

Steve Evans - Director, Environmental Planning & Community
8am to 5:30pm Monday to Friday

6 October 2011

MR MICHAEL WOODLAND
DIRECTOR, METROPOLITAN & REGIONAL PROJECTS SOUTH
DEPARTMENT OF PLANNING & INFRASTRUCTURE
GPO BOX 39
SYDNEY NSW 2001

(Your Ref: MP10_0177 MOD 3)

Dear Mr Woodland

**RE: APPLICATION FOR MODIFICATION OF MAJOR PROJECT APPROVAL UNDER
SECTION 75W
14-18 BOONDAH ROAD, WARRIEWOOD**

Please find enclosed Pittwater Council's submission to the Application for Modification of the Project Approval (MP10_0177 MOD 3) at 14-18 Boondah Road, Warriewood.

If we can be of any assistance please do not hesitate to contact Liza Cordoba (Principal Officer Land Release) on (02) 9970 1150 or myself on (02) 9970 1134.

Yours faithfully



Steve Evans
DIRECTOR, ENVIRONMENTAL PLANNING & COMMUNITY

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**Submission to Department of Planning &
Infrastructure to MP10_0177 (MOD 3) at
14-18 Boondah Road, Warriewood**

Prepared by Pittwater Council 6 October 2011



PITTWATER COUNCIL

EXECUTIVE SUMMARY

The current Modification Application does not contain sufficient information to justify the changes proposed without diluting the integrity of the PAC's determination.

Application MP10_0177 MOD 3, the subject of this submission, and its lack of consistency with MP09_0162 MOD 1 results in a confused 'picture' of the cumulative implications resulting from the various modifications.

The amendments sought by Meriton under MP10_0177 MOD 3 are significantly divergent from the PAC decision of 18 January 2011, particularly as PAC dismissed any reduction in car parking rates and required the development to provide car parking in accordance with *Pittwater 21 DCP*. Logically, in reintroducing its proposal to reduce car parking rates for Stage 1, this Application needs to clearly demonstrate and introduce new information demonstrating why the PAC's decision was wrong. This has not been done.

Through this Modification Application Meriton seek to overturn the PAC's decision relating to quantum of car parking. In this regard, the PAC in its report of 18 January 2011, having noted that "Pittwater faces unique transport challenges", states:-

"Having regard to the challenges of road access and public transport in the area, the proposed parking provision in the concept plan is considered insufficient. The Commission believes the parking rates required by Council's DCP 21 are more appropriate and should apply to the site."

The information submitted is significantly deficient and does not reasonable demonstrate why a reduction in car parking rates should now be accepted by the PAC. The residential parking rates reinforced by the PAC's approval of 18 January 2011 must be upheld, for the reasons detailed in Council's Submission.

To do otherwise without sufficient justification would significantly depart from an orderly and logical determination process. The consequences of such a departure would create traffic and parking implications that, in turn, affects the amenity of future residents of this



and surrounding developments which is untenable for residents and the community alike.

DESCRIPTION OF APPLICATION

The Application Form describes the proposed modification (MP10_0177 MOD 3) as "Amend Condition B13 pertaining to car parking provision." The Applicant specifically seeks to:

- Modify the rate of carparking two bedroom apartments from 2 car spaces per unit to 1.5 car spaces per unit.
- Modify the number of visitor car parking spaces.

The amendment to Condition B13, recently amended under MP10_0177 MOD 1, is as follows:

- (a) ~~A total of 174 car spaces to be provided within the basement, including a minimum 46 visitor parking spaces.~~ **A total of 370 car parking spaces are to be provided within the basement, including a minimum of 33 visitor parking space.** Visitor parking shall include a minimum of 2 spaces designated for persons with a disability. The design and construction of the parking area and the parking spaces must be in accordance with AS2890.1 and AS2890.6.
- (b) Secure bicycle parking is to be provided for 98 bicycles on site, designed and constructed in accordance with AS2890.3.
- (c) Storage areas for each dwelling are to be provided within the unit and/or basement or part lot.
- (d) ~~The 362 parking spaces in a stacked formation shall be allocated to the 2 or 3 bedroom units, ie. 2 stacked spaces must be allocated on title to a single apartment.~~ **The 108 parking spaces in a stacked formation shall be allocated to the 2 or 3 bedroom units.** All studio and 1 bedroom units, which are only allocated 1 parking space, must be provided with a single unstacked space. ~~The 46 visitor parking spaces must not comprise stacked spaces.~~ **33 visitor parking spaces must not comprise stacked spaces.**

