

# Epping Civic Trust Submission

## Epping Town Centre Urban Activation Precinct

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## Quality Assurance

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## 1. Executive Summary

Think Planners Pty Ltd have been engaged by the Epping Civic Trust to review the exhibited material for the Epping Urban Activation Precinct; provide a critical analysis of the material; and make a submission to NSW Planning on behalf of the Epping Civic Trust and its members.

In summary this submission advocates for –

- No change of land use controls to be undertaken ahead of necessary studies and the completion of infrastructure works required to support the UAP.
- Amendments to the spread of density and heights across the town centre, including clear controls on number of storeys permitted.
- Improved analysis of social and human infrastructure requirements needed to support the new population and provided for in the planning controls.
- Better articulated planning controls that ensure that the targeted dwelling yields will not be exceeded.
- The incorporation of planning controls that guide appropriate built form outcomes into the Local Environmental Plan.
- A thorough review, including public consultation, of the way in which building height and locations will not cause unacceptable shadow impacts on key public places and spaces.
- Full community engagement in the preparation of land use controls for the Precinct, consistent with the principles espoused in the White Paper – “A New Planning System for NSW”.

The Epping Civic Trust accepts that greater urban densities around transport nodes is an appropriate planning outcome and that such has been proposed for the Epping Town Centre in its identification as an Urban Activation Precinct. While increased housing densities and changes to planning controls are to be anticipated, concern is expressed in relation to the timing of rezonings; details of the proposal; and the manner in which the proposal has been thrust upon the community.

Notably, this paper calls for the State Government to act faithfully to the principles espoused in its current overhaul of the planning system as espoused in the Green and White Papers “A New Planning System for NSW”. The Government has promised that the planning system is to include true community participation at the start of the process, to ensure that the



community plays an integral part in setting the vision and ground rules for local areas. It is time that NSW Planning acts to engage a representative and sizable proportion of that community in the planning process for Epping Town Centre, rather than ask them to comment on planning controls that appear to be “fait accompli”.

Epping Civic Trust looks forward to working collaboratively with the Government in fine tuning the current draft planning controls; and then seeing the implementation of planning controls only when proper and thorough studies and works are completed. A collaborative and thoroughly informed planning process will ensure that the transition of Epping from a moderate metropolitan node to an Urban Activation Precinct is well considered and appropriately managed. Importantly it will have the general support and endorsement of those that are affected the most – those who live in, work in and are part of the human fabric that makes up the Epping Town Centre.



## 2. Introduction

### The Tenor of this Submission

The Epping Civic Trust has been a voice for the community of Epping and surrounds for over 40 years and has always played a positive and active part in the planning decisions for the area. The Trust has sought to embrace positive change over the years, at times educating its own members as to the need for change and the importance of eschewing any inward looking attitude as so often is reflected in local community groups. In this regard the Epping Civic Trust has been an active supporter and contributor to outcomes for a number of significant urban changes in the Epping area, including the M2 motorway and the Chatswood to Epping rail link.

Accordingly, this submission is made in a positive manner, with the express intent of being helpful in improving the way in which the Epping Urban Activation Precinct planning controls are prepared and delivered. It is noted that there is no in principle objection to the identification of Epping town centre as an Urban Activation Precinct. However, concern is expressed in relation to the timing of any rezoning; details of the proposal; and the manner in which the proposal has been thrust upon the community.

### Community Representation and Meeting

On 18 April 2013 the Epping Civic Trust held a Public Meeting at the Church of Christ Hall in Epping. The local member Greg Smith attended the meeting, along with representatives of the NSW Planning and Think Planners Pty Ltd, who all presented to the public.

Notably, five hundred and eighteen (518) people from the community attended the Epping Civic Trust Public Meeting. It is apparent that not only is there significant community interest in Epping Town Centre UAP, but that the Epping Civic Trust represents a significant proportion of the local community.

At the Public Meeting a broad range of questions and issues were discussed, and this submission also covers these matters on behalf of the Epping community.

### Submission Content

This submission provides a commentary on a broad range of issues, which are addressed in turn below. The submission seeks to start with those broader “big picture” strategic planning matters and then progressively focuses in scope to more detailed components of the proposed controls.

