



Ref: 0994r03v03

27/08/2024

Apt Residential
Level 16, 56 Pitt Street
Sydney NSW 2000

Attention: Juey Thanyakittikul

**RE: 1—20 RAILWAY ROAD AND 50 CONSTITUTION ROAD, MEADOWBANK
MODIFICATION APPLICATION FOR AN APPROVED MIXED-USE DEVELOPMENT
PARKING STATEMENT**

Dear Juey,

PDC Consultants has been commissioned to prepare a Parking Statement (Statement) to respond to requests for information (from City of Ryde Council (Council) staff and in response to Sydney North Planning Panel (SNPP) briefings) in relation to a proposed modification application (MOD) for changes to the mixed-use development approved under LDA2020/0119 (and most recently modified under MOD2024/0095) at 1—20 Railway Road and 50 Constitution Road, Meadowbank.

The MOD will ultimately be determined by the SNPP and has been discussed extensively with Council officers.

This Statement provides an updated assessment of the proposed parking conditions which will result from the MOD and should be read in the context of accompanying planning documentation prepared by others.

We note that the MOD was accompanied by a Traffic Assessment prepared by others. We have reviewed that assessment and note that it contained errors in relation to the calculation of car parking requirements. We discuss those errors within this submission.

Additionally, through detailed discussions with Council's Traffic Engineer, we have adopted a methodology for assessment of car parking requirements and have also been able to implement important transport initiatives in relation to modal choice and sustainability which are contained within Council's planning controls.

SITE CONTEXT

The site is situated 40 metres (essentially a pedestrian crossing) east of Meadowbank Railway Station and 12 kilometres northwest of the Sydney CBD. More specifically, the site comprises an entire block which is bound on all four sides by roads, being Constitution Road to the north, Faraday Lane to the east, Underdale Lane to the south, and Railway Road to the west.

The site is comprised of several lots within MU1 Mixed Use land zoning and has a total area of around 7,700 m².

Figure 1 provides an appreciation of the site's location in a local context.

PDC Consultants

ABN: 70 615 064 670

info@pdcconsultants.com.au | www.pdcconsultants.com.au

+61 2 7900 6514 | Level 14, 100 William St, Woolloomooloo NSW 2011



Figure 1: Site Figure

PUBLIC TRANSPORT ACCESSIBILITY

The site is extremely well located to public transport infrastructure, being within 40 metres of a Meadowbank Railway Station, 400 metres of Meadowbank Wharf, and 10 metres to regular and high frequency bus services. Access to three modes of public transport within a 400 metre radius is extremely rare in the Sydney metropolitan area.

The *Transport for NSW Integrated Public Transport Service Planning Guidelines, Sydney Metropolitan Area 2013* (Public Transport Planning Guidelines) states that the walking catchment for metropolitan bus services includes all areas within a 400-metre radius of a bus stop. As can be seen from **Figure 2**, the site is excellently served by bus services, with bus stops located along the site's immediate frontage of Railway Road, as well as along Bowden Street. Further services are available within 800 metres of the site.

Accordingly, the site has excellent access to bus services, with employees, visitors and residents expected to utilise these services for journeys to and from the proposed development. **Table 1** shows the notable town centres that are accessible via the abovementioned bus services and the average service headways during the peak and off-peak periods.

Table 1: Bus Services

ROUTE NO.	ROUTE (TO / FROM)	ROUTE DESCRIPTION	AVERAGE HEADWAY
410	Macquarie Park to Hurstville	Via Ryde, Putney, Concord West, Concord, Burwood, Burwood Heights, Croydon Park, Campsie, Bexley North	Weekdays: 5 - 10 minutes Weekends: 20 minutes
458	Ryde to Burwood	Via Rhodes, Concord West	Weekdays: 30 minutes Weekends: 30 minutes on Saturday / 1 hour on Sunday
501	Parramatta to Central Pitt St	Via Rydalmere, Ermington, West Ryde, Ryde, Gladesville, Huntleys Cove, Huntleys Point, Drummoyne, Rozelle, Pyrmont	Weekdays: 10 - 15 minutes Weekends: 15 minutes
507	Meadowbank to Gladesville	Via Putney, Gladesville, Huntleys Cove, Huntleys Point, Drummoyne, Rozelle, Pyrmont	Weekdays: 10 - 15 minutes Weekends: 30 minutes
513	Carlingford to West Ryde	Via Telopea, Dundas Valley, Denistone West, West Ryde	Weekdays: 20 - 30 minutes Weekends: 1 hour
518	Macquarie University to Meadowbank Wharf	Via Denistone East, Ryde	Weekdays: 30 minutes Weekends: 30 minutes
523	West Ryde to Parramatta	Via Ermington, Rydalmere	Weekdays: 30 minutes Weekends: 1 hour
533	Sydney Olympic Park to Chatswood	Via Wentworth Point, Ryde, North Ryde, Lane Cove North	Weekdays: 30 minutes Weekends: 30 minutes
N80	Hornsby to City Town Hall	Via Thornleigh, Epping, West Ryde, Rhodes, Concord West, Haberfield, Chippendale	Weekdays: 5 Services only Weekends: 5 Services only

The Public Transport Planning Guidelines state that the walking catchment for metropolitan railway stations includes all areas within an 800-metre radius of a station. It can be seen from **Figure 2** that Meadowbank Railway Station is located 40 metres west of the site and therefore falls well within the walking catchment, with a high proportion of employees, visitors and residents at the site expected to use rail as a mode of travel to and from the site.

Meadowbank Railway Station is serviced by the T9 Northern Line, which runs between Hornsby and the Sydney CBD via Strathfield. **Table 2** shows the notable town centres that are accessible along the T9 Line and the average service headways during peak and off-peak periods.

Table 2: Rail Services

RAILWAY LINE	NOTABLE TOWN CENTRES ALONG LINE	AVERAGE HEADWAY
T9 Northern Line	Hornsby, Pennant Hills, Epping, West Ryde, Meadowbank, Concord West, Strathfield, Sydney CBD, North Sydney, Chatswood, Gordon	Weekdays: 10—15 minutes Weekends: 15 minutes

The Public Transport Planning Guidelines states that the walking catchment for metropolitan ferry wharves includes all areas within an 800-metre radius of a wharf. Meadowbank Wharf is located approximately 400 metres from the site and hence falls within the typical walking catchment area.

Meadowbank Wharf is serviced by the F3 Parramatta River route, which runs between Parramatta and Circular Quay. **Table 3** shows the notable town centres that are accessible along the F3 service and the average service headways during peak and off-peak periods.

Table 3: Ferry Services

RAILWAY LINE	NOTABLE TOWN CENTRES ALONG LINE	AVERAGE HEADWAY
F3 Parramatta River	Parramatta, Rydalmere, Sydney Olympic Park, Meadowbank, Cabarita, Chiswick, Huntleys Point, Drummoyne, Barangaroo, Circular Quay	Weekdays: 20—60 minutes Weekends: 20—30 minutes

The abundance of public transport options near the site makes it an excellent candidate for a progressive approach to car parking provision, with a significantly higher proportion of residents, employees, and visitors expected to use public transport for journeys to and from the site.

This progressive approach would be in keeping with the City of Ryde Development Control Plan 2014 (RDCP) which has stated objectives *“To minimise car dependency for commuting and recreational transport use, and to promote alternative means of transport - public transport, bicycling, and walking”* and *“To provide adequate car parking for building users and visitors, depending on building use and proximity to public transport.”*

RDCP, State Environmental Planning Policy (Affordable Rental Housing) 2009 (SEPP ARH) and State Environmental Planning Policy (Housing) 2021 (SEPP Housing) all acknowledge the principle of an ‘accessible area’ and promote the use of lower car parking provision in locations which are considered ‘acceptable’. The definition of ‘accessible’ is consistently given as being within 400 metres of regular bus services or 800 metres of a railway station and ferry wharf.

The site falls within around 1/10th the distance to bus stops considered ‘accessible’, around 1/20th the distance to a railway to be considered ‘accessible’ and one half the distance to a ferry wharf. The fact that not only does the site meet three different complementary criteria to have been considered ‘accessible’ but does so by falling well within the distance criteria, opens an opportunity to hold the site to a higher standard and constrain car parking further to minimise car dependency and promote public transport.

It would seem reasonable that the site’s proximity public transport within the ‘accessible area’ criteria be acknowledged in determining appropriate car parking rates and provision. A site 50 metres away from a railway station should not need to provide car parking at the same rate as one 800 metres away from one.



Notwithstanding these significant distinguishing features of the subject site with regard to opportunities for significant use of public transport, and potential for reduced off-street car parking, given concerns raised by the regional planning panel in preliminary briefings, the current application has been amended with the objective of meeting applicable car parking requirements, on the basis of providing an equivalency to the required rates.

Provision of a small proportion of car spaces to be used by car share vehicles is the means of achieving equivalency and in doing so, important transport aims and objectives set out in the applicable planning controls are achieved. This is discussed in detail in the following sections of this submission.



Figure 2: Active & Public Transport Services

PROPOSED DEVELOPMENT YIELD

It is understood that minor changes to the development yield have occurred and accordingly, for clarity, the proposed development yields under the subject MOD are summarised as follows:

- Retail: **3,427 m²** net leasable area (NLA).
- Boarding house: **162** rooms.
- Residential:

One-bed:	30 units.
Two-bed:	71 units.
Three-bed:	28 units.
Total:	129 units.

The car parking requirements of these yields have been assessed below.

We note that the original traffic report errantly applies the retail car parking requirement based on gross floor area (GFA), not NLA. This has resulted in a lesser requirement for the retail parking.

CAR PARKING PLANNING CONTROLS

The retail premise is assessed against the car parking rate for ‘retail premises’ outlined in Part 9.3 of RDCP, being **1.0 space per 25 m²** of NLA.

The boarding house rooms are assessed against both SEPP ARH and RDCP. The former states a ‘cannot be refused if complied with’ rate of 0.5 spaces per boarding room for developments not carried out by or on behalf of a social housing provider but permits the consent authority to consider lower rates. RDCP states a boarding house rate of **0.2 spaces per one-bed boarding rooms** within accessible areas, and Council has endorsed the use of this rate through engagement on the subject MOD.

This RDCP rate of 0.2 spaces per one-bedroom boarding room has been in effect since 2017, well before SEPP ARH was repealed and replaced with SEPP Housing, representing a proactive and forward-thinking approach by Council to provide a car parking rate more applicable to the characteristics of boarding house developments. Council officers have agreed that the RDCP rate should be preferred to the SEPP ARH rate given that it was adopted after gazettal of the SEPP and was intended to better reflect local conditions. The RDCP rate has been consistently applied to boarding house development in the LGA.

Further, SEPP Housing, which repealed SEPP ARH before the original DA for the subject site was determined in 2022, has adopted lower car parking rates for similar developments of 0.2 spaces per unit within accessible areas. We describe this lower rate as the “contemporary approach” to boarding house development in accessible areas. Further, we note that the subject site rather than being within 400 metres of a transport node, is in fact within 40m.

The finding that a car parking rate of 0.5 spaces per room is excessive is not only supported by more planning Government planning controls in SEPP Housing and RDCP, but via independent research.

Occupant Survey of Recent Boarding House Developments in Central and Southern Sydney, City Futures Research Centre of UNSW, 2019 (Boarding House Surