

Ref: 0406r05



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Attn: Chris McGillick

RE: Edmondson Park Frasers Town Centre – Proposed Modification of Car Parking Rates

Dear Chris,

I refer to the proposal seeking to modify the car parking controls (rates) applicable to residential development within the Edmondson Park Frasers Town Centre (EPFTC). Specifically, the amendments seek to reduce the relevant rates for residential apartments within the Town Centre Core only and is discussed below.

1 Proposal

The proposal seeks to amend the applicable car parking rates for Town Centre Core apartments, as outlined below.

Table 1: Summary of Previous and Proposed Town Centre Core Apartment Parking Rates

Apartment Type	Car Parking Rate (spaces per unit/dwelling)		Comments
	Previous Concept Plan ^{1&2}	Proposed	
Studio & 1 Bedroom	1.0	1.0	<i>No change</i>
2 Bedroom	1.2	1.0	
3 Bedroom	2.0	2.0	<i>No change</i>

Notes 1) Requirement originally documents as a “maximum” control in submitted MOD 4 traffic report – did not preclude a lesser car parking provision.

2) *Design Guidelines* subsequent amended to remove “maximum” from rate definition.

Having regard for the above, we now advise as follows. It should be noted that the relevant car parking rate applicable to ‘Multi-dwelling and Attached Housing’ in the previous Concept Plan was 1.0 space per unit; effectively what is now sought to be applied to the Town Centre Core apartments.

2 Justification

Apartments are subject to the SEPP 65 Apartment Design Guide (ADG) which reference the Roads and Maritime Services (RMS) *Guide to Traffic Generating Developments* (RMS Guide) with respect to minimum car parking controls that supersede any higher minimum imposed by a Council Development Control Plan.

It is emphasised that the subject site is located within close-proximity (<400 metres) to Edmondson Park Railway Station.

Edmondson Park is not a nominated Strategic Centre in *A Plan for Growing Sydney* or other strategic planning frameworks for the Greater Sydney Metropolitan Area. As such, RMS Guide rates for a 'Metropolitan Sub-Regional Centre' apply to the development, as outlined in a SEPP 65 Practice Note (included in **Attachment 1** for ease of reference) issued by the Department of Planning & Environment.

Therefore, the proposed rates comply with the minimum applicable controls, as demonstrated below.

Table 2: Comparison of Minimum and Maximum Car Parking Rates

Apartment Type	Car Parking Rate (spaces per unit/dwelling)		
	SEPP 65 (Minimum)	Proposed	Previous Concept Plan (Maximum ¹)
Studio & 1 Bedroom	0.6	1.0	1.0
2 Bedroom	0.9	1.0	1.2
3 Bedroom	1.4	2.0	2.0

Notes: 1) *Design Guidelines* subsequently amended to remove "maximum" from rate definition, despite being expressed as such in originally submitted MOD 4 Environmental Assessment traffic report.

It is evident from the above that the proposed resident car parking rates comply with the applicable controls. As such, further justification is not deemed necessary.

Notwithstanding, the following is also noteworthy:

- It is sound transport planning to encourage the use of non-car travel modes, particularly in close proximity to reliable public transport services. In this regard, not only is the site located immediately adjacent a Railway Station, the residential apartments forms part of a mixed-use precinct that includes shopping, recreation and even school services within close (walking) distance. As such, the site is a great candidate to pursue reduced car parking rates to encourage a shift away from private transport use.
- The traffic report submitted in support of the approved Concept Plan (MOD 4) included "5.1 Reduce Residential Parking Rates" as one of the potential 'travel demand management' initiatives. As such, the current proposal – to reduce car parking rates – is largely consistent with the travel demand management strategies originally intended.
- On-street car parking controls are expected to be implemented in the surrounding areas, as is common near most railway station and retail centres. These general parking controls will limit the opportunity for latent resident parking demands to adversely impact the surrounding area.

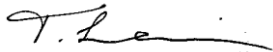
3 Summary

In conclusion, the parking rates now sought are deemed supportable for the following reasons:

- Comply with the applicable minimum requirement – being slightly above the minimum required when applying SEPP 65 Apartment Design Guide rates.
- More consistent with the other car parking controls established for the Town Centre; specifically, the changes now match those rates applicable to 'Multi-dwelling and Attached Housing' within the Town Centre.
- The reduced rates are also consistent with sound transport planning which seeks to encourage the use of non-car travel modes.

We trust the above is of assistance and please contact the undersigned should you have any queries or require further information in relation to the above.