### 3. Community Participation

Public information that advocates and describes the State Government's "A New Planning System for NSW" states as follow -

*Community participation in the preparation of plans and a vision for their local areas represents a key change in the new planning system. This means that the opportunity for the community to participate at the start of the planning process and on an ongoing basis will be prioritised and integral to setting the vision and ground rules for local areas. It also means there will be a wider range of tools and techniques to interest and engage a representative and sizable proportion of the community in the planning process, while ePlanning will transform paper based consultation methods, planning requirements and development assessment processes.*

Epping Civic Trust is disappointed that the express aims of the new planning system in relation to the way in which the community is to participate at the start of the planning process and is to be integral to the setting of the vision and ground rules for local areas have not been incorporated into the planning process for the Epping Town Centre UAP. Rather, the nomination of the UAP and the controls developed have not been undertaken consistent with the rhetoric espoused by the State Government and NSW Planning in relation to the new planning system. It is not too late to start this process now.

As an example, the Epping Civic Trust has a policy for the Epping town centre that it be developed in consultation with the community "That there be no re-zoning of the areas that are single residences to multi- unit housing and residential flats". This policy is in direct conflict with the proposals in the exhibited material for the Residential Intensification Areas. Until the Trust and local residents are given the opportunity to meaningfully contribute in the preparation of planning controls for these areas there is an impasse. The process adopted by NSW Planning for the UAP stands in stark contrast to the community participation model advocated by the State Government and is therefore paradoxically an example of the very method of community participation that the Government has dismissed and has set about to replace.

This paper calls for the State Government to act faithfully to the principles espoused in its current overhaul of the planning system. Accordingly it is requested that NSW Planning include true community participation at the start of the process, to ensure that the community plays an integral part in setting the vision and ground rules for local areas. It is requested that NSW Planning act to engage a representative and sizable proportion of the community in the planning process for Epping Town Centre, rather than ask them to comment on planning controls that appears to be "fait accompli". It is not too late for the finalisation of the Epping Town Centre UAP planning controls only be completed once the community has been given opportunity to participate in their preparation and finalisation. Having regard to other requests in this submission for minor road works to proceed ahead of any rezoning, it is submitted that there is adequate time to include proper community participation now.

## 4. Road Network and Traffic Improvements

The Planning Report placed on public exhibition appropriately identifies that there are substantial delays and congestion in the existing road network in and around the Epping Town Centre. The exhibited material suggests that there will in turn be an increase in traffic generation from the UAP proposal, but suggests that the increase is only 5% on top of existing. Implicit in this analysis is an acceptance by the State Government and NSW Planning is that the traffic congestion in Epping, as a result of the UAP, will go from “bad to worse”.

The reports also place great reliance upon the need for a modal shift from cars to public transport by a great proportion of people who reside in the Epping Town Centre to ensure that the traffic congestion will not be even worse again. It is acknowledged within the exhibited material that the most critical way to address the traffic issues are strategies that reduce car usage.

It is untenable that any planning study could advocate for a change from “bad to worse”, without first seeking to address the existing traffic problems, or at the very least, take steps to make matters no worse than existing. It is equally alarming that a decision of such magnitude for the Epping town centre be made on the back of a vacuous ideal that we solve traffic congestion by simply getting people on trains. There is no data around the numbers of people who will be required to change their transport activities, nor any strategy presented as to how this can occur, nor any discussion on whether the transport links to and from Epping are adequate to enable this outcome.

### Macro Road Network Impacts

The planning reports placed on public exhibition state that a broader strategic review of the traffic and transports issues for the entire Macquarie Park Corridor is to be undertaken some time in the future. It is noted that 3 of the Urban Activation Precincts are located in overall close proximity to each other, being North Ryde, Epping and Macquarie Park. It is apparent that it is the intention of NSW Planning to introduce the new planning controls for the Epping Town Centre ahead of the broader strategic review of traffic and transport issues for the Macquarie Park Corridor. That process is placing the “cart before the horse”. Undertaking no cumulative impact assessment upon the road network of three Urban Activation Precincts that are in such close proximity prior to the rezoning of such lands is irresponsible and flawed planning practice. Such a study can be readily undertaken in a short period of time and should precede the rezoning of the precinct. It is requested that the Macquarie Park Corridor Road Network study, that examines the cumulative impact upon the road network of the three Urban Activation Precincts precede the rezoning of the Epping Town Centre.

