



Independent Planning Commission  
Suite 15.02, 135 King Street  
SYDNEY NSW 2000

Your Reference	SSD-31576972 and SSD-8784-MOD-1
Our Reference	NCA 2022
Contact	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]

8 September 2023

To whom it may concern,

**RE: Parramatta Council submission on Mixed use development at 242-244 Beecroft Road, Epping (SSD-31576972 and SSD-8784-MOD-1).**

The City of Parramatta Council thanks you for the opportunity to comment on the case referral documents for the proposed built form State Significant Development Application at 242-244 Beecroft Rd, Epping.

Council Officers have undertaken a review of the case referral documents provided and identified the following key concerns remain:

- Building height
- Setbacks and building separation
- Solar access to communal open space

In summary, Council Officers do not support the built form application for 242-244 Beecroft Rd, Epping as Council's previous comments have not been suitably addressed.

Whilst some issues have been addressed, the updated proposal still erodes the approved outcomes of the development, particularly in relation to building height, setbacks and building separation as well as solar access to communal open space. Please refer to the table summary below.

Please note this response has been prepared by Council staff and has not been endorsed by Council.

**Contact us:**

council@cityofparramatta.nsw.gov.au | 02 9806 5050  
@cityofparramatta | PO Box 32, Parramatta, NSW 2124  
ABN 49 907 174 773 | [cityofparramatta.nsw.gov.au](http://cityofparramatta.nsw.gov.au)

Should you have any questions please contact [REDACTED]

[REDACTED] on [REDACTED] or [REDACTED]

Regards,



**David Birds**  
Group Manager, Major Projects and Precincts

Issue previously raised by Council	Has the issue been appropriately addressed?
<p>Building Height:</p> <ul style="list-style-type: none"> <li>• Height exceedance is not minimal</li> <li>• Buildings C and E have some habitable spaces above the height standard</li> <li>• No additional public benefit is within the proposal to justify the impact from the height non-compliance</li> </ul>	<p>Not satisfactorily addressed.</p>
<p>Setbacks and Building Separation:</p> <ul style="list-style-type: none"> <li>• Front and rear setbacks should be 7m</li> <li>• Reduction of landscaped area along Beecroft – basement should be realigned to provide deep soil to the boundary</li> <li>• Increases in building lengths are not supported</li> <li>• Extension of Building D results in a 65m continuous street wall</li> <li>• Reduction of deep soil within the site which is required for large canopy growth</li> <li>• Balconies of apartments should not extend beyond the existing approved building envelopes</li> <li>• Building A and D should better align as they have ground floor commercial and should have a greater front setback.</li> <li>• Buildings D and B should better align</li> <li>• No extension of Buildings E and C is supported</li> </ul>	<p>Not satisfactorily addressed.</p>
<p>Setback to Devlins Creek</p> <ul style="list-style-type: none"> <li>• Extension of Building E and extension of Building C are not supported as they impact any effort to naturalise Devlins Creek in future.</li> </ul>	<p>Limited evidence has been provided to ensure the naturalisation of Devlin's Creek is possible with the proposed setbacks.</p>

<p>Basement Setbacks and Alignment:</p> <ul style="list-style-type: none"> <li>The basement should be consolidated beneath the building footprints and consistent with all building setbacks to provide opportunities for large trees and deep soil planting.</li> </ul>	<p>Not satisfactorily addressed.</p>
<p>Building Separation</p> <ul style="list-style-type: none"> <li>Non-compliant separation between Buildings A and C</li> <li>Non-compliant separation between Buildings B and D</li> <li>Non-compliant separation between Building A and the southern boundary</li> <li>Use of privacy screening should not mitigate the impact of lack of building separation.</li> </ul>	<p>Not satisfactorily addressed.</p>
<p>Tree Planting:</p> <ul style="list-style-type: none"> <li>Power lines along Beecroft Road should be undergrounded and street trees capable of growing to more than 13m should be proposed</li> <li>Large trees should be planted in the Beecroft Road setback at 8-10m intervals</li> <li>Tree species along Beecroft Road should be <i>Lophostemon confertus</i></li> <li>Tree species along Ray Road should be changed. <i>Waterhousia floribunda</i> are suggested.</li> </ul>	<p>Addressed through recommended conditions of consent.</p>
<p>Site Reconfiguration:</p> <ul style="list-style-type: none"> <li>The percentage of apartments receiving no direct sunlight is 17.6%, exceeding the ADG guidance of 15%.</li> <li>Reduction in separation between building wings results in north facing bedrooms having oblique windows facing west instead of north.</li> </ul>	<p>Partially addressed.</p>