Plan Drawing 04 Rev E accompanies the Application, and details the car park layout in a single car parking level. This plan also deletes the access to the basement parking from the internal road presumably to accord with the proposed modification of the Concept Approval, MP09_0162 MOD 1, which seeks to, inter alia, delete the internal road.

MATTERS RAISED

(1) How does MP10_0177 MOD 3 impact on overall site/development, given the concurrent MP09_0162 MOD 1?

MP09_0162 MOD 1 is also being assessed by the Department regardless which has development changes that impact on the project approval.

The sequence of assessment and determination of the two Modification Applications must be carefully considered:-

- MP10_0177 MOD 3 is specific to the parking provision for the approved 226 dwellings and if considered first, will have the benefit of limited kerbside parking along one side of the internal road. The plan for this modification however, deletes an access to the basement seemingly in anticipation of the deleting of the internal road the subject of MP09_0162 modification application.

MP09_0162 MOD 1 seeks deletion of the internal road and associated parking on this internal road. Council contends that the consequences of the deficiencies in parking spaces for the development proposed differentially between the two modification applications (see paragraph below) is further exacerbated by the proposed deletion of the internal road, resulting in traffic congestion and increased demand for the limited kerbside parking within the local road network.

- There is an inconsistency in the changes to parking rates sought between the two Modification Applications:
 - MP09_0162 MOD 1 seeks a lesser parking rate of 1 space per 2 bedroom units whilst MP10_0177 MOD 3 proposes a rate at 1.5 spaces per 2 bedroom unit.
 - MP09_0162 MOD 1 seeks a lesser visitor parking rate of 1 visitor space per 10 dwellings as compared to the 1 visitor space per 7 dwellings proposed by MP10_0177 MOD 3.

Council contends that changes to the PAC approval relating to the deletion of the internal road (which is capable of accommodating a degree of parking) and the reduction in carparking rates associated with MP09_0162 MOD 1 be considered and determined prior to MP 10_10177 MOD 3.

(2) Insufficient information to support the proposed change in car parking rate that was already dismissed by the PAC

The proposed changes in the car parking rate are identical to the original application submitted by Meriton for its Preferred Project, and subsequently rejected by the PAC in its determination on 18 January 2011.

The basis of the amendment sought through MP10_0177 MOD 3 apparently stems from a statement by the Sydney Regional Development Advisory Committee (SRDAC) to a Part 4 DA for Stage 2 (withdrawn) on the subject site where SRDAC advised that 'the parking provision should more closely align the RTA guidelines.' The DA was lodged with Pittwater Council for consideration however, no formal SRDAC advice has been given to Council with this DA, now formally withdrawn. Notwithstanding, the statement is not sufficient justification demonstrating why the resident car parking rate and overall car parking spaces should now be reduced given that PAC already gave full consideration of RTA standards and the RTA's support for a reduced car parking provision in its January 2011 determination.

Pittwater Council asserts that the carparking rates under *Pittwater 21 DCP* are consistent with the RTA's *Guide to Traffic Generating Developments* for medium density residential flat buildings ("RTA Guide") as the parking rates are established with consideration of the specified factors influencing local demand, namely public transport accessibility, geography, socio-economic, the locality and large development, and visitor parking. Council's response to each determining factor is as follows:

a) Public transport accessibility

- The high rate of car ownership per dwelling/household in Pittwater, see Appendix 1, is primarily due to socio economic factors and the fact that the

existing limited bus system does not provide a viable and convenient alternative to the use of the private car.