### Micro Road Network Improvements

The exhibited material identifies that the Epping Town Centre should benefit from a number of minor localised road improvements such as intersection upgrades, carriage widening, prohibition of certain traffic movements and introduction of a pedestrian and cycle footbridge). Epping Civic Trust welcomes the identification of these works and the expressed

intention to complete the works. Concern is expressed however in relation the allocation of funding, estimated timing for CC drawings and promised delivery dates for the works.

Further we are concerned that the identified road works are not identified in any infrastructure plan; nor is the responsible authority for the works identified; the level of community consultation that will occur; funding allocation or timeframes.

The traffic improvements have been costed in the Halcrow report at \$16.1 million. It is stated that the funding has been allocated for the local road improvements. The representatives of NSW Planning confirmed to the public meeting in April 2013 that such funding has been allocated and that the traffic improvements are to commence in the coming 2-3 years. However, there is no information in the UAP exhibition material confirming the timing of the works or their staging over a number of years.

The Epping Civic Trust calls upon the State Government to immediately commence the local road network traffic works. The works are recorded all parties agree their need; and the budget is in place. The design of these works can occur over a short period of time and their implementation commence shortly thereafter. There is no apparent reason for a delay of 2-3 years for the works to commence. Why does the community need to wait for as long as 2-3 years?

#### Commuter Parking and Buses

Of concern also to the Epping Civic Trust is the way in which commuter parking demand is managed out of the Epping Town Centre in the future. Any reliance and reinforcement of use of the railway infrastructure will result in an increase in commuters who do not live within walking distance of the railway station, yet who will prefer to use public transport. No strategy is identified in the exhibited material for dealing with the demands of commuter parking. NSW Planning have previously concurred with the views of Hornsby Council and Epping Civic Trust that there is to be no commuter parking provision within the Epping Town Centre. Accordingly it is necessary that a strategy for commuter parking be articulated as part of the UAP process. Such commuter parking would be best provided at Carlingford, consistent with findings in the Epping to Parramatta Rail plan. Congestion in the Epping Town Centre will dramatically worsen if NSW Planning provides no meaningful or actual strategy to reduce commuter parking in the town centre. This matter simply should not be ignored.

Related to the need to provide commuter parking outside of the Epping Town Centre is the need to improve bus public transport connections to the town centre from both future parking points and from the surrounding suburbs. Of particular concern is the inadequate bus connections between Carlingford and Epping. There is no service along Carlingford Road that encourages the local population to take advantage of the rail infrastructure at Epping. The introduction of a new bus route (M54) was greeted by the Trust as a positive initiative of the government. However, the operation of this service has confirmed that the traffic congestion during peak times is poor and causes significant delays, severely compromising the service. It is clear that a regular prioritised (transit lane / bus lane) service along Carlingford Road linking the centres of Carlingford and Epping, and providing set down and pick up opportunities for



residents between, is of fundamental importance and relevance in implementing the intention of government for greater public transport use at Epping.

### Infrastructure Strategy

The Epping Town Centre Urban Activation Precinct exhibited material lists “Project Objectives”, which include improving pedestrian and cycle connections within and throughout the precinct. It is notable that there is no “project objective” for improving traffic connections and movements throughout the precinct. It is hoped that this omission is unintended, rather than conveniently unsaid. We note that the Government’s White Paper for improving the NSW Planning system commits to the provision of Infrastructure Plans with any Local Plans. The White States –

*In the past, infrastructure planning and delivery has failed to adequately support growth. A lack of coordination between government agencies and a lack of alignment with land use planning and government budget processes has contributed to fragmented, inefficient, and delayed infrastructure delivery.*

The absence of any infrastructure strategy and plan, along with relevant background studies, will ensure that the mistakes of the past, as articulated in the quote above, will be repeated.

The Epping Civic Trust objects to the implementation of land use changes ahead of the infrastructure required to support it.

### **Road and Traffic Summary**

It is clear that the most discussed and contentious issue for the Epping Civic Trust members and the local community is that of traffic congestion in and around the Epping Town Centre.

The exhibition material acknowledges that the UAP proposal will result in bad traffic congestion becoming worse. It also acknowledges that there is a need for more people to shift from car usage to public transport, but is silent on how this can be encouraged or achieved. Further, there is an intention to undertake a study on cumulative impacts of 3 UAP’s in close proximity only after they are implemented. Finally, the identified minor “tweaks” to the local road network, though identified and funded, are inexplicably not to be delivered for a number years. There is no works program advertised, identifying responsible authorities, budgets or timing. There is no indication of consultation between the differing road authorities.

