



MERITON
MAKING LUXURY APARTMENTS
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18 October, 2011.

Mr Michael Woodland
Director, Urban Assessments
NSW Department of Planning & Infrastructure
23-33 Bridge Street
SYDNEY NSW 2000

Dear Mr Woodland

**SECTION 75W APPLICATION TO MAJOR PROJECT APPLICATION NO. 10_0177 FOR
RESIDENTIAL AND CHILD CARE DEVELOPMENT AT 14 – 18 BOONDAH ROAD,
WARRIEWOOD (LOT 20, DP 1080979) – REDUCTION OF BASEMENT CAR PARKING**

Construction of the above project is well advanced in accordance with the car parking rates established by the Planning and Assessment Commission (PAC).

It has always been our position that this development seeks to provide quality housing at far more affordable prices than currently available in the Warriewood Valley area. To this end, we have always maintained that providing 2 cars for every 2 bedroom unit is not financially viable and is a waste of resources due to a lack of demand for this amount of cars.

We have already constructed approximately 60% of the basement car park in accordance with the modified approval and this is leading to unnecessary excessive costs.

The Roads and Traffic Authority (RTA) Guidelines only require 1.2 car spaces for a 2 bedroom unit and this is all that is required. In this particular instance however, the changes being proposed are to the unbuilt portion of the basement car park, and if approved, in excess of 1.5 car spaces for every 2 bedroom unit will be provided because the majority of the basement structure has already been constructed in accordance with the Project Approval.

In response to the RTA and Pittwater Council issues raised in their submissions, please find our response below.

Roads and Traffic Authority Submission

The Roads & Traffic Authority in their submission dated 23 September 2011 do not support the reduction of visitor car parking spaces. However, the RTA does support our proposal of 1.5 car parking spaces for every two bedroom unit. The RTA have also placed a condition on single stacked parking spaces to be allocated to a single unit.

In light of the RTA submissions Meriton undertakes to amend the application as follows:

1. Visitor car parking spaces to remain at the rate of 1 space for every 5 units in accordance with the current modified approval.
2. Two bedroom car parking spaces will be provided at the rate of 1.57 car spaces per two bedroom units (an increase of 13 car spaces). This is above the RTA rate for 2 bedroom units.
3. Condition 13 of the Project Approval already requires a stacked car parking space to be allocated to a single unit to satisfy point 3 of the RTA submission.
4. The basement car parking plan has been amended to show no supporting columns within the aisles. This will satisfy point 4 of the RTA submission.
5. Basement car parking will be designed in accordance with the relevant Australian Standards listed in the Building Code of Australia which is already a condition of consent. This will satisfy point 5 of the RTA submission.

Response to Pittwater Council's Submission

Please find below a response to each of the items raised by Pittwater Council.

COUNCIL ISSUE 1

How does MP10_0177 MOD3 impact on the overall site/development, given the concurrent modification to the Concept Plan (MP09_0162 MOD1)

Council is primarily concerned with the following:

1. The amount of visitor parking being reduced, and
2. The proposed removal of the internal road under a separate modification to the approved concept plan was to also provide for visitor parking spaces.

Following a review of the development, we agree to retain the approved number of visitor car parking spaces, which removes the concerns of point 1 above.

With regard to point 2 above, the Preferred Project Report and Environmental Assessment Report of the approved Concept Plan makes no statement that visitor parking was to be taken up along the internal road. By reverting back to the approved rate for visitor parking in the basement, the removal of the internal road is of no consequence, because at all times the provision of visitor car parking generated by the development was approved by the PAC within the basement, and not along the internal road.

Council also note an inconsistency between the proposed modification to the concept plan and the proposed modification to the Project Approval for the provision of visitor and 2 bedroom unit

car parking rates. In response, the modification to the concept plan that is yet to go before the PAC currently proposes visitor parking at the rate of 1 per 10 dwellings, and will be amended to comply with visitor car parking at the rate of 1 space per 5 units. This will resolve the inconsistency concern of Council. Also, the application to modify the Concept Plan that reduces 2 bedroom car spaces will be amended I also be amended to adopt the RTA Guidelines.

