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Contact: Janice Buteux-Wheeler

Reference: MP 10_0057 MOD 3 /
4 October 2011

Attention: Mark Brown
Mark.Brown@planning.nsw.gov.au

Dear Mr Brown

Council comments in response to *notification of modification request to amend Condition B1A(f) and B12(a) at 132-138 Killeaton Street, St Ives (MP 10_0057 MOD 3)*

In response to the notification of modification request to amend Condition B1A(f) and B12(a) at 132-138 Killeaton Street, St Ives, Council provides the following comment:

Parking

The proposed amendment will reduce the visitor parking provision from 75 spaces to 48 spaces, with existing resident parking spaces to remain the same.

The visitor parking provision of 75 spaces was made in accordance with Council's DCP (Town Centres) 2010, as well as Council's DCP43 (Car Parking), which required visitor parking at the rate of 1 space per 4 dwellings. The proposed amended visitor parking provision of 48 spaces equates to a visitor parking provision at the rate of 1 space per 6.2 dwellings (approx), which is lower than both Council's DCP (Town Centres) 2010 and Council's DCP43.

The applicants amended proposal relies upon the proposed amended visitor parking provision rate being consistent with RTA guidelines for high density development, and cites ABS data (2006) for vehicles parked in flats/units/apartments in Ku-ring-gai as supporting information.

The analysis of 2006 ABS data is probably representative of activity in the rail corridor, which is where the majority of flats/units/apartments would have been located in 2006. Therefore, it is unlikely that this data is an indication of vehicles parked in flats/units/apartments in St Ives. Further, Council's Integrated Transport Strategy (<http://www.kmc.nsw.gov.au/www/html/4082-integrated-transport-strategy.asp>) shows that rail station travel zones have a higher mode split to rail/walk for journeys to work. This indicates that areas like St Ives are still relying substantially on cars as their main mode of travel. Analysis of Travel Zones 2553, 2554 and 2557 would be better indicators of activity in this area.

While a reduction may be appropriate in a Ku-ring-gai town centre that is supported by a combination of rail station, bus services and local employment/core retail and commercial services; it is considered that visitor parking rates in St Ives should be retained at a ratio of 1 space per 4 dwellings. This is based upon the above, but of equal importance, while St Ives has a number of relatively good frequency bus services, it does not have a rail station nor significant local employment (apart from retail activities in the town centre itself). Further, the site is some 600m in a straight line (or 700m walking distance) from the retail core (intersection Mona Vale Rd and Memorial Ave), and as such the site is unlikely to benefit from multi-purpose trips from visitors to the town centre which may also be visitors to the apartments. Failing to provide adequate visitor parking may result in impacts on-street and to surrounding residents.

Deep Soil Landscape Area

The proposed amendment will increase Deep Soil Landscape Area from 40.1% to 40.4%.

A Deep Soil Landscape Area compliance plan should be provided by the applicant. This would enable an assessment of the calculated DSLA, and allow the calculation to be verified against the existing approval. The provision of the above plan assists in identifying the elements of the proposal that are excluded from the DSLA calculation, provides certainty and clarity, and allows comparison in relation to the current proposal against previous and future modifications.

Should you wish to discuss any of the above comments please do not hesitate to contact the undersigned.

Yours faithfully,

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