The Epping Civic Trust believes that the analysis and actions proposed in relation to the road network and traffic congestion to be appallingly conceived and represent inexcusable planning.

We seek that prior to the implementation of any rezoning of the Epping Town Centre that NSW Planning –

- Complete the Macquarie Park Corridor road network and traffic congestion study;



- Clearly detail the agreed local road works; clarify how they are to be funded; and ensure they are fully constructed and operational;
- Articulate and implement a strategy for shifting people from car usage to public transport usage; and
- Identify how commuter car parking is to be managed outside of the town centre at places such as Carlingford.

## 5. Hierarchy of Heights and Urban Design Massing

The UAP proposal is for 3650 new dwellings in the Epping Town Centre, with a range of heights and floor space ratios. The Epping Civic Trust supports the concentrated strategy of placing housing density within the city centre core. Such support is based upon the protection of amenity of public spaces and places in the town centre from impacts such as overshadowing and wind tunnelling.

Concern is however expressed in relation to how the exhibited material manages housing density at the fringes. The Epping Civic Trust calls for greater community participation in identifying where the edges of the town centre are, and the way in which housing density and urban form (particularly height) is managed at the fringes. The rationale for the proposed height regime for housing on the fringes of the Epping Town Centre is not clearly articulated or understood.

### Clearer Planning Controls

The Structure Plan identifies proposed building heights in both number of storeys and height. Epping Civic Trust expresses significant concern that the controls are not clearly expressed and therefore could be abused by future developers. For example, in the Hornsby local government area an 8 storey building would be attributed a 26.5m height control, whereas the UAP proposal provides a 28m height control for an 8 storey building. A 28m height control would theoretically allow for the development of up to 9 storeys through a well designed and constructed proposal. Similarly the UAP proposal for 18m and 5 storeys is more generous than the Hornsby Council control of 17.5m and 5 storeys. A 6 storey building can fall within 18m. The detail of the planning controls requires far more rigorous analysis to ensure that the controls are not capable of manipulation and the intended 3650 dwelling yield not be progressively inflated through the development approval process, leading to unplanned for and unintended consequences. Though the Standard Instrument template tends to exclude a “number of storeys” map, it is requested that in the absence of a clear development standard of number of storeys, that the planning controls provide heights consistent with that identified by Hornsby Council and are not so generous to permit future applicants opportunity to leverage additional storeys in a design than what was originally intended.

### Heights on the Fringe

The UAP proposal for a compact and high density core is intended to deliver an appropriate transition in built form height at the edges where the town centre abuts low density housing. From a peak of 72m and 22 storeys at the core, the hierarchy of heights steps down to include 3 – 8 storey high density, 3 – 5 storey medium density and 2 storey low density.

Of particular concern to the Epping Civic Trust is the poor transitioning expressed in the plan between the medium and low density areas. It is the Trusts express view that no low density housing precinct should be adjoined across a boundary by a 5 storey built form. Low density housing should be fringed by no greater than 3 storey medium density housing, that then transitions to 5 storeys towards the core.



There are a number of places in the draft Structure Plan where an 18m and 5 storey site immediately adjoins a 9m and 2 storey site. While there is good reason to allow such a transition where there is an appropriate break in the urban form, such as a dissecting road, it is entirely inappropriate to permit such blunt urban transitions in the context of the Epping Town Centre fringe. The impacts of a 5 storey residential flat building abutting a 2 storey dwelling in both urban form and amenity are obvious and any such scenario is not consistent with the transitional principle espoused in the plan and should be removed entirely from the proposal.

## 6. Heritage

The Epping Civic Trust has long supported the protection of natural and built items of heritage. The Epping Town Centre UAP correctly identifies key heritage items and it is acknowledged that heritage matters have been generally well articulated in the UAP exhibition material. It is acknowledged that the objective of protecting heritage items is best served by increasing densities at the core that allows for protection of heritage items that tend to be predominantly located toward the edges of the precinct.

However, it is noted that a number of heritage items in the city core area are missing from the exhibited plans and we request that this oversight be corrected.

The Epping Civic Trust seeks clarification and confirmation that the items of heritage identified in the draft LEP plans include all those items identified in the Tropman and Tropman heritage investigations of 2001. It is difficult to determine in the exhibited material on what basis the items of heritage have been identified and proper referencing to the 2001 study is considered relevant. The Perumal Murphy Alessi study commissioned by the Department and provided in the exhibition material is limited to a review of an expansion of the heritage conservation area and review of recently nominated heritage items. There is an information gap in relation to the recognition of other items of heritage. We believe that appropriate referencing is important to demonstrate in any future challenge to the heritage status of these properties that their nomination was well founded.

