



11 August 2025

Mr Anthony Witherdin
Director, Key Sites and TOD Assessments
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Via email:
CC:



**State Significant Development (SSD) Applications – Beecroft Road, Epping
Amending Concept SSD (SSD-68939460) & Amending Detailed SSD (SSD-68708456)
Request for Additional Comment on Recommended Condition of Consent and Request for
Information**

Dear Anthony,

I refer to the above SSD applications (**Applications**), currently before the Independent Planning Commission (**Commission**) for determination.

Request for Additional Comment on Recommended Conditions of Consent

Thank you for the Department of Planning, Housing and Infrastructure's comments (**Department's**) comments, received 6 August 2025, on the Commission's proposed amendments to draft conditions of development consent. In consideration of your comments, the Commission is considering further amendments and subsequently, the imposition of the attached conditions of consent for the Application (**Attachment A**) should it determine to approve the Application.

The Commission's proposed amendments primarily relate to consistency between the requirements of recommended conditions of development consent of the Amending Concept SSD (SSD-68939460), and the documentation provided in support of the Amending Detailed SSD (SSD-68708456).

The Commission seeks the Department's advice on the workability, enforceability and any potential unintended consequences of the proposed condition amendments, noting that the Amending Detailed SSD must comply with the Amending Concept SSD conditions of development consent. The Commission will also consider any proposed changes to the conditions the Department sees fit in light of the consistency issue.

Request for Information

Regarding the consistency of Amending Detailed SSD (SSD-68708456) with the proposed recommended conditions of Amending Concept SSD (SSD-68939460):

1. For the Amending Detailed SSD (SSD-68708456) consent, please provide the following:
 - (a) an updated Advisory Notes section including updated references and any relevant notes to the Housing and Productivity Contributions; and
 - (b) an updated Appendix 1 – Written Incident Notification Requirements reflecting the Department's current requirements and process for notification of incidents.



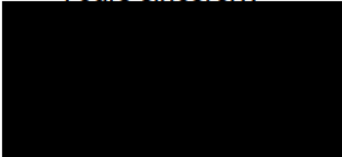
2. The Commission notes the Department's request to reinstate the subdivision plans inadvertently omitted as per the Original Detailed Design development consent, however the Commission notes the following:
- (a) the approved plans under the Original Detailed Design consent include subdivision of the basement levels (including a commercial allotment) and they do not include 'basement 3' or the additional dwellings/apartments proposed as part of the Applications; and
 - (b) the recommended Amending Detailed Design development consent includes Part G with multiple conditions referring to subdivision plans within proposed condition A2 of the development consent, which as recommended to the Commission, does not include any plans of subdivision.

In consideration of the above, can the Department please provide relevant plans of subdivision which align with the Applications, and/or advise on the most appropriate course of action to address the matters raised in items 2(a) and (b)?

Could you please provide the Department's response by **5pm Friday, 20 August 2025**.

Should you require any clarification in relation to the above, or wish to discuss further, please contact Kendall Clydsdale at [REDACTED]

Yours sincerely,



Stephen Barry

Planning Director

242-244 Beecroft Road, Epping – Amending Concept SSD (SSD-68939460)

Changes to Conditions of Consent

Notes:

1. The Table below must be read in conjunction with the Commission's prior correspondence dated 31 July 2025 and the subsequent response from the Department of Planning, Housing and Infrastructure (DPHI), dated 6 August 2025.
2. Not all conditions in the table below are replicated in full, only necessary parts of the conditions to demonstrate changes.
3. As a result of new conditions, re-numbering of conditions will be required/undertaken.
4. Minor grammatical, typographical and condition cross-reference corrections to conditions are not included in the table below.

