

6 June 2019

218133

Emma Butcher
Department of Planning and Environment
320 Pitt St
Sydney NSW 2001

Dear Emma,

**RE: RESPONSE TO SUBMISSIONS MP10_0118 MOD 8
EDMONDSON PARK SOUTH CONCEPT PLAN**

The Environmental Assessment Report for the above Section 75W modification to Concept Plan Approval MP10_0118 was exhibited between 17 April 2019 and 1 May 2019. In total, 38 submissions comprising 33 public and 5 agency submissions were received. In general, the submissions raised concerns that the proposed parking rate was sufficient to cater to the on-site parking requirements of future residents.

The attached response to submissions sets out the proponent's response to issues raised in the submissions, as well as additional information requested by Liverpool Council. We note that the modification has been reviewed by the RMS and Campbelltown Council who support the modification with no comments.

The response table should be read in conjunction with the attached Parking Demand Assessment, prepared by Ason Group (**Appendix A**).

The key concern raised was that the proposed reduction in parking for two-bedroom dwellings will result in an increase in demand for on-street parking. In response to these comments Ason Group (**Appendix A**) has provided an analysis using 2016 Census data of vehicle ownership in other centres that share characteristics similar to the future Frasers Town Centre (FTC), to forecast parking demand.

Key areas for comparison, which are similar to the future FTC, include being within close proximity to train stations and forming part of a larger mixed-use precinct that includes shopping and recreational uses within close distance.

Table 1 provides a comparison of numbers of motor vehicles owned by 2-bedroom dwellings within comparable suburbs, and **Table 2** includes the average number of motor vehicles owned by those dwellings.

Table 1 Number of Motor Vehicles Owned by 2 Bedroom Dwellings

Number of vehicles owned	Edmondson Park	Rhodes	Liverpool	Cabramatta	Fairfield
Nil	0%	17%	22%	26%	27%
One	100%	65%	56%	53%	54%
Two	0%	16%	19%	18%	16%
Three or more	0%	2%	3%	3%	3%

Source: Ason Group

Table 2 Number of Motor Vehicles Owned by 2 Bedroom Dwellings

	Edmondson Park	Rhodes	Liverpool	Cabramatta	Fairfield
Number of vehicles owned	1	1.04	1.04	0.99	0.97

The analysis shows that in Edmondson Park, 100% of two-bedroom households own one vehicle.

All other comparison centres have two-bedroom households with approximately 80% owning one or less motor vehicles. The average number of motor vehicles owned by two (2) bedroom dwellings is approximately 1 motor vehicle per dwelling, which is consistent with the Proposal.

According to the 2016 Census, approximately 60% households in Edmondson Park own two or more cars. However, it should be noted that approximately 96% of households in Edmondson Park have three (3) or more bedrooms, which is not comparable to the proposed two (2) bedroom dwellings within the future FTC for which a change in parking rate is sought.

The proponent and project team have considered all submissions made in relation to the public exhibition of the proposal. A considered and detailed response to all submissions has been provided within the accompanying documentation.

The proposed car parking rate of 1 space per dwelling for two (2) bedroom dwelling is considered appropriate and consistent with forecast parking demand. In summary:

- The proposed car parking rate complies with the applicable minimum requirement – being slightly more than the minimum required when applying SEPP 65 Apartment Design Guide rates and the Roads and Maritime Services Guide to Traffic Generating Development recommend minimum car park rates for Metropolitan Sub-Regional Centres, being 0.9 car parking spaces per dwelling (we note RMS raises no objection to the proposal);
- Review of Census data of areas that have similar characteristics to the future FTC, confirm that the proposed car parking rate is consistent with forecast parking demands, being 1 parking space per two (2) bedroom dwelling and therefore appropriate for adoption; and
- The proposed parking rates will also curb unnecessary or excessive car ownership by future residents; thereby satisfying the overarching objective of development near railway stations being to encourage the use of public and active transport systems.

We trust that the responses provided above will enable the Department to finalise their assessment of the modification. Given the environmental planning merits, consistency with State Policy and lack of potential environmental impacts, it is requested that the Minister approve the application.

Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or cmcgillick@ethosurban.com.

Yours sincerely,



Chris McGillick
Senior Planner