- The existing bus service to the City in Macpherson Street is adjacent to the site, however this bus service does not provide access to many areas of Pittwater, Warringah and adjacent Council areas (such as Chatswood and Macquarie Park), and is irregular out of peak hours, particularly at night and during weekends.
- The Transport Corridor operating in Pittwater Road is approximately 1km from the development site. Over the 1km length, only 250 metres of footpath has been constructed between the development site and Pittwater Road. Additionally, the section of Macpherson Street east of the site is currently a rural road prone to frequent flooding, and will only be upgraded when local development contributions are received to fully fund the upgrade of this section of Macpherson Street.
- The current rural conditions of section of the pedestrian walk together with the distance to the Strategic Bus Corridor (at Pittwater Road) will, in fact, discourage public transport usage. Further, these conditions do not comply with requirements established and adopted by various State Departments, including the Department of Planning & Infrastructure, Department of Health, Department of Transport, and Department of Trade & Investment Regional Infrastructure & Services (Trade and Investment).
- The lack of direct cross-regional public transport services for which comfortable bus interchanges are available associated with the crowding and extended travel times make the few existing services unattractive to Pittwater residents, resulting in private cars being the preferred choice of travel mode (includes travel to work trips to employment centres in adjacent Council areas where the aim of subregional plans is for these trips to be by public transport). In fact, recent proposals by Sydney Buses have included suggestions to cease vital services to areas off the main roads as they were not profitable (steep terrain and narrow roads mean Sydney Buses cannot access many areas, forcing dependence upon cars by the residents and their visitors).

- The RTA has no current proposals to upgrade any main road servicing Pittwater, Warringah or adjacent Local Government Areas to increase the traffic capacity in the foreseeable future.
- While the Metropolitan Transport Plan identifies Pittwater Road and Mona Vale Road as transport corridors (bus only lanes are being introduced to Pittwater Road), the additional buses being provided by this Plan to service this area simply reduces the current level of crowding and reduce travel times especially on peak hour and late night services and do little to improve the attractiveness of the service due to ongoing passenger congestion south of Dee Why (including Military Road) and further, there are almost no services on Mona Vale Road. The Metropolitan Transport Plan does not propose to increase the capacity of Pittwater Road, Mona Vale Road and Wakehurst Parkway to facilitate improvements to public transport.

b) Geography

- The Pittwater Council area is large, spread out and isolated from the rest of Sydney with all access being via only three main roads which are heavily congested. Sydney GPO is approximately 30km from development site. The current bus timetables estimate a travel time of 55 minutes (for buses only) during the peak period.
- Internally, much of the terrain is steep so that bikes/walking/public transport is not realistic options. For this reason, cars remain the transport option of choice for all residents (including future residents of this proposed development) to visit friends, obtain goods/services and travel to work journeys both within Pittwater and to other Local Government Areas.
- The terrain and geographical location of Pittwater does not make it a reasonable conclusion to reduce the resident parking rate below that specified in *Pittwater 21 DCP*.

c) Socio-economic

- Pittwater residents/households are generally mobile and affluent, who can afford and demand private vehicles to support their lifestyle, and for convenient access to the services/facilities they use in Pittwater and the rest



of Sydney. This desire cannot be satisfied by the existing public transport system evident in the Pittwater LGA.

- The future residents of this development will experience the same difficulties and needs. It is unreasonable and inappropriate to reduce the resident parking rate below that specified in *Pittwater 21 DCP*.

d) Locality and large developments

- On-street parking opportunities in Warriewood Valley, particularly in the streets surrounding the site are already extremely limited. With the exception of Macpherson Street west of the site, currently the sections of Macpherson Street east and Boondah Road south are rural roads.
- There is evidence that demand exceeds supply in adjacent developments where the DCP parking rates were applied.
- A reduction in the resident parking rate is unreasonable as there would be significant parking shortfall. This will result in congestion in surrounding streets as people try and park in available limited kerbside parking and, in turn, adversely impacting the safety and amenity of residents in the surrounding area.

e) Visitor parking

- Council, in its Submission dated 8 October 2010 in regard to MP09_0162 & MP10_0177, considered the RTA rate of 1 space per 5 dwellings for visitor parking may be appropriate for the following reasons:
 - (i) In this instance, it reflects a more accurate representation of the nature of visitations likely to occur to a development of this size in Warriewood Valley and
 - (ii) Some reliance on on-street parking is acceptable in principle; the on-street demands for visitor parking for a development of this size must be able to be satisfactorily accommodated on the internal road system of the development site, with no adverse amenity or safety implications.
- The recently approved modification, MP10_0177 MOD1, now requires 46 visitor parking spaces and complies with the RTA rate of 1 visitor space per 5 dwellings (for the approved 226 dwellings).

