



14774
12 October 2015

Carolyn McNally
Secretary
Department of Planning and Environment
23-33 Bridge Street
SYDNEY NSW 2000

Attention: Fiona Gibson

Dear Ms McNally

**RESPONSE TO SUBMISSIONS
WOOLLOOWARE BAY CONCEPT PLAN (MP10_0229 MOD 4)**

This letter, prepared by JBA on behalf of the proponent, sets out the responses to the issues raised during referral period of the Modification Application to the Woollooware Bay Concept Plan (Woollooware Bay Mod 4). The Modification Application was referred to the relevant government agencies and Sutherland Shire Council (Council).

Submissions were received from Transport for New South Wales (TfNSW), Roads and Maritime Services (RMS) and Council. TfNSW and RMS did not raise any objection to the Modification Application, whilst Council raised several considerations. A detailed response to each of the matters raised in submissions is provided at **Attachment A**. Those matters which require further discussion are addressed below.

1.0 CHILDCARE USE AND PARKING RATE

Council raised concerns with the proposed childcare parking rate, suggesting the rate was inadequate to accommodate expected demand. It was also questioned whether a childcare use would be the most appropriate to be included in the lower levels of the Stage 3 development. Since receiving this feedback, the proponent has removed the childcare use from the indicative Stage 3 design, respecting Council's comments and wishing to provide a scheme which achieves the highest level of activation possible. As such, the inclusion of a specific car parking rate for a childcare use is no longer sought.

2.0 DUAL USE CAR PARKING

Council has raised a number of issues regarding the dual use sharing of car parking spaces. Council has not objected to the proposed sharing of spaces, confirming that the Draft Sutherland Shire Development Control Plan 2015 includes a provision permitting the sharing of car parking where different uses are proposed. Council's issues are addressed below.

2.1 Commercial Tenancies

The type of use which will be provided in the commercial tenancies has been questioned by Council. Council has suggested that a number of uses could be provided in the commercial tenancies with different peak periods of parking demand. This is agreed, and to confirm that the proposed uses will not conflict with the residential visitor peak parking period, it is clarified that office/business uses will be provided in the commercial tenancies.

The commercial tenancies in Stage 3 are expected to be used as office/business premises rather than retail or restaurant uses. Only a single tenancy is proposed to be used for retail purposes, being the corner tenancy at the intersection of Captain Cook Drive and the Central Boulevard. This tenancy is intended to function as a 'corner store' type retail offering, catering to the needs of the immediate community within the Residential Precinct. This approach to the commercial tenancies is consistent with the commercial tenancies provided in Stage 1 fronting Captain Cook Drive.

The Stage 3 commercial tenancies are anticipated to have operating hours between 8:00am and 6:00pm from Monday to Friday, with no activity on the weekend. These operating hours are consistent with the parameters of the assessment undertaken by McLaren Traffic Engineering for the original Traffic and Parking Report provided with the Modification Application.

The use of these tenancies as office/business premises will ensure they have peak periods of parking demand outside of the peak period for residential visitors.

2.2 Residential Peak

Council has questioned the residential visitor peak period utilised in the car parking assessment. The peak residential visitor period has been informed by a parking demand study completed by McLaren Traffic Engineering. This parking demand study used a demonstrative analysis of the changing parking demand throughout the day and week for residential visitors. Conservative estimates were placed on the assumption that 100% of residential visitors arrive at 6:00pm, though in reality this is not expected to be the case with visitors arriving at a more even spread.

The peak period has also been informed by other Development Control Plans where sharing of car spaces is permitted. The Parramatta and Rockdale Development Control Plans permit up to 40% and 50% of residential visitor spaces to be shared with retail/commercial uses between 8:00am to 6:00pm, acknowledging these hours generally reflect the operation of commercial tenancies and residential visitor demand is low.

This approach is consistent with Council's own view on residential visitor peaks, as evidenced in the below extract taken from a Council policy paper on the Draft Sutherland Shire Development Control Plan 2015:

...most visitors arrive outside of commercial peak periods when there is typically ample availability of parking in centres.
(our emphasis)

The proposed sharing arrangement of 50% of commercial spaces with residential visitor spaces is in accordance with the Draft Sutherland Shire Development Control Plan 2015, and is even more conservative than Council's expectation of sharing. Council has suggested that most visitors arrive outside of the commercial peak. The proposed sharing arrangement does not seek to provide dual use status to most commercial spaces outside their operating hours, only half of these spaces. This will ensure that if any commercial parking demand is prevalent outside of the peak it will still be capable of being accommodated.

3.0 SUMMARY

Overall, dual use parking is commonplace in town centres and mixed use development, both from an operational stand point and in the development approval process. This is reflected through the introduction of sharing arrangements in the Draft Sutherland Shire Development Control Plan 2015 and also in other Development Control Plans such as Parramatta and Rockdale. McLaren Traffic Engineering has had extensive experience with sharing arrangements of mixed use developments, providing traffic and parking expert advice on projects such as:

- 127 Princes Highway, Wolli Creek
- 341 Condamine Street, Manly Vale
- 29-47 Forest Road, Arncliffe
- 8-20 Sarsfeld Circuit, Bexley North

- 48-54 Court Road, Fairfield
- 1364 Botany Road, Botany
- Corner of Good Street/Parramatta Road, Granville

These projects, along with Woollooware Bay, utilise a sustainable approach to parking, allowing for the dual use of spaces when they would not otherwise be used. The traffic and parking assessment provided with the Modification Application has demonstrated the peak parking demands of each different use. This assessment has utilised a conservative analysis of parking demand, ensuring that the proposed sharing arrangement is workable in reality and all potential demand from each separate use is sufficiently accommodated.

The findings of this traffic and parking assessment demonstrated that the proposed sharing of 50% of commercial spaces with residential spaces would be acceptable given the varying peak periods of these uses. In total, a maximum of 15 spaces are expected to be shared, representing 13% of the overall number of residential visitor spaces available within the precinct. Given the findings of this assessment, its consistency with the approach to parking taken in other mixed use developments and the consistency of the approach with the Draft Sutherland Development Control Plan 2015, it is considered that the proposed Modification Application is acceptable.

We trust the above information is sufficient to allow a prompt assessment of the application. Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or bhoskins@jbaurban.com.au.

Yours faithfully



Brendan Hoskins
Senior Planner

- Attachment A – Detailed Response to Submissions