There is no requirement of the PAC to consider the modification to the concept plan prior to the modification to the Project Application. By agreeing to build the basement visitor parking spaces as approved, the concept plan does not come into effect as there was no requirement to provide the internal road for visitor parking.

COUNCIL ISSUE 2

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

Council states that reference was made at the Sydney Regional Development Advisory Committee (SRDAC), that car parking should more closely reflect the RTA guidelines. At the time of preparing this response, the minutes of the meeting were yet to be released and therefore no further comment can be made.

Paragraph 3 on page 5 of Council's letter, states that the carparking rates contained in Pittwater 21 DCP are consistent with the RTA Guidelines. Council then proceed to discuss issues that were raised against the original application for the development back in 2010. With regard to Council stating their DCP being consistent with the RTA Guidelines, the following response is made.

Table 1 below compares the car parking rates of the RTA Guidelines for medium density housing against the Pittwater 21 DCP for medium density housing.

Table 1 – Comparison of RTA and Council Car Parking Rates

Land Use (Medium Density)	RTA	Pittwater Council	Consistency
1 bedroom unit	1 space	1 space	Yes
2 bedroom unit	1.2 spaces	2 spaces	No
3 bedroom unit	1.5 spaces	2 spaces	No
Visitor Parking	1 space per 5 dwellings	1 space per 3 dwellings	No

Source: RTA Guidelines and Pittwater 21 DCP

From the above table it is clear that with the exception of 1 bedroom units, the Council's controls are in NO-WAY consistent with the RTA Guidelines for medium density housing.

Council on pages 5-10 of their submission further elaborate on why their DCP is consistent with the RTA Guidelines. The above table clearly indicates there is no consistency with the RTA

Guidelines. Notwithstanding this, a response to each of the headings between pages 5 and 10 of Council's submission is provided as follows.

Public Transport Accessibility

Council Issue – The high rate of car ownership per dwelling is primarily due to socio economic factor, limited bus service, distance from transport corridor, rural conditions, lack of direct cross-regional public transport, RTA upgrades, and bus lane congestion

Response to the high rate of car ownership per dwelling

The Council is relying on the 2006 Car Ownership figures for all households in the Pittwater Local Government Area rather than on the dwelling type. By Council relying on car ownership for all households, the percentage of car ownership is significantly skewed towards 2 cars. This is because Pittwater has over 78% of all households living in a separate house as of the 2006 census. This shown in table 2 below which is taken from data available on Pittwater Council's website.

Table 2 – Dwelling Types as at 2006 Census

Occupied Dwelling Structure	Number	%
Separate House	15,434	78.1%
Medium Density	2,455	12.4%
High Density	1,603	8.1%
Caravans, cabins, houseboat	187	0.9%
Other	65	0.3%
Not Stated	12	0.1%
TOTALS	19756	100%

Source: Austalian Bureau of Statistics, Census Population and Housing, 2006 (Pittwater Council's Website 15 October 2011)

The skewing of the data towards detached housing as an argument by Council is further revealed in Table 3 below, which shows that 69.3% of households in a detached house have 2 or more cars, compared to 33.3% for flats.

Table 3 – Percentage of Cars Per Occupied Dwelling Type 2006

Car Numbers	0 cars	1 car	2 cars	3+ cars
Separate House	4.0%	26.6%	49.2%	20.1%
Flats	15.5%	51.1%	28.7%	4.6%

Source: ABS Commonwealth of Australia 2007.

From these figures alone it is evident that households in flats with more than 2 cars are half that of detached houses in Pittwater and negates Council's argument that there is a high proportion of households having 2 cars, when in fact units have half that of detached dwelling houses.

Furthermore, table 4 below equivocally shows that the number car spaces for dwellings in a 3 and four storey apartment building (which are being constructed on the subject site), have 1.25 cars per 2 bedroom unit, which is at odds with Council's argument that 2 cars for a 2 bedroom unit are required.