- MP10_0177 MOD 3 however proposes 33 visitor spaces, resulting in a shortfall of 13 visitor spaces. The parking rate is 1 visitor space per 7 dwellings, based on a rate typically applied to high residential developments in centres characterized by a high level of public transport accessibility and surrounding high density land uses such as the Sydney CBD and North Sydney.

Bus services routes in proximity are insufficient to warrant public transport accessibility credit as the services are in hourly intervals and therefore must be discounted as providing high level of public transport accessibility. Additionally, the PAC approval clearly gives approval for a medium density development not high residential.

The parking rate that must be applied is the RTA rate of 1 visitor space per 5 dwellings, as already imposed by the PAC.

- The Applicant contends that additional to the 33 visitor spaces, 2 spaces for emergency vehicles and a designated space for vehicle washing will be provided to cater for this development and the parking provision satisfactory for 226 dwellings. The proposed shortfall in visitor parking spaces is unreasonable and inappropriate at this location for the reasons mentioned above. This should be considered in the light of the proposed concurrent but separate modification of the Concept Approval that seeks to delete the internal road between Boondah Road and MacPherson Street that provides, under the PAC approval, a degree of on-street visitor parking opportunity.

The Applicant relies on a SRDAC alleged statement relating to this site which has not been seen. Such a statement by the SRDAC is inconsistent with its own criteria for reducing car parking rates and be at odds with the local "unique transport challenges" as stated by PAC in it's determination.

The applicant's attempt to use of Census Information to depict resident car parking demand cannot be relied upon to support a reduction in car parking rate in the light of published Pittwater data as per Appendix 1.

There is insufficient demonstrable justification to show cause as to why the PAC rejection of a reduction in car parking provision should be overturned. Certainly, as the

cumulative impact of amendments to both the Concept Plan and Stage 1 are considered, it is appropriate to uphold the PAC decision for resident and visitor parking being provided in accordance with the rate in *Pittwater 21 DCP* and 1 visitor space per 5 dwellings in accordance with the *RTA Guide* respectively.

(3) Numerical Shortfall in Car Parking Provision

Traffix Transport and Traffic Planners were commissioned to review this latest Modification Application. Their Report (in Appendix 2) forms an important part of Council's submission.

Numerical shortfalls in resident parking (334 spaces proposed, instead of the 426 approved) and visitor spaces (33 spaces, instead of the 46 approved) are evident given the car parking rates are proposed to be reduced. This results in a total deficiency of 105 parking spaces for the 226 dwellings that, in turn, will increase demand for the limited number of kerbside parking that exists in adjoining streets. For the 226 dwellings alone, the deficiency in parking spaces equates to 630 metres in length of kerbside parking of which there is no latent capacity to be accommodated internally or within the local road system. This would be further exacerbated should the internal road be deleted as is suggested in Modification Application MP09_0162 MOD 1.

Meriton's proposal to reduce residential parking and visitor vehicle parking below that required under *Pittwater 21 DCP* and the *RTA Guide* respectively is unacceptable as this places a heavy reliance for parking to be provided off the site in the surrounding street system within which there is simply no surplus capacity.

Approval of MP10_0177 MOD 3 sets a dangerous precedent for the remainder of the development for this site, 14-18 Boondah Road Warriewood as well as other developments in the Warriewood Valley Urban Land Release, with major carparking deficiencies. The combined impact would swamp the Warriewood Valley and surrounding areas with spill over cars requiring parking spaces. This could also adversely affect parking areas associated with adjoining sportsgrounds and shopping centres, and result in serious safety and amenity implications as raised by Council's Traffic consultant (Traffix).