Finally, it is noted that the Trust fully supports the well researched heritage initiatives undertaken by Parramatta Council in seeking to expand the heritage conservation zones of Epping, as is included in the UAP exhibition material.

## 7. Infrastructure

### Infrastructure Servicing Development

A New Planning System for NSW – White Paper:

*In the past, infrastructure planning and delivery has failed to adequately support growth. A lack of coordination between government agencies and a lack of alignment with land use planning and government budget processes has contributed to fragmented, inefficient, and delayed infrastructure delivery.*

*Infrastructure delivery in NSW has traditionally been planned and delivered by individual government agencies, on an agency network basis, which means that they have delivered infrastructure on the basis of their own priorities, often in isolation of the activities of other infrastructure providers. This has led to uncoordinated infrastructure delivery for greenfield and infill areas and a lack of coordination in the budget process to ensure that funding for infrastructure for an area is available when it is needed. This has contributed to a lack of investment confidence from the private sector that government can be relied on to meet its infrastructure commitments.*

The Epping Town Centre UAP fails to act in accordance with the intentions of the State Government as espoused above. On the contrary the localised infrastructure is given glib consideration in the Planning Report, best summarised as follows –

- Trunk Drainage – stormwater runoff to be considered at development application stage;
- Electricity – provision is nearing capacity and service will be addressed at development application stage;
- Water – Water supply and waste water infrastructure may need amplification and will be determined as the detailed development stage; and
- Communication – no consultation has been undertaken with communication authorities and services and will be left to the developer at the development application stage to resolve.

While a number of these infrastructure requirements are to be implemented by local government, it is noted that others are not and that investigations into all should be undertaken irrespective of who is the responsible authority.

The identification of Epping Town Centre as an UAP comes without any consideration as to how or whether some 3650 dwellings and consequential thousands of residents will be serviced by sewer, potable water, electricity or communication services. Nor has there been catchment studies completed that confirm that trunk drainage infrastructure can be workably provided in the areas proposed to be upzoned. The Epping Civic Trust implores NSW Planning to pause and undertake relevant infrastructure studies and investigations first, noting that the area the subject of the UAP is not extensive and that such studies are not of such complexity or size or cost that would prohibit their completion now.



### Social and Human Infrastructure

The Epping Civic Trust raises concern that no adequate consideration has been given to the social and human infrastructure that makes up and services a town centre. Much ado has been made of the transport infrastructure providing the opportunity to increase housing density. However, transport infrastructure represents only 1 part of the fabric of infrastructure required for a healthy, functioning and safe town centre.

Accordingly, further analysis is required to confirm whether there are adequate services in relation to schools, health facilities, policing and other emergency services, recreational facilities and open space.

## 8. Urban Amenity

### Shadowing

Our review of the shadow analysis confirms that the controls proposed for the town centre do not adequately protect key public places or important public spaces in the town centre. To the contrary, it is apparent from a review of the shadow analysis that the proposed built form will result in substantial shadow impacts to likely public recreational spaces and also to the footpaths that are intended to be activated through a thriving retail, restaurant and café environment.

It is noted that the shadow analysis provided to the Trust is not a genuine attempt to illustrate differences in shadows between various height controls as the shadows projected for 3 storey and 10 storey built form predict a built form that is not realistic (being a complete block of 3 and 10 storeys respectively), while the shadows projected for the UAP proposal are broken up in a more realistic representation of future built form. This is a misleading analysis and it is disappointing that this would be provided to the public in such a form.

Of greater concern and relevance is that the shadow analysis confirms that the introduction of a series of towers, of up to 72m in height will result in significant shadows to public places and spaces, contrary to the expectation that recessed slimline towers would allow for refined shadows and significant sunlight to pass between. The protection of the amenity of public spaces such as parks, squares, footpath dining spaces and pedestrian pathways is of critical importance and concern to the Trust.

Having reviewed the shadow analysis the Epping Civic Trust has no confidence that proper consideration has been given to the relationship between increased height and densities with the protection of the amenity of public spaces throughout the town centre.

### Urban Form

It is noted that the Planning Report and Controls embrace the commonly accepted form of street edge podiums for 3 storeys, with recessed slender towers. The intent is to provide a character at the street level that is conventional and oft referred to being of a “human scale”.