Yours sincerely,



Principal Traffic Engineer – Ason Group

Email: tim.lewis@asongroup.com.au

Attachments 1) DPE Practice Note – Car parking requirements in SEPP 65

Attachment 1

Car parking requirements in SEPP 65

This technical note provides guidance on the application of the car parking requirements of *State Environmental Planning Policy No 65 - Design Quality of Residential Apartment Development* (SEPP 65) and the Apartment Design Guide.

Car parking in residential apartment developments

The location, form and organisation of parking is designed considering site constraints, local context, apartment types, regulatory car parking requirements and feasibility.

Parking requirements should be determined in relation to the availability, frequency and convenience of public transport, or proximity to a centre in regional areas.

In designated accessible Sydney locations and nominated centres in regional NSW, the Apartment Design Guide applies a minimum requirement that is the lesser of either the relevant rate set out in the *Guide to Traffic Generating Developments* (GTTGD) or the council car parking requirement for residential apartment development.

Car parking requirements of the Apartment Design Guide

Part 3J *Bicycle and car parking of the Apartment Design Guide* sets out a range of objectives, design criteria and design guidance for car parking, car park design and facilities for other modes of transport in apartment developments. The guide introduces parking requirements for some sites in Metropolitan Sydney and nominated regional centres.

Objective 3J-1 states:

Car parking is provided based on proximity to public transport in metropolitan Sydney and centres in regional areas

The design criterion sets out measurable requirements for how this objective can be achieved in apartment developments, as follows:

For development in the following locations:

- *On sites that are within 800m of a railway station or light rail stop in the Sydney Metropolitan Area; or*
- *On land zoned, and sites within 400m of land zoned, B3 Commercial Core, B4 Mixed Use or equivalent in a nominated regional centre*

The minimum car parking requirement for residents and visitors is set out in the Guide to Traffic Generating Developments, or the car parking requirement prescribed by the relevant council, whichever is less

The car parking needs for a development must be provided off street

The nominated regional centres to which this design criteria applies are set out in Table 3 of the Apartment Design Guide. They are: Albury, Ballina, Batemans Bay, Bathurst, Bega, Bowral, Cessnock, Charlestown, Coffs Harbour, Dapto, Dubbo, Glendale-Cardiff, Gosford, Goulburn, Grafton, Lismore, Maitland, Morisset, Newcastle, Nowra, Orange, Port Macquarie, Queanbeyan, Raymond Terrace, Shellharbour, Tamworth, Taree, Tuggerah-Wyong, Tweed Heads, Wagga Wagga, Warrawong and Wollongong.

The Guide does not set any parking requirements for other locations in Sydney or regional NSW. In these areas, car parking requirements continue to be set by the relevant council.

Applying the rates of the Guide to Traffic Generating Developments

The Apartment Design Guide references the rates contained in the GTTGD, the following explains how the GTTGD rates are to be applied in Metropolitan Sydney and nominated regional centres.

The GTTGD prescribes car parking rates for residential flat buildings based on both the scale of development (whether it contains up to 20 units, or 20 or more units), as well as on location – whether the centre is a *Metropolitan Regional Centre (CBD)* or *Metropolitan Subregional Centre*.

While the GTTGD does not define either of these terms, this classification of centres relates to an earlier publication referenced in the GTTGD, namely Part 9 of the *Metropolitan Parking Policy* (Roads and Traffic Authority, November 1988).

Centres in Metropolitan Sydney

It is appropriate to use the current metropolitan strategy for Sydney, *A Plan for Growing Sydney*, to define the scale of centres. This approach is consistent with the policy intent of both the Metropolitan Parking Policy and the GTTGD.

Therefore, those centres defined in A Plan for Growing Sydney as a CBD, Regional City Centre or Strategic Centre should apply the *Metropolitan Regional Centre (CBD)* rates of the GTTGD, while the remaining Sydney centres serviced by railway or light rail stations should be classified as a *Metropolitan Subregional Centre* for the purposes of the GTTGD.

Nominated centres in regional NSW

Outside Sydney, a number of regional centres throughout NSW have been identified in Table 3 of the Apartment Design Guide as centres to which the design criteria for car parking applies. These regional centres have been nominated based on their status under the relevant regional strategies.

In these nominated regional centres the *Metropolitan Subregional Centre* rate should be applied for the purposes of the GTTGD.

Further Information

The Guide to Traffic Generating Developments (version 2.2, dated October 2002) is available from Roads and Maritime Services. For convenience, a link to the document is also provided on the Department of Planning and Environment's website at <http://planning.nsw.gov.au/betterapartments>

For further information please contact the Department of Planning and Environment's information centre on 1300 305 695 or email sepp65@planning.nsw.gov.au