(4) Layout of the Car Parking Area as shown on Drawing DA04 Rev E, dated 2/15/2011

Approval has been granted to a single car parking level catering for 229 dwellings. Nonetheless, Council reiterates its concern that the arrangement of a single car parking level and the use of tandem spaces results in manoeuvrability issues and inefficiency that in turn, impacts user amenity with flow-on effects on (on-street and on-site) parking, safety and traffic congestion in this parking level and the local road network.

The proposed changes to the basement car parking plan raises the following concerns:

- Numerical shortfall in resident and visitor spaces,
- Location of emergency spaces/carwash, and visitor spaces,
- Number and location of storage areas,
- Location of the bicycle parking spaces.

(a) *The implications to the numerical shortfall in resident and visitor spaces are already addressed in the previous section (3) above.*

(b) *Location of Spaces for Emergency Vehicles, Car Washing Bay and Visitor Spaces*
The single car parking level together with the dispersed location of the visitor spaces and hidden location of the emergency vehicle spaces makes the parking area unreadable to visitors that, in turn, have flow-on effects on parking and traffic.

7 of the 33 visitor spaces (shown on the plans as V27 to V33 inclusive) are not conveniently located nor easily identifiable in the car parking area. This issue combined with the shortfall in parking spaces, will result in an inability or reluctance by visitors to park on-site thus creating further on-street parking pressure.

Uncertainties also remain in regard to:

- sufficient clearance being provided within the car parking level, to accommodate emergency vehicles,
- what is contemplated in "shared area" between the 2 spaces for persons with a disability, V1 and V2.

As a minimum, all visitor parking spaces and the spaces allocated to emergency vehicles must be easily identifiable and available for that purpose. These spaces must not be allocated for residents parking or allocated to specific dwelling(s).

Additionally, no obstructions are to be placed between the 2 spaces allocated for persons with a disability.

(b) Number and Location of the Storage Areas

Council reiterates its previous concern to the shortfall in lockable storage areas. 189 lockable storage areas are shown, resulting in 37 dwellings not having a dedicated lockable storage area in the basement in which they can store bulky items that cannot fit in cupboards/areas that may be provided in the dwellings.

Of the 189 storage areas provided, concern is raised to their location behind another row of storage areas, incorporating dead ends and blind corners creating unsafe conditions for users.

226 lockable storage areas (1 storage area per dwelling) must be provided to afford the future residents of this development basic facilities expected in a new development particularly of this scale.

(c) Location of Bicycle Parking Spaces

The 98 bicycle spaces shown on the plans must be available to all users of this development. The condition should be amended accordingly.

CONCLUSION

This Application seeks to undermine the integrity of the original PAC decision. The applicant implies that PAC erred in its original decision. The PAC in its determination report clearly articulates its reasoning for applying the local DCP 21 car parking controls. The applicant has submitted no justification for a change in car parking rates. The proposed modification conflicts with the concurrent application to modify the Concept Approval.



Approval of MP10_0177 MOD 3 will result in significant traffic congestion within the local road network as the demand for limited on-street parking is greatly increased given the total shortfall in parking provision proposed by this large development.

**Submission to Department of Planning &
Infrastructure to MP10_0177 (MOD 3) at
14-18 Boondah Road, Warriewood**

APPENDIX 1 - Car Ownership, Extract from Pittwater
Local Planning Strategy-Pittwater Towards 2031