The Epping Civic Trust objects to the mismatch between the controls identified for the two principle mainstreets on each side of the town centre – Oxford St and Rawson St. Oxford St is benefited by a 12m setback of the towers above the podium in order to “maintain the existing streetscape character”. Rawson St is given a different set of controls – a 6m setback of the towers above the podium.

As there are essentially two main streets in Epping Town Centre, due to the town centre being split by the railway line and a traffic congested through road, there appears to be an acceptance in the planning controls that the urban form and character of Rawson Street be far

more intensive and not benefit from the same streetscape character that is intended for Oxford Street. This is ill conceived and objected to.

The Rawson Street urban environment should benefit also from appropriate setbacks of towers above the podium of 12 metres. Otherwise the Rawson Street environment will not result in the intended “recessed slim tower” urban design outcome proffered in the NSW Planning documents. The exhibited documents does not provide any rationale for such intensity of urban form along Rawson St and there appears to be no purpose or positive planning outcome in creating two different characters for the two main streets of the Epping Town Centre.

#### Proper Statutory Recognition of Key Controls

Concern is expressed that the planning controls for podium development and recessed towers has no statutory weight. We have no confidence that the intended urban form will be achieved if its implementation is dependent upon the willingness of developers and the consistency of local government decisions. At the very least the planning controls that protect the character of streets through limiting podium heights, requiring recessed slim towers and setting minimum widths of sites must be included within the relevant Local Environmental Plan written instruments and mapping. Anything less will deliver to the development industry a set of guidelines contained within a DCP.

As NSW Planning is well aware, planning controls contained in any DCP have been statutorily determined to be of significantly reduced status and enforceability than that of a LEP. Any serious attempts to provide a set of planning controls that will deliver a positive urban form must result in the key controls being incorporated into the statutory Local Environmental Plan. It would be entirely inappropriate for the statutory LEP controls to be limited to permitting development of up to 72m in height and 6:1 FSR without including in the same instrument the controls that ensure the buildings are “recessed slim towers”. Further, the justification for towers of 72m is dependent upon the amalgamation of sites of no less than 40m in width. Without any statutory reinforcement, the opportunity exists for developers to argue for sites of lesser width, thereby giving rise to the very real possibility of more towers than was ever envisaged. Anything less than proper statutory recognition of key urban form planning controls leaves the planning controls entirely open to abuse and provides the community with no confidence that the intended outcomes will ever be achieved. It is noted that a number of recently gazetted Standard Template LEP’s have included on Part 6 – Additional Local Provisions, site specific controls or key sites maps for sites, roads or land. The Standard Instrument template, along with a number of precedent LEP’s, appropriately allows for the elevation of important planning controls out of DCP’s and into LEP’s. It is our emphatic request and ardent suggestion that planning controls intended to protect and deliver a desired and expressed urban form be placed in the LEP that enjoys statutory recognition and has greater weight than that of the DCP.



### Recreation Space

The provision of recreation and open space in the Urban Activation Precinct is critically limited. The proposal to introduce thousands of new people to the town centre and not identify new active and passive recreational spaces within the centre is a gross oversight.

It is acknowledged that there is a recently acquired recreational area in West Epping, however this is significantly removed from the precinct and does not represent a viable and local option for the thousands of people who are to inhabit the precinct.

Opportunity exists now, at the rezoning stage, to properly identify and locate open space that will benefit residents and visitors to the Urban Activation Precinct. This matter requires further analysis and community engagement prior to the implementation of the planning controls for the precinct.



## 9. Conclusion

Epping Civic Trust is strident in its view that more needs to be done before the Government initiates the proposed sweeping planning changes to the Epping Town Centre. There are studies to be completed. There are infrastructure investigations and works to deliver. There are improvements and fine tuning to the proposed planning controls to be undertaken. There is proper consultation with the community to be finalised.

Epping Civic Trust looks forward to working collaboratively with the Government in fine tuning the current draft planning controls; and then seeing the implementation of planning controls only when proper and thorough studies and works are completed. A collaborative and thoroughly informed planning process will ensure that the transition of Epping from a moderate metropolitan node to an Urban Activation Precinct is well considered and appropriately managed. Importantly it will have the general support and endorsement of those that are affected the most – those who live in, work in and are part of the human fabric that makes up the Epping Town Centre.