



MERITON
MAKING LUXURY APARTMENTS
AFFORDABLE

9 September 2011

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Dear Mr Woodland

SECTION 75W APPLICATION TO MAJOR PROJECT APPLICATION MP 09_0162 (CONCEPT APPROVAL) AT 14 – 18 BOONDAH ROAD, WARRIEWOOD (LOT 20, DP 1080979)

INTRODUCTION

Pursuant to Section 75W(1)(a) of the Environmental Planning and Assessment Act, 1979, a "Modification of Approval" is sought to amend the Concept Plan approval for the abovementioned site as outlined below.

PROPOSED AMENDMENT

1. Delete the internal road, linking Macpherson Street and Boondah Road and replace with two driveways.
2. Re-align the bicycle path route.
3. Make no requirement for Accessible Units.
4. Make provision for visitor car parking rate at 1 space per 10 units.
5. Make provision for 2 bedroom car parking at 1 car space per 2 bedroom.

It is proposed to vary Condition 2(2) of MP 09-0162 dated the 18 January 2011, and as updated by Schedule 1 of MP 09_0162 (Compliance with Modifications) dated the 6 June 2011.

BACKGROUND TO THE PROJECT APPROVAL

Concept Approval was granted by the Director General of the Department of Planning on the 18 January 2011 for the following:

- *"Use of the site for residential and childcare purposes and public open space;*
- *Indicative building envelopes for 16 separate buildings with heights ranging from 3 to 4 storeys;*
- *Basement level and at grade car parking;*
- *Internal and external road works;*
- *Public pedestrian and cycle pathway;*
- *Provision of a Core Riparian zones, Vegetated Buffers and Asset Protection Zones;*
- *Ecological rehabilitation works. Associated landscaping and site facilities"*

The above was approved subject to design modifications. The modifications were approved by the Director General of the Department of Planning on the 2 March 2011. The key modifications are as follows:

- Asset Protection Zone extended from 20m to 25m;
- Height of buildings capped at 3 and 3/4 with fourth storey set back;
- Total density provided at 60 units per hectare resulting in 226 apartments; and
- Basement parking for 476 cars comprising 430 resident car spaces and 46 visitor spaces.

On the 6 June 2011 the Concept Plans were updated to comply with Conditions of Consent.

Annexure 1 contains copies of the above approvals.

JUSTIFICATION FOR AMENDMENTS

Justification for the deletion of the Internal Road and re-alignment of bicycle path

Internal Access

Pittwater Council has indicated no particular need to seek ownership of the internal road as a public thoroughfare. A new public road through the site will require ongoing maintenance at cost that Council will have to fund into perpetuity. Vehicular access into the site can be adequately provided from one internal driveway off Boondah Road and another from Macpherson Street as indicated on the amended concept plans attached to **Annexure 2**.

Increased Deep Soil and Open Space

The reduction of road surface area and bicycle path will significantly reduce the amount of hard surface allocated to road and consequently provide more open space/recreational area, which is a substantial benefit to the environment and future residents. Approval on the 6 June 2011 provided 54% Deep Soil Planting. The proposed modification provides a substantial increase. Refer to **Annexure 2** for a copy of the plan.

Reduction in Stormwater Runoff

The amount of stormwater runoff will be significantly reduced which will allow more water absorption back into the ground water and ultimately the wetlands by removing the internal road. This provides a more attractive outcome from an environmental point of view, as the runoff generated will be less in quantity, and the quality, will be less polluted, as it will not be impacted by vehicles.

Re-alignment of Bicycle Path

The relocation of the bicycle path is proposed to be in a more environmentally sensitive location, as it is no longer within the naturally vegetated areas, or within the asset protection zone. The bicycle path will follow the alignment of the internal road that is to be deleted from the project.

The bicycle path will be 2.5m wide so emergency vehicles can access the site and connects with the proposed driveways linking Macpherson Street with Boondah Road.

The proposed bicycle path connecting with the site to the west has been relocated, following the preparation of detailed drawings for the relocation and rehabilitation of Fern Creek (see attached Concept Plan at **Annexure 2**).

Increased Safety for Future Residents

The reduction of the road will eliminate the possibility of vehicles using the internal road as a short cut, thereby enhancing the safety of future residents. The proposed amendment provide for a more direct access point into the residential flat buildings.

Traffic Consultants, Halcrow have reviewed this proposal and support the submission. Refer to **Annexure 3**.

Justification for the Proposed Condition re: “Accessible Units”

Insufficient Demand

This issue applies to the overall development and needs to be addressed at the Concept Stage. Pittwater Council requires 50% of the units to be accessible. This is excessively high as over the last 40 years has been only 1 request for Adaptable accommodation in Meriton developments. There is clearly a policy gap between a perceived need and the demand.

SEPP – Seniors Living

The built form provides housing stock which meets the various life cycle requirements of a community. SEPP – Seniors Living was specifically legislated to provide housing for older people and people with disabilities. People who have disabilities or are significantly older want accommodation in specialised housing facilities. This type of accommodation provides the appropriate and specialist care which meets the needs of an ageing population and or people with disabilities.

This type of residential development is the appropriate built form to meet the needs of this sector of the community. The planning system has already provided for this sector of the population. There is therefore no need to duplicate facilities.

