



Kylie Rourke - 9710 0535

File Ref: DN15/0013

1 July 2015



Department Of Planning & Environment

GPO Box 39

SYDNEY NSW 2001

By Email: Fiona.gibson@planning.nsw.gov.au

Dear Sir/Madam

Council response to section 75W request to modify the concept approval for Woollooware Bay Town Centre (MP 10_0229 MOD 4) - amendments to visitor and non-residential car parking rates and introduce rate for child care uses at 471 Captain Cook Drive, Woollooware.

Thankyou for the opportunity to make a submission on the above proposal. Council raises no objection in principle to amendments to the concept plan to accommodate future uses, provided the buildings are capable of accommodating the demand for vehicles that they create. Council has reviewed the proposal and provides the following comments.

Dual Use Parking Spaces

Council currently has a draft Development Control Plan (Sutherland Development Control Plan 2015- DCP2015), which is likely to be adopted shortly. The wording within this document which relates to "dual use spaces" is provided below:

Where a development proposal contains two or more land uses the parking requirement shall be the sum of parking required for the individual land uses. However, where the proposed land uses comprise different peak parking demands, the total requirement may be reduced such that the peak demand is met at any one time.

Council is not satisfied that the proponent has adequately demonstrated that the peak parking demands for each of the elected dual uses use would be entirely different, and that the peak demand would be met for each use at any one time. A variety of commercial uses may occupy the commercial tenancies, some of which would entail peak parking demands that are similar to that of residential visitors. Council also queries the accuracy of the peak times considered in the traffic report for residential visitors. Council has requested further and better details from the proponent on this aspect of the proposal in the recent past, and no detailed information was provided.

Childcare Centre Parking Rate

The site is unique in terms of its isolated location and the presence of residential and commercial users competing for on and off street parking spaces. Under these circumstances, the site would not benefit from any exemptions that Councils DCP2015 controls may contain. The parking requirement for childcare development is one space per four children for drop off and pick up; and one space per two staff. The proposed modification does not reflect any provision for staff parking nor is there any acknowledgement of the lack of public transport or neighbourhood street parking.

Additional parking is unable to be accommodated on the surrounding local road network and given the geographically isolated nature of the site; Council is not supportive of any amendments where there is any uncertainty that the future parking demand can be catered for.

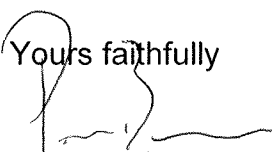
The need to vary the parking rates would indicate that an overdevelopment of the site is envisaged, where the parking generated by the uses cannot be accommodated within the area proposed to be dedicated for parking. Part of the development threshold established by the PAC is the overall quantum of parking if this has been reached, it is apparent to Council that the development potential under the Concept Plan has also been reached.

Child Care Use

The proponent provides that a future childcare centre use would 'activate key frontages of the development'. Activation of street frontages is a requirement of the Concept Plan. Councils experience with similar developments in the Sutherland Shire has been that childcare centres do not successfully activate street frontages, due to their specific needs for safety and security making them inherently introverted in their design. Council acknowledges that this would inevitably be considered as part of the future use Development Application, however the varying of the Concept Plan to accommodate Childcare Centre parking rates would be unnecessary if the intended location of the future childcare centre has flaws fatal to any future approval.

Whether the concept plan has the capacity to accommodate the specific road infrastructure required for childcare centres is a matter which warrants further study.

If you need any clarification of the above comments, please contact Council's Development Assessment Officer Kylie Rourke on 9710 0535 or email krourke@ssc.nsw.gov.au and quote the application number in the subject.

Yours faithfully


Peter Barber
Director Planning and Environment
for J W Rayner
General Manager