Table 4 – Number of cars per bedroom in a 3-4 storey Residential Flat Building (2006 Census)

Flat, unit or apartment in a 3 and 4 storey block						
No. Of Cars	0	1	2	3	4	Totals
Bedsitter per car	12	3	0	0	0	15
Number of cars	0	3	0	0	0	3
Number of cars per Bedsitter						0.20
1br unit per car	63	167	48	6	0	284
Number of cars	0	167	96	18	0	281
Number of cars per 1 bedroom unit						0.99
2br unit per car	88	446	287	18	4	843
Number of cars	0	446	574	54	16	1,090
Number of cars per 2 bedroom unit						1.29
3br unit per car	11	98	88	17	0	214
Number of cars	0	98	176	51	0	325
Number of cars per 3 bedroom unit						1.52
All Units	174	714	423	41	4	1,356
Number of cars	0	714	846	123	16	1,699
Number of cars per all bedsitters, 1, 2 & 3 br units						1.25

Source: 2006 Census of Population and Housing Local Government Areas and Number of Bedrooms in Private Dwelling (BEDD) by Dwelling Type (DWTD), Dwelling Structure (STRD) and Number of Motor Vehicles (VEHD)

It is clear from the above table that Council's argument of a high rate of car ownership for 3 and 4 storey apartments is not correct. Council states that the total households in the Pittwater Local Government Area have a high rate of car parking (2 cars per dwelling), when in fact this is not the case. From the above tables and particularly Table 4, there are only 1.25 car spaces per dwelling in a 3-4 storey apartment building.

This further provides evidence that Council's DCP is not consistent with the RTA Guidelines as shown in Table 1 or from the Pittwater 2006 Census. The proposed 1.57 car spaces for a 2 bedroom unit is higher than the 2006 Pittwater census and the slight above the RTA Guidelines of 1.5 spaces per 2 bedroom dwelling. On these grounds alone, the proposed rate of car parking for 2 bedroom units is consistent with the socio economic factors, established population data and the RTA Guidelines.

Response to Limited Bus Service

Submitted with the application to the Department of Planning and Infrastructure was a detailed list of times and maps from the NSW Government Transport Information Trip Planner website showing an entire range of bus services available directly from the bus stop on Macpherson Street directly in front of the site. A copy is also attached to **Annexure1** of this submission and clearly demonstrates adequate service for the future population.

It is also well known that the practice of Transport NSW is to increase bus services once demand has increased. We expect that as has happened in the past all around the Sydney metropolitan area, the number of buses and frequency will be boosted once the development is nearing completion.

Meriton is satisfied with a condition that requires the Applicant to approach the Government for more buses prior to the release of the final occupation certificate.

Response to Transport Corridor

Council is inferring that because the major transport route is over 1km away and there is localised flooding, people will be unable to reach public transport.

In response, a flooding event does not happen every day to suggest people are going to be forever stranded to use the bus service outside the site or along Pittwater Road. The work schedule of Council's Section 94 Plan shows that funds should have been collected to commence flood mitigation works. Council have yet to commence, which is not in accordance with the timing of their Section 94 Plan.

Notwithstanding this, the proposed car parking spaces for 2 bedroom units is in accordance with the RTA Guidelines and Census, which is considered adequate. Not everyone is going to catch a bus as inferred by Council's submission.

Response to Rural Conditions

Council suggests that because of the rural conditions, people will not walk to Pittwater Road for catching a bus.

In response, Council is forgetting that there is a bus stop right in front of the site that will take passengers to work and connecting routes along Pittwater Road – so there is no need to walk to Pittwater Road.

Also, the locality has very little rural conditions left. Warriewood Valley has almost been entirely transformed into a residential neighbourhood and will continue to do so. One also has to go back to the point that 100% of residents are not going to use public transport.

Response to Lack of Direct Cross Regional Public transport

Annexure 1 also contains a copy of the bus maps that demonstrates suitable cross regional services. Currently, buses depart directly in front of the site to the Sydney CBD, Chatswood CBD, Mona vale Town Centre, Manly and the Belrose Business Park. These buses connect to the main employment, business and retail centres.

It is also important to note that nearly 40% of residents in the Pittwater local government area as of 2006 work in their own area. Therefore the demand for cross regional bus services is not strong as Council seem to think. This is shown in the table 5 below, which is sourced from Council's website on the 15 October 2011.

Table 5 – Employment Location of Pittwater Residents (2006)

Top 10 Local Government Areas of employment for residents in Pittwater Council, 2006			
Rank	Local Government Area	Number	Percent (%)
1	Pittwater (A)	10,614	38.9
2	Warringah (A)	4,737	17.4
3	Sydney (C)	2,616	9.6
4	North Sydney (A)	1,000	3.7
5	Willoughby (C)	915	3.4
6	Ryde (C)	637	2.3
7	Manly (A)	629	2.3
8	Ku-ring-gai (A)	519	1.9
9	Hornsby (A)	280	1.0
10	Botany Bay (C)	277	1.0

Response to RTA Upgrades

Council states that 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.

Perusal of the RTA website contradicts this statement of Council. As of the 16 May 2011, the Member for Pittwater announced works beginning to widen Mona Vale Road to four lanes, where it currently is two lanes. The media release is attached to **Annexure 2**

As of the 15 October 2011, the RTA is commencing a \$10.6m project to upgrade the Spit bridge opening infrastructure to improve the reliability of opening. The project is to commence November 2011 (refer to **Annexure 3**).

There are currently works being undertaken or recently completed to improve the Spit/Military Road traffic flows. An overview map from the RTA website is shown below.

As evident above, the RTA has announcements that main roads are in fact being upgraded to improve traffic capacity and traffic flows that will directly assist the Northern Beaches.

Council infer that the proposed bus lanes from Mona Vale to the Sydney CBD will become further congested from the proposed reduction in 2 bedroom and visitor parking spaces.

Geography

Response

The terrain of the Pittwater Local Government Area should be of no consequence, and is directly comparable to the Hornsby Local Government Area which requires only 1 car space for units in medium to high density development (refer to **Annexure 5**).

Notwithstanding this, cars of today “should be able” to accommodate the “steep” terrain.

Socio-Economic

Council Issue – Pittwater residents/ households are more affluent and mobile and demand private vehicles to support their lifestyle.

Response

Council has provided no evidence to suggest this is the case. The reality points to the opposite. Households in separate houses are more than likely to have less income than a household in a unit.

Less income of households living in a unit is reflected in the table 4 above which shows car ownership being less and the reality that the purchase price of a unit will be far less than that of a detached house in the Pittwater Local Government Areas.

Therefore, the evidence points to a lower socio-economic group of households in 3-4 storey apartments, which have fewer cars. This is not consistent with Pittwater Council's suggestion above.

At the time of writing this submission, the Australian Bureau of Statistics was putting together a table showing household income of 3-4 storey flat buildings compared to detached houses, and will be made available upon receipt to remove any argument of Hearsay.

Locality and Large Developments

Council Issue – On-street parking limited east and south of the site/ demand outstrips supply for existing complying developments/reduction in resident parking would result in congestion in surrounding streets for car parking spaces.

Response

Council point out that there is limited parking east and south of the site and does not mention the fact that on-street parking will be available along the site frontage for in excess of 26 spaces.

This statement should not be taken into account as we are continuing to comply with the approved rate of visitor car parking. All complying visitor parking will be provided in the basement, and therefore not reliant on off street car parking.

Council has provided no evidence of existing complying developments where demand for car parking spaces has exceeded supply – only hearsay at this stage.

Visitor Parking

Council Issue – Do not support reduction in visitor parking for a number of reasons.

Response

Meriton is reverting back to the approved conditions applying to visitor car parking requirements, which will then address Council's concerns.