Condition No.	Commission's Intended Outcome	Revised Condition (Additions in bold and underlined , deletions in strikethrough)	DPHI Comments
SCHEDULE 2			
B6 DESIGN INTEGRITY	<p>Question for the Department:</p> <p>The Commission notes the Department considers the Architectural Report forming part of the Amended Detailed SSD to satisfy this condition.</p> <p>The Commission seeks confirmation of the following matters being addressed within the Architectural Report, as required by this condition:</p> <ul style="list-style-type: none"> a. the design objectives of the Concept development application; b. consistency with the approved Design Guidelines; c. the advice of the State Design Review Panel; d. the conditions of the Concept Approval; e. responses by the Applicant to the SDRP advice; and f. details of how the process will be implemented through to completion of the approved development. <p>If the Department finds the above to not be relevant to the Applications, please provide justification as to why and a suitable recommended condition amendment.</p>		
B9 TRAVEL DEMAND MANAGEMENT	<p>The Commission notes the Department considers the Preliminary Green Travel Plan included as part 3.12 of the Traffic Impact Assessment forming part of the Amended Detailed SSD to satisfy this condition.</p> <p>The Commission notes that part 3.13 of the TIA states "This report includes a preliminary Green Travel Plan (GTP) identifying some key items that could be included in a more detailed plan to be completed prior to the initial opening of the development."</p> <p>The Commission does not consider the general information included in part 3.13 (provided as items that could be included in a future completed GTP) to form a GTP for the purposes of satisfying this condition, and does not include consideration of Section 6.1.2 of the Parramatta DCP.</p> <p>The Commission is of the view that a Green Travel Plan is appropriate to be prepared prior to the issue of any Occupation Certificate in accordance with recommended condition E30 of the Amending Detailed Design consent.</p> <p>Question for the Department:</p> <p>Can the Department comment if it considers this change suitable and appropriate in the context of the proposed development?</p>	<p>Future development applications shall be accompanied by a Green Travel Plan consistent with the framework and initiatives in Section 3.13 of the Transport Impact Assessment dated 2 July 2024 prepared by SCT Consulting. The Green Travel Plan must also consider the requirements of Section 6.1.2 of the Parramatta Development Control Plan 2023.</p> <p><u>The Green Travel Plan may be prepared for implementation under the conditions of any consent for future development applications.</u></p>	

Condition No.	Commission's Intended Outcome	Revised Condition (Additions in bold and underlined , deletions in strikethrough)	DPHI Comments
B11 TRAFFIC, ACCESS AND PARKING ASSESSMENT	<p>The Commission notes the Department consider the Preliminary CPTMP included within the Traffic Impact Assessment (TIA) to satisfy this condition.</p> <p>However, the Commission notes the following regarding the Preliminary CPTMP:</p> <ul style="list-style-type: none"> - it has not been prepared in consultation with TfNSW and/or Council; - has not been prepared to the satisfaction of the relevant road authorities; - does not include a construction car parking strategy; - provides estimated construction vehicle volumes to be confirmed at a later stage; - does not include a detailed travel management strategy; - does not include consideration of maintaining property access other than access to the Site itself; - does not consider bus operations; - does not include an independent road safety audit on construction related traffic measures; and - does not consider measures to account for any cumulative activities/work zones operating simultaneously. <p>The Commission therefore does not consider the Preliminary CPTMP included within the TIA to satisfy this condition.</p> <p>The Commission is of the view that a CPTMP is appropriate to be prepared prior to the commencement of any earthworks or construction in accordance with recommended condition C22 of the Amending Detailed Design consent.</p> <p>Question for the Department:</p> <p>Can the Department comment if it considers this change suitable and appropriate in the context of the proposed development?</p>	<p>Future development applications shall include a Construction Traffic and Pedestrian Management Plan (CTPMP) prepared in consultation with Transport for NSW (TfNSW) and Council, and to the satisfaction of the relevant road authorities. The CTMP shall include, but not be limited to:</p> <ul style="list-style-type: none"> (a) construction car parking strategy; (b) haulage movement numbers / routes including contingency routes; (c) detailed travel management strategy for construction vehicles including staff movements; (d) maintaining property accesses; (e) maintaining bus operations including routes and bus stops; (f) maintaining pedestrian and cyclist links / routes; (g) independent road safety audits on construction related traffic measures; and (h) measures to account for any cumulative activities / work zones operating simultaneously. <p><u>The CTPMP above may be prepared as part of a Construction Environmental Management Plan prepared for implementation under the conditions of any consent for future development applications.</u></p>	
B12 TRAFFIC, ACCESS AND PARKING ASSESSMENT	<p>The Commission notes that the Department is satisfied that the TIA includes road safety considerations and that detailed independent road safety audits will be undertaken during design development as part of the CC process.</p> <p>The Commission considers that deferring road safety audits to be completed at CC stage does not satisfy this condition as currently proposed.</p> <p>Question for the Department:</p> <p>The Commission seeks clarification of the Project's consistency with this condition, including if the Department are of the view this condition should be amended to move this requirement to a post-determination matter, including justification as to why.</p>		
B16 WIND IMPACT ASSESSMENT	<p>Question for the Department:</p> <p>The Commission notes the Department considers the Pedestrian Wind Statement to satisfy this condition. However, the Commission notes that the condition as worded requires a Wind Impact Assessment (not specifying pedestrian wind).</p> <p>The Commission requires clarification from the Department on if it is the intent of this condition to only address pedestrian wind impacts and the structural integrity of the development, or only pedestrian wind impacts (and why).</p>	<p>Future development applications shall be accompanied by a Wind Impact Assessment including computer modelling within a wind tunnel study of detailed building form. Wind criteria for the use of different spaces around the development are to be adopted. Recommendations of the Wind Impact Assessment must be incorporated in the architectural drawings supporting future development applications.</p>	

