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Mr Jason Jondreau
Toga Development & Construction
Toga Group of Companies
Level 5, 45 Jones Street
ULTIMO NSW 2007

3 December 2010

Dear Jason,

Re: 61 Hall Street, Bondi

We refer to the proposal to increase the number of residential parking spaces for this project from the approved number of 39 spaces to 57 spaces.

We outline below reasons why we believe that the provision is justified and appropriate. In doing so we take into account a slight change to the unit mix that has evolved through development of the design.

A total of 44 apartments have been approved. RTA Guidelines suggest that in smaller apartment developments the following provision would normally be required for the approved mix.

14 x 1 bedroom apartments at 1 space/unit	= 14
20 x 2 bedroom apartments at 1.2 spaces/unit	= 24
10 x 3 bedroom apartments at 1.5 spaces/unit	= <u>15</u>
Total	= 53 spaces

Expert real estate advice has indicated that a minimum requirement for the approved mix would be for 54 spaces with the allocation as follows:

14 x 1 bedroom apartments at 1 space/unit	= 14
20 x 2 bedroom apartments at 1 spaces/unit	= 20
10 x 3 bedroom apartments at 2 spaces/unit	= <u>20</u>
Total	= 54 spaces

The amended apartment mix is:

18 x 1 bedroom apartments
19 x 2 bedroom apartments
<u>9</u> x 3 bedroom apartments or penthouses
46 Total

The configuration and size of the total units proposed is as follows:

Table 1 – Proposed Residential Development Mix

Apartment Type	Size Range (internal area, m ²)	Number of Units	Proposed Parking Spaces
1 Bedroom	48 – 55	7	7
1 Bedroom + study	57 – 68	11	11
2 Bedroom	66 – 85	5	5
2 Bedroom + study	100 – 119	14	16
3 Bedroom	–	0	0
3 Bedroom + study	120 – 154	7	14
Penthouse	213 – 227	2	4
Total		46	57

The table indicates that the proposed units are very large compared to the number of bedrooms proposed. As such the number of bedrooms is not the best indicator of parking requirements. In addition 32 of the non penthouse units are proposed to have studies which will result in increased accommodation potential.

In assessing parking requirements for residential apartments, a number of councils take studies into account by treating them as extra bedrooms. Taking such a view there would effectively be:

- 7 x 1 BR unit
- 16 x 2 BR units
- 23 x 3 BR units

Having regard to this effective provision of rooms in the development we have recalculated the parking requirements set out on the previous page and set these out on Table 2 below.

Table 2 – Calculation of Parking Requirements Based on Effective Accommodation Capacity

Apartment Type	No.	RTA Guidelines		Expert Real Estate Advice	
		Rate/Visit	Spaces	Rate/Visit	Spaces
1 Bedroom	7	1	7	1	7
1 Bedroom + Study	11	1.2	13.2	1	11
2 Bedroom	5	1.2	6.0	1	5
2 Bedroom + Study	14	1.5	21	2	28
3 Bedroom + Study	7	1.5	10.5	2	14
Penthouse	2	1.5	3	2	4
Total Spaces			60.7		69

Table 2 indicates that a parking provision in the range of 60.7 to 69 spaces would be appropriate for the site.

We understand that the Waverley code was formulated to constrain parking so as to reduce traffic generation. However RTA research indicates that in high density residential developments, there is not a direct relationship between car parking provision and traffic generation. In such cases many residents choose to live in areas where they can conveniently get about without cars, although they still choose to own cars for use on the occasions when their journey requires one.

The approved provision of only 39 parking spaces (or slightly more for the modified mix) would be well below market expectations and is based on Waverley Council's very generic parking code that does not take into account the circumstances of a particular development. The important circumstances in this case are that:

- It is essential that residential parking needs be fully met on site given the strong concerns expressed by residents in relation to possible impacts on the already congested on-street parking in the area.
- The Hotel Bondi (178 Campbell Parade) redevelopment was approved by Waverley Council in 2009 to provide 1.5 parking spaces per unit. The provision rate by unit type was:
 - 1 bedroom – 1 space per unit
 - 2 bedrooms – 1.4 spaces per unit
 - 3 bedrooms – 1.75 spaces per unitFor the subject proposal, this would equate to 60 parking spaces.
- Considering the matter from first principles, the two bedroom units in the subject development would typically require more than one parking space/unit because of their size.
- A three bedroom unit in Bondi in a prestigious new development would require a minimum of two spaces (penthouses quite often seek more).
- The City of Sydney LEP allows considerable more car parking in the Sydney CBD although public transport is very much better than at Bondi Beach. This recognises that people in convenient locations still tend to own cars and want off-street car parking although they use their cars much less than people living in outer suburban areas. The Sydney LEP allows the following car parking:
 - 1 bedroom – 0.5 space per unit
 - 2 bedrooms – 1.2 spaces per unit
 - 3 bedrooms – 2.0 spaces per unitFor the modified mix of apartments 50 resident spaces would be allowed and 9 of the one bedroom apartments would need to rely on on-street parking.
- Census statistics indicate that even for established normally sized older style apartments, the Waverley DCP would under provide parking by about 12 percent.
- The proposed apartments in the Hall Street development would be of a much higher standard than the average walk up unit in Bondi and hence would generate a higher need for car parking, and
- Importantly, it is not necessary to severely constrain car parking provision in a high density residential development as there is an inherent tendency in these for low traffic generation, irrespective of the car parking provision.

From the above we conclude that it would not be unreasonable for the project to provide 60 resident spaces as per the approved Bondi Hotel development. However a practical compromise provision that would minimise impacts on the local on-street parking situation would be 57 resident parking spaces as set out on the second page of this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'B Masson', with a long horizontal flourish extending to the right.

Bruce Masson
Director Transport Planning