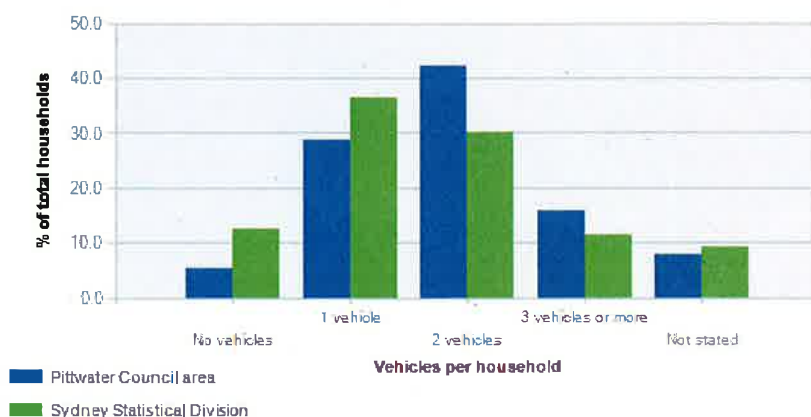
PITTWATER COUNCIL

4.5.11 Analysis of Car Ownership

Analysis of car ownership in 2006 shows 86.8% of households own at least one car. Overall, 28.7% of households owned one car, 42.2% owned two cars and 15.9% owned three cars or more. The major differences between car ownership in the Pittwater LGA compared to the SSD are a larger percentage of households with 2 vehicles (42.2% compared to 30.2%) and a smaller percentage of households with 1 vehicle (28.7% compared to 36.4%).

Figure 13: Car ownership, Pittwater LGA and SSD

Source: Informed Decisions, 2009



Residents in the Pittwater LGA have a high dependence relative to the SSD for private car ownership and use.

It is also understood that there are comparatively fewer people in Pittwater using public transport compared to the SSD. Most people in the region prefer the use of private vehicles and this trend can be attributed to several factors including a lack of viable alternatives, inconsistency of public transportation service and long travel times.

4.5.12 Forecast Housing Trends

The existing and expected future population profile and age structure as discussed in Chapter 4 (Our community) and the housing consumption patterns and housing supply and demand discussed below, are important considerations that inform the process of planning for future housing in the Pittwater LGA.

The three major household types in the Pittwater LGA, as shown in Figure 14, are couples with dependents, couples without dependents and lone person households. This trend in housing consumption is consistent with the Sydney Statistical Division. Figure 14 shows the number of different household types and how they are expected to increase between 2006 and 2021. The largest increases in households are forecast to occur in the couples without dependents and lone person household categories. Households consisting of couples without dependents are forecast to increase from 6,189 in 2006 to 7,905 in 2021, which is an increase of 27.7% (1716 households). Lone person households are forecast to increase from 4,623 in 2006 to 6,249 in 2021, which is an increase of 35.1% (1626 households). Households consisting of couples with dependents are forecast to increase from 7,915 in 2006 to 8,863 in 2021, which is an increase of 11.9% (948 dwellings), less than half the rate of increase expected from the aforementioned categories.

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**Submission to Department of Planning &
Infrastructure to MP10_0177 (MOD 3) at
14-18 Boondah Road, Warriewood**

APPENDIX 2 - Traffix Traffic and Transport Consultants



PITTWATER COUNCIL

Reference: 11.313v2

27 September 2011

Pittwater Council
PO Box 882
Mona Vale NSW 1860



Attention: Mr Chris Hunt, Director of Urban & Environmental Assets

Re: Meriton Part 3A Application, Warriewood 14-18 Boondah Road
Section 76W Application to Major Project No. 10_177
Stage 1 Car Parking Provision

Dear Chris,

We refer to the subject Modification and in particular to the Traffic Report prepared by Halcrow Traffic consultants, which outlines the justification for the proposed amendments. In this regard, we advise as follows:

■ Residential Parking for the Two Bedroom Units

We note that our previous submission dated 29th April 2010 in relation to the original Stage 1 Project Plan raised concerns over the reduction in parking for the two-bedroom units as then proposed, which was from 2.0 spaces/unit under DCP21, to 1.5 spaces per unit. These concerns were made in the context of the absence of any demonstration as to how the resultant increased reliance on public transport would be met. These concerns were presumably supported by the PAC in determining the Application and are reflected in the current approval which binds the parking provision to DCP21. In our view, these concerns, as raised in our original submission, remain valid in the context of the current modification.

The following points are emphasised:

- The basis of DCP21 parking rate of 2.0 spaces/unit needs to be understood if it is sought to be varied. The applicant has provided no consideration of the genesis DCP21 and its present relevance to local parking needs within Pittwater LGA.
- The RTA's Guideline refers to the ability of Council's to adopt local parking plans that more accurately reflect local needs. In this regard, Section 1.4 of the RTA's Guideline specifically states that the RTA's parking requirements are the minimum desirable requirement; while Council's parking codes reflect the minimum mandatory requirement (Section 1.4 refers). In our view, it is unreasonable to arbitrarily require compliance with the RTA Guideline, without a clear understanding of the basis of the DCP rate and the problems that might be



created by a departure from the DCP in this case, as well as in relation to any precedent that might be set by any approval that may be granted.