Condition No.	Commission's Intended Outcome	Revised Condition (Additions in bold and underlined , deletions in striethrough)	DPHI Comments
	<p>Question for the Department:</p> <p>The Commission also notes the Departments advice that the computer modelling required not being provided is acceptable as expert analysis of wind conditions has been carried out and recommendations made accordingly.</p> <p>Can the Department comment if it is appropriate for condition B16 to be amended to delete the requirement of the computer modelling, including justification if it is found to be appropriate?</p> <p>Please note that as the Commission has already proposed this condition be updated in schedule 3, any subsequent changes would also carry through to schedule 3.</p>		
B20 SECURITY AND CRIME ASSESSMENT	<p>The Commission considers the confirmation of consultation with NSW Police and preparation in regard to the National Security Authority publication is necessary to comply with this condition as currently worded.</p> <p>The Commission understands the Department's advice is that consultation with NSW Police and regard to the publication are not required. Therefore, the Commission proposes to remove these requirements to ensure consistency with this condition.</p> <p>Question for the Department:</p> <p>Can the Department comment if it considers this change suitable and appropriate in the context of the proposed development?</p> <p>Please note that as the Commission has already proposed this condition be updated in schedule 3, any subsequent changes would also carry through to schedule 3.</p>	<p>Future development applications shall be accompanied by a Security and Crime Risk Assessment Crime Prevention Through Environmental Design (CPTED) Assessment, prepared in consultation with NSW Police having regard to Crime Prevention Through Environmental Design (CPTED) Principles and National Security Authority publication "Hostile Vehicle Guidelines for Crowded Places: A guide for owners, operators and designers".</p>	
B21 CONSTRUCTION IMPACT ASSESSMENT	<p>The Commission understands the listed sub-plans have been required as conditions of consent as allowed by condition B22.</p> <p>Question for the Department:</p> <p>The Commission requests clarification of where in the condition requiring a CEMP the requirement for community consultation and engagement plan(s) has been satisfied.</p> <p>Question for the Department:</p> <p>The Commission is also of the understanding the requirement for a Noise and Vibration Impact <i>Assessment</i> is an error and should be amended to require a Noise and Vibration Management Plan. Can the Department comment if it considers this change suitable and appropriate in the context of the proposed development?</p>	<p>Future development applications shall provide analysis and assessment of the impacts of construction works and include:</p> <ul style="list-style-type: none"> (a) Construction Traffic and Pedestrian Management Plan (b) Community Consultation and Engagement Plan(s) (c) Noise and Vibration Impact Assessment Noise and Vibration Management Plan (d) Construction Waste Management Plan (e) Air Quality Management Plan. 	
B25 FLOODING AND STORMWATER ASSESSMENT	<p>Question for the Department:</p> <p>The Commission notes that the Department considers the Flood Risk and Impact Assessment to satisfy this condition.</p> <p>The Commission notes this condition requires a Flood <i>and Stormwater</i> Impact Assessment.</p> <p>Can the Department confirm if the stormwater component of this condition has been satisfied by the Amending Detailed Design SSD and if any further amendments to this condition are required to ensure the Amending Detailed SSD demonstrates compliance?</p>		