<p>Way finding and building accesses:</p> <ul style="list-style-type: none"><li>• Consolidation of service vehicle and entry to basement parking is supported.</li><li>• Building E fire escape should exit directly to the street instead of the communal open space for safety reasons.</li><li>• Building E would benefit from access to the communal open space having a more direct path from the lobby and lifts.</li><li>• Building C access from the core to the communal open space should be more direct.</li><li>• Building A should have access to communal and open space through Building B and should have access to the rooftop open space above Building A.</li></ul>	<p>Partially addressed.</p>
<p>Building A Entry:</p> <ul style="list-style-type: none"><li>• Reduction in the area and width of the residential lobby to Building A does not promote a sense of address or visual interest and activation.</li><li>• Addition of an apartment at the Ray Road frontage of Building A is not supported.</li></ul>	<p>Partially addressed through recommended conditions of consent.</p>
<p>Solar access to Communal Open Space:</p> <ul style="list-style-type: none"><li>• Communal open space should be reinstated to Buildings C or E as it receives more sunlight.</li></ul>	<p>Not satisfactorily addressed.</p>
<p>Pedestrian Through Site Link:</p> <ul style="list-style-type: none"><li>• Applicant's revisions to the through site link appear much better resolved</li><li>• The link should have a clear visual connection from Beecroft Road. The current alignment of the ramps, stairs and retaining walls obstruct clear sightlines to the link.</li></ul>	<p>Addressed through amended documentation and conditions of consent.</p>



<ul style="list-style-type: none"><li>• The link must be 3m wide.</li><li>• Check that the connected ramps must not have a combined vertical rise of more than 3.6m</li></ul>	
<p>Accessibility and Adaptability:</p> <ul style="list-style-type: none"><li>• Ensure compliance with the Access Report</li><li>• Wayfinding and shoreline identification is provided from the footpaths are the buildings to the building entries.</li><li>• Consider ramped access directly from Beecroft Road footpath to provide a less convoluted path of travel.</li><li>• Adaptable apartments require design amendments to bathrooms, showers, and door widths.</li></ul>	Addressed through amended documentation and conditions of consent.
<p>Affordable Housing:</p> <ul style="list-style-type: none"><li>• No further comments are provided in relation to the delivery of affordable housing.</li></ul>	N/A
<p>Public Domain</p> <ul style="list-style-type: none"><li>• All existing footpaths, kerbs and gutters along both street frontages should be reconstructed.</li><li>• Footpaths should be 1.8m wide and constructed to Council's standards</li><li>• Footpaths should be built at the property boundary enabling as wide a verge as possible</li><li>• Electrical pillars, where required, should be installed neatly with a distance of 100mm from the property boundary</li><li>• Street furniture should be provided as per Parramatta Public Domain Guidelines.</li></ul>	Address through amended documentation and conditions of consent.



<p>Flooding and Stormwater</p> <ul style="list-style-type: none"><li>• Flood study lodged with the Response to Submissions is satisfactory</li><li>• Proposed on site detention tank should be relocated so it is not beneath or adjacent to habitable rooms</li><li>• An additional access grate to the onsite detention tank is required.</li></ul>	<p>Addressed through conditions of consent.</p>
---	---