping Civic Trust is a community-based organisation that seeks to safeguard and improve the amenity of Epping as a place to live and work. We have a membership of over 400 people, all of whom are local residents.

The Trust is unhappy about several aspects of this proposal. As this is a key site for the Epping CBD, the Trust would like to see a development which complies with the following guiding principles:

- That maximising residential density is NOT the key determinate for this site
- That there is a substantial amount of retail and commercial development not just residential development.
- That there is a generous area of public open space appropriately landscaped and furnished.
- That there is a target of 15-20% affordable housing delivered through an NGO agency
- That clear proposals for infrastructure and public amenity improvements around Epping are developed before any commitment is given to this project including possible through site road links as identified by Council
- That there is a commitment to a full public review of all major developments proposed for the western side of the railway line before any more are started.

However, that is not the proposal that is now on exhibition. The Trust is opposing this proposed development because it fails the principles above and because we have specific concerns with the plans as documented.

Our concerns are as follows.

1. Recent residential development in terms of the number of dwellings is already well in excess of that which the State Government originally proposed for the Epping precinct. Developments of this nature and size near the Urban Activation Precinct should be put on hold until necessary infrastructure and community facilities have caught up with population growth. This proposal plays down this growth by using figures from 2011 rather than the more recent population estimates in the council's Epping Planning Review of 2016. This is very misleading.
2. Epping needs commercial development in parallel with residential development. This proposal allows for approximately 1.5% of the floor space for commercial uses, which

is effectively none. This continues the deliberate and short-sighted approach of recent Epping developments which have seen more than 10,000 jobs leave Epping and will leave the suburb effectively a dormitory with little retail activation during the day. It should be noted that the Environmental Impact Statement, page 35, acknowledges the findings of the Epping Planning Review of August 2017, which identifies the need for more commercial space, and then proceeds to ignore those findings by relying on a study from 2014.

3. The proposal includes a minimum of 5% affordable housing. In fact, that is a measly 22 units. There has been no affordable housing anywhere else in Epping during this redevelopment. This government-owned land has the chance to address this by undertaking a substantive housing project with an appropriate NGO agency
4. This development will preclude the use of any of this land to ameliorate traffic on the Carlingford Rd/ Beecroft Rd intersection, which an east-west link traffic link through the site may have provided. This link was a key element of the council's Epping Traffic Study.
5. The site is isolated from the Town Centre by busy Carlingford Rd and one of the worst bottleneck junctions in Sydney. How are the 1200 or more residents of these towers to gain access to the Railway/Metro Station? If these 1200 people have to use pedestrian crossing on Carlingford Rd, what effect will this have on the delays in excess of one hour at peak periods that are forecast by the Epping Traffic Study for the Beecroft Rd, Carlingford Rd intersection?
6. The EIS indicates that other massive developments on the western side of the railway line are currently under consideration. These include a 40-storey development at 59-79 Beecroft Rd (700 dwellings) and a 45-storey development at 49 and 53-61 Rawson St (1194 dwellings). Unfortunately, as usual each of these developments is being considered in isolation from the others, but in fact they all affect traffic, infrastructure and community facilities cumulatively. We urgently need a precinct plan which looks at all proposed developments as a whole to work out what Epping will look like in the future.
7. The EIS indicates that traffic from the proposed development will add "less than 1%" to the total traffic volumes on the Beecroft Rd and Epping Rd corridors. This ignores the additional developments in Beecroft Rd and Rawson St, which the EIS estimates will add some 1900 additional dwellings, and this is by no means the sum total of additional dwelling proposals in the CBD. The EIS suggests that the traffic improvements, including a right hand lane off Beecroft Rd onto Carlingford Rd, and an additional lane on Epping Rd approaching Blaxland Rd will improve the situation, but these have already been implemented and were well contemplated by the 2017 Traffic Study which forecast delays at all major intersections around the CBD some as long as one hour and seventeen minutes in morning and evening peak hours. The increased traffic from this development is unacceptable.
8. The only Community open space provided with this development is effectively a small area around the through site pedestrian link between Ray Rd and Beecroft Rd.
9. We are concerned that the schools around Epping are already filled to overflowing. We believe this particularly applies to West Epping School, which would be the closest school to this development, and will just face added pressures.
10. The consent and approvals bodies for each stage of this development are not clearly defined in the EIS. As a State Significant Development, this falls under the Minister for Planning for approval. However, that means this site is not being seen properly in conjunction with other developments, or within the greater context of the challenges facing the Epping Town Centre which the City of Parramatta council are having to

deal with. The Trust would like to see Council front and centre of these approval processes, since we can at least talk to Council people; it is in our experience that it is almost impossible to talk to a State Government officer who has the capacity to make changes to a project.

For these reasons, but primarily because this proposal is just such a failure of both opportunity and vision to be so much better, we oppose this proposal. We urge Landcom, and the State government to go back to the drawing board.

Sincerely,

Janet McGarry,
President, Epping Civic Trust