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B26 REFLECTIVITY ASSESSMENT	Question for the Department: The Commission does not consider the Architectural Report containing analysis of the façade composition and the proposal's glazing-to-solid ratio being low to satisfy the requirement of a Reflectivity Assessment. If the Department are of the view that a specific Reflectivity Assessment is not required, please provide justification as to why and a suitable recommended condition amendment.		

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SCHEDULE 3 – MODIFICATIONS TO SSD-8784			
C9	Consistent with amendments to condition B9 of Schedule 2 above.	Future development applications shall be accompanied by a Green Travel Plan consistent with the framework and initiatives in Section 3.13 Section 3.3 of the Transport Impact Assessment dated 2 July 2024 8 June 2010 prepared by SCT Consulting. The Green Travel Plan must also consider the requirements of Section 6.1.2 of the Parramatta Development Control Plan 2023 Section 1C.2.1(a) of the Hornsby DCP 2013 . <u>The Green Travel Plan may be prepared for implementation under the conditions of any consent for future development applications.</u>	

242-244 Beecroft Road, Epping – Amending Detailed SSD (SSD-68708456)

Changes to Conditions of Consent

Notes:

1. Not all conditions in the table below are replicated in full, only necessary parts of the conditions to demonstrate changes.
2. As a result of new conditions, re-numbering of conditions will be required/undertaken.
3. Minor grammatical, typographical and condition cross-reference corrections to conditions are not included in the table below.

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SCHEDULE 2			
C21 CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN	To ensure all social impact management measures are captured in the Construction Environmental Management Plan	(x) compliance with the social impact management measures as detailed within the Social Impact Assessment prepared by Hill PDA Consulting, dated, 28 June 2024;	
E29 GREEN TRAVEL PLAN	The Commission has proposed above a change to the Amending Concept conditions that allows for the Green Travel Plan that was required to be submitted with the Amending Detailed Design application to be prepared as part of a condition of consent of the Amending Detailed Design consent. This change requires any GTP prepared under a condition of consent of the Amending Detailed Design consent to be prepared consistent with the requirements of the Amending Concept Plan, being: - consistent with the framework and initiatives in Section 3.13 of the Transport Impact Assessment dated 2 July 2024 prepared by SCT Consulting; and	Prior to the issue of any Occupation Certificate, the Applicant must prepare a Green Travel Plan (GTP) in consultation with TfNSW and submit it to development.sco@transport.nsw.gov.au for their endorsement. The GTP must be consistent with the framework and initiatives in Section 3.13 of the Transport Impact Assessment dated 2 July 2024 prepared by SCT Consulting. The GTP must consider, but not be limited to, the following matters: (a) the requirements of Section 6.1.2 of the Parramatta Development Control Plan 2023;	

Condition No.	Commission's Intended Outcome	Revised Condition (Additions in <u>bold and underlined</u> , deletions in strikethrough)	DPHI Comments
	<ul style="list-style-type: none">- consideration of the requirements of Section 6.1.2 of the Parramatta Development Control Plan 2023. <p>To ensure this consistency, the Commission has proposed these requirements be included in condition E29 of the Amending Detailed Design consent.</p>		