- It is noted that Halcrow accepts that the reduced parking will in turn reduce private car travel and hence traffic generation. The consequence is that these trips will be transferred onto public transport. In this regard, no assessment has been undertaken of the ability of existing buses to accommodate the expected demand from the development generally even if it is assumed that compliance with DCP21 is achieved, as per the current consent. In the event that DCP21 is not met, this will create a further demand on bus services;
- In the event that the DCP21 demand in fact occurs and insufficient resident parking is provided within the site, the consequence will be an unacceptable level of reliance on on-street parking. This will be exacerbated by the associated removal of extensive on-street parking that was previously proposed, arising from the deletion of the through site road connection. This is discussed further below in the context of visitor parking.
- It is emphasised that on-street resident parking relates to the effective full-time, long-term and effective permanent use of a public asset, which is inappropriate and unsound planning.

In summary, the decision of the PAC, which supported Council's DCP21 provision for residential parking for this development, should remain the relevant control so that the objectives that underpin DCP21 are not compromised. This is notwithstanding the views of the RTA which seem to overlook the importance of DCP21 which is a statutory parking instrument that is specifically attuned to local needs.

■ Visitor Parking

The Stage 1 development accommodates 226 units and on the basis of Council's DCP21 would require 76 visitor spaces, based on application of a rate of 1 space/3 units. The current consent is understood to require 46 spaces, based on a rate of 1 space/5 units. We note our previous advice that the reduced rate of 1 space/5 units is generally supportable as it reflects the RTA's requirement for medium density dwellings. This rate is also the same as the RTA's rate for high density developments in sub-regional centres.

However, we strongly oppose the adoption of any rate lower than 1 space/5 units for the following reasons:

- Council's DCP is arguably entitled to require parking for visitors to accommodate peak demands, rather than 'typical' demands based on the RTA's Guideline. Nevertheless, the rate of 1 space/3 units is high, and probably reflects demands above the 85th percentile demand level. As a minimum, the onus should be on the applicant to justify a departure from the DCP through surveys of a comparable development and to our knowledge, this has not occurred.
- The policy implications of a departure from the DCP and the implications for any precedent this would create is a matter that the applicant should address.
- The rate of 1 space/7 units referenced by Halcrow relates only to a high density residential dwelling in a regional centre, which includes the Sydney CBD and North Sydney. These centres are characterised by a very high level of public transport accessibility, as well as high density land uses where many people would walk. This is not applicable to Warriewood Valley.



- The previous scheme enjoyed a significant 'safety valve' provided by the extensive on-street parking that was available within the internal road linkages. The modified plans remove the internal through road, with deletion of a 600 metre long section of 7.5 metre wide roadway that would have accommodates up to 100 parking spaces, assuming 6 metres per space and parking on one side only. The net loss of up to 100 on-site spaces, which is additional to the loss of on-site visitor parking provision of 13 spaces (46 less 33 as now proposed) is a matter of concern.

■ Removal of Through Road

As discussed above, the deletion of the through road raises issues concerning parking supply for visitors, as well as residents should the demand for parking be higher than the DCP21 rates which we note are minimum requirements. The following matters are also raised:

- The deletion of the through site link reduces the ability of emergency vehicles to access the southern side of the development. This is a matter for assessment but is outside our area of expertise.
- The deletion of the through site link will reduce the permeability of the site by service vehicles, including removalist vans. It is unclear, for example, how removalist vans would gain convenient access to the southernmost buildings F, G and L.
- The road closures at both ends of the retained portions of internal road do not provide any turning area and will therefore result in unacceptable reversing movements, with attendant safety implications.

In summary, the consequence of the current modifications will be to impose unnecessary and avoidable pressure on on-street parking, to a degree that will be unacceptable and may introduce safety concerns. Please contact the undersigned should you have any queries or require any further information regarding the above.

Yours faithfully,

traffix

Graham Pindar
Director