There exists a large Seniors Living development across the road from the subject site that is professionally operated by the Anglican Retirement Village. Council’s website also lists other Seniors Living Development Applications within the Warriewood Valley that are being processed by Council. From this it is clear that older people or people with disabilities are creating more demand for Senior Living housing and not seeking accommodation in standard housing. This is because Seniors Living complexes provide housing across the full spectrum of independence through to nursing home care.

Given the close proximity of the large Seniors Living complex across the road, there should be no requirement for providing additional adaptable units on our land.

Unnecessary Cost

The cost associated to build units for people with disabilities requires the provision of ramps, wider corridors, bedrooms, kitchens, living rooms, bathrooms, toilets, and most importantly, wider car parking spaces and excessive floor to ceiling heights in the basement. Such excessive space adds considerable pressure to construction costs and leads to less affordable housing. From our experience, adaptable units and associated facilities are not used.

Stage 1 Project Approval, MP10_0177

The Stage 1 approval assessed by the Department of Planning and the Planning Assessment Commission did not require the provision of any "Adaptable Units". The proposal to remove the requirement for Adaptable Units and associated works merely creates consistency across the entire site and should therefore be applied via the concept plan approval. It is illogical that consent requires no "Adaptable Units" in Stage 1 and 50% in Stage 2.

It is accordingly recommended that there be no requirement for units to be designed for people with disabilities, as per the Concept Plan Approval MP09_0162.

Justification for the Proposed Condition re: "Visitor Car Parking Rates"

The original Project Application proposed a car parking rate of 1 visitor space per 10 units. This was subsequently increased by the Planning and Assessment Commission approval to 1 visitor space per 5 units.

In our experience having built and managed thousands of units, 1 visitor space per 10 units is more than adequate. It is noted that Councils throughout Sydney have varying rates of application which range from 1 visitor space per 4 – 8 dwellings. Similarly the RTA rates propose a sliding scale from 1 visitor car space per 5 to 7 dwellings.

It is therefore requested that the concept plan be amended that states the number of visitor car parking spaces be reduced to 1 per 10 dwellings.

Justification for the Proposed Condition re: Two Bedroom Car Parking

The proposal to have 1 car parking space for every 2 bedroom units is based on experience from the 40 years that Meriton has been building, selling and leasing apartments. Council's DCP requires 2 car spaces per dwelling, whilst the RTA guidelines are closer to 1 car spaces for every 2 bedroom unit. The Project Approval (as amended) by the Planning and Assessment Commission has close to 1 car space for every 2 bedroom unit. There should be no difference between car parking rates over the entire site and the Concept Plan should be amended to provide consistency for the number of car parking spaces for 2 bedroom units. In this regard it is proposed that the concept plan be amended to provide no less than 1 car space per 2 bedroom.

The provision of less car parking is in line with the philosophy of the Sydney Regional Development Advisory Committee (SRDAC) and RTA who are encouraging people to use public transport and alternative transport options (such as shared car pooling and cycling). By providing less car parking overall it is anticipated that this will encourage future inhabitants to be less reliant on the motor vehicle

and therefore lead to a more sustainable outcome. In this regard, **Annexure 4** provides a detailed extract of all public transport nodes from the bus stop right in front of the site that goes to Mona Vale Town Centre, Belrose Business Park, Chatswood Bus/Rail Interchange, and the Many Ferry Terminals.

PROPOSED MODIFICATIONS

The current approval for the Concept Plans as itemised in Existing Condition, Schedule 1, dated 6 June 2011 reads as per the table below.

Drawings – Project Number: 090285				
Drawing No.	Revision	Name of Plan	Drawn by	Date
A000	D-1	Open Space & Ecology	Architectus	June 2011
A001	D-1	Vehicle Access & Street Network	Architectus	June 2011
A002	D-1	Pedestrian Footpath & Access Cycleway	Architectus	June 2011
A003	D-1	Land Use	Architectus	June 2011
A005	F-1	Building Heights	Architectus	June 2011
DA07	C	Deep Planting	Meriton Apartments	27.05.11

It is proposed to amend the Concept Plans as contained in Schedule 1, as per the table below.

Drawings – Project Number: 090285				
Drawing No.	Revision	Name of Plan	Amended by	Date
A000	E	Open Space & Ecology	Troy Design	September 2011
A001	E	Vehicle Access & Street Network	Troy Design	September 2011
A002	E	Pedestrian Footpath & Access Cycleway	Troy Design	September 2011
A003	E	Land Use	Troy Design	September 2011
A005	G	Building Heights	Troy Design	September 2011
DA07	D	Deep Planting	Meriton Apartments	08.09.11

Further, the following Conditions are proposed to be inserted into Schedule of the Concept Plan Approval.

Condition 3: Accessible Units

“To provide consistency across the site no accessible units, associated parking, ramps and the like are required”.

Condition 4: Visitor Car Parking

Visitor car parking provision is to be provided in accordance with the following rate:

- a. 1 car space per 10 units, resulting in a total of 45 designated bays required.

Condition 5: Car Parking Provision for Two Bedroom Units

Two bedroom car parking provision is to be provided in accordance with the following rate:

- a. 1 space for every two bedroom unit.*

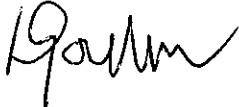
CONCLUSION

The proposed amendments provide a development which is more efficient and sustainable from both an environmental and economic perspective.

Should you have any queries please do not hesitate to contact me in the first instance.

Yours faithfully

MERITON APARTMENTS PTY LIMITED



WALTER GORDON

Manager Planning and Development