Page 9, paragraph 5 of Council's submission, states that the Census information used to depict car parking demand cannot be relied upon given the car parking rate published in Appendix 1. Meriton data has come from Halcrow Consulting which has sourced the information from the 2006 census. The data contained in Appendix 1 of Council's submission only provides an overview of all household 2006 data. The data presented in this submission has been obtained from Council's website itself, the Roads and Traffic Authority website, and Transport NSW.

COUNCIL ISSUE 3

Numerical Shortfall in car Parking Provision

Council raise concern to the total number of visitor and resident car parking that will place heavy reliance on on-street parking.

The matter of a significant shortfall in parking is now addressed. Visitor parking will revert back to the approval, and it has now been shown throughout this submission that car parking for 2 bedroom units is only matching the current characteristics for 3-4 storey residential flat buildings that already exist in the Pittwater Local Government Area for this stage of the development.

COUNCIL ISSUE 4

Layout of the Car Parking Area Drawings

Council has raised a number of issues which are addressed below.

- ***Numerical shortfall in resident and visitor spaces***

There is no shortfall in resident parking when compared against the RTA Guidelines or the 2006 Census. There is also no short fall in visitor car spaces as we will comply with the current approval to provide 1 visitor space per 5 dwellings.

- ***Location of emergency/carwash and visitor spaces***

There are two emergency vehicle spaces located around the corner of the entrance ramp. A condition can be imposed that requires suitable signage at the ramp end to direct emergency vehicles to the allocated spaces.

The location of the carwash bay is suitably removed from visitor and resident spaces to avoid any interference.

Visitor spaces are located closed together and near lobbies for convenient access to units above.

- ***Number and Location of Storage Areas***

Council confirm that this issue was raised as part of the previous modification approval by the PAC. A detail report and plans were submitted to the PAC as part of the previous modification showing how each storage room was allocated to a separate unit. Condition B13(c) also requires the development to provide storage within the unit or basement. There is no modification to amend Condition B13(c) and compliance is therefore still required.

- ***Location of the bicycle parking spaces***

The location of bicycle spaces have not changed with the exception of additional spaces being located between car spaces 256 and 257 that is next to a lobby for easy access to units above.

AMENDMENT TO CONDITIONS

The decision to retain visitor spaces in accordance with the existing consent and allocate 2 bedroom car spaces slightly above the RTA Guidelines changes the total car parking numbers and is reflected in the amended condition below.

B13 Car and Bicycle Parking Provision and Storage (Approval MP10_0177) dated 15 July 2011

- ~~A total of 474 car parking spaces are to be provided within the basement, including a minimum of 46 visitor parking space.~~ **A total of 395 car parking spaces are to be provided within the basement, including a minimum of 46 visitor car parking spaces.** Visitor parking shall include a minimum of 2 spaces designated for persons with a disability. The design and construction of the parking area and parking spaces must be in accordance with AS2890.1 and AS2890.6.
- Secure bicycle parking is to be provided for ~~98~~**100** 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.

~~The 362 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 120 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 be comprise stacked spaces.

CONCLUSION

It has been recognised that visitor parking cannot be reduced on the site. However, the proposed rate of car parking for 2 bedroom units more reflects the current rate for 3-4 storey apartment buildings in the Pittwater Local Government Area. In fact, the proposed car parking rate of 1.57 per 2 bedroom unit is above the 1.29 spaces of the 2006 census. Meriton are therefore providing 52 more 2 bedroom car spaces in comparison to the 2006 census and is supported by the Roads and Traffic Authority as shown in **Annexure 6**.

The basement car park structure is nearing completion and the finished parts have been constructed in accordance with the Project Approval (see **Annexure 7** for amended basement car parking plan). Changes being proposed are to the unbuilt portion of the basement to provide for a more efficient layout that is affordable to construct. The future direction of car parking rates for the remainder of the site will be governed by the RTA Guidelines.

As we are currently constructing the basement, we appreciate a way you could expedite this application.

Yours faithfully

MERITON APARTMENTS PTY LIMITED



WALTER GORDON

Manager Planning and Development