



Reference: 10.151

**traffix**  
traffic & transport planners

Wednesday, 20 August 2014

suite 3.08  
level 3 46a macleay street  
potts point nsw 2011  
po box 1061  
potts point nsw 1335  
t: +61 2 8324 8700  
f: +61 2 9380 4481  
w: www.traffix.com.au  
director graham pindar  
acn: 065132961  
abn: 66065132961

Urbis  
Tower 2, Level 23 Darling Park  
201 Sussex Street  
SYDNEY NSW 2000

Attention: Ian Cady, Associate Director - Urban Planning

**Re: MP10\_0122 MOD 3 and MP10\_0113 MOD 3  
Corner Herring Road & Epping Road, Macquarie Park Macquarie Park  
Response to Council Submission to DoP dated August 29014**

Dear Ian,

We refer to the subject development and in particular to the matters raised by Council in its letter to the DoPI dated 7<sup>th</sup> August 2014. Our response to the matters raised is summarised below, noting that these comments are intended to be incorporated into your over-arching matrix. For simplicity, we have numbered the matters raised in Council's table consecutively:

**Item 1: Parking is lower than the rates in major Sydney Centres:**

The comparison provided between the proposed rates and rates in other regional and sub-regional centres is intended to provide a general planning context. It is a legitimate planning exercise to understand the range in parking rates that applies to high density residential development across Sydney. This is not offered to enable a direct comparison with any other location, but is a reflection of policy as is being applied generally throughout Sydney. The conclusions reached are highly valid, namely that there are many centres that enjoy superior access to public transport and a broad range of services that are available at the subject site, yet which permit higher parking rates than are being sought.

It is acknowledged and accepted that parking rates need to be minimised in order to achieve Council's projected modal split target of 40% public transport use by 2031. However, this is a modal split target that is focussed on the Journey to Work, which is the most critical period for assessment and which typically dictates infrastructure requirements. This should not unduly prohibit residents from owning a car for use associated with the other broad range of trip types, including trips during the evening and on weekends. Indeed, very limited parking (and indeed in some cases in the City of Sydney no parking) is only contemplated where there is not only excellent public transport but also access to the full range of services that one might expect in a sub-regional centre but which is not available in Macquarie Park. The issue of parking overflow onto local roads is also a legitimate concern.

It is considered that these and other reasons would have formed the basis of the DoPI's decision to adopt rates within the Herring Road UAP that are still moderated to promote public transport as a



viable option for most trip purposes, yet which are also balanced to account for these other important planning considerations. The matter of the commercial viability of developments to respond to market expectations is also a matter that needs to be given some weight.

#### **Item 2: Parking Rates in Urban Activation Precincts**

As mentioned, the proposed parking rates are comparable to those that are planned in the Herring Road UAP, the North Ryde Station UAP and the Epping Station UAP. These rates have presumably derived from an appreciation of the overall planning issues that need to be considered, including those outlined above.

In this context, it is not altogether surprising that TfNSW has previously sought lower parking rates for the North Ryde UAP. Transport for NSW's Charter is to provide a strategic focal point for transport coordination, policy, integrated transport service and infrastructure planning and delivery. In the case of the North Ryde Station Precinct, particularly with the need to increase the poor rail patronage that is presently occurring, this charter is most effectively achieved through the active suppression of parking to effectively force public transport utilisation. While this is an admirable objective, it does not necessarily achieve the more balanced planning approach supported by the DoPI, which acknowledges the needs of the market, the reasonable expectation of residents to use a car for many trip types at times of off-peak public transport services, and the need to avoid the amenity impacts associated with on-street parking impacts caused by unduly restrictive parking regimes.

#### **Item 3: Ryde DCP 2010 Parking Rates**

There is no information provided in the DCP that permits an understanding of the criteria that determines whether the minimum or maximum rates should apply. The rates as proposed are within this range and this seems appropriate given the fact that there are some areas within the Ryde LGA that enjoy improved levels of public transport accessibility and access to a broad range of services where the minimum range may be more appropriate than the subject site. These sites would more commonly be located close to railway stations within established commercial centres.

Nevertheless, it is anticipated that the views of the PAC, which are aligned with the minimum of the DCP range, would change when due consideration and weight is given to the adopted UAP parking rates, which reflect current strategic Stage Government policy.

#### **Item 4: Comparable Developments in Macquarie Park**

It is noted that the consents to all of the comparable developments (the Minister, the L&E Court or the DoPI) were all opposed by Council. It is considered that this generally reflects a persistence by Council to oppose what has ultimately been separately determined to be reasonable development. Moreover, the principle issue appears to relate more do density and in relation to that issue, the traffic network is not impacted greatly by increased densities given that residential uses are a low-order traffic generating use.

#### **Item 5: Journey to Work Data**

It is considered that Council's submission that the applicant is seeking to take advantage of only one technique (accessibility) and not the other (reduced parking) is incorrect. If this is a criticism of this application, then it is equally a criticism of the Stage Government's UAP policy. The parking rates as now proposed is still restrictive and will still suppresses demand, just not to the same extent considered justified by Council.

Again, Council has in our view overlooked the complex nature of trip making in the modern world, where public transport is simply not an option for many trip types.



## **Item 6: Reliance on On-Street Parking**

The provision of parking that is aligned with the UAP controls in our view provides a safety margin and will simply have the effect of eliminating or reducing any potential reliance on on-street parking in the locality, including in the residential precinct on the southern side of Epping Road, which is a problem that occurs in other residential precincts along Epping Road more generally. That is, parking below the levels that are now sought represents an unnecessary risk.

In contrast, potential impacts on the amenity of residents in the area appears not to be a matter that Council considers should be given any weight.

## **Traffic Generation Impacts**

The traffic assessment prepared for the purpose of the approved Concept Plan has been previously accepted by Council and this is the baseline traffic 'threshold' that underpins not just the Concept Plan, but all subsequent modifications. The existing operation of critical intersections (2011) is not especially relevant in view of the planned long term infrastructure improvements (2031) that will deal with these cumulative development impacts, as well as growth of arterial road corridors more generally.

The modelling undertaken by Council that supports these long term improvements is predicated on the achievement of a 40% public transport modal split and as outlined above, the provision of parking at the levels now proposed does not undermine this target, with public transport remaining very attractive for the journey to work.

Finally, the unit yields that Council supports and which derive from its preferred reduced FSR result in a very minor change in traffic conditions in the context of the subject site.

## **Conclusions**

We reiterate our support for the proposed parking rates on the basis that they achieve a balanced planning outcome. They do not contribute to any significant deterioration in traffic conditions during commuter peaks, do not impact unduly on achievable public transport modal splits and generally reflect current State Government policy as expressed in the current UAP controls. They do however provide flexibility for residents to make private car trips for many other trip types that are either unsuited for public transport (childcare and bulky shopping trips) or occur at times when reliance on public transport is not an attractive option (late night and evenings). That is, the proposed rates retain an element of choice for residents, rather than impose an unduly restrictive parking regime.

Please contact the undersigned should you have any queries or require any further information regarding the above.

Yours faithfully,

**traffix**

Graham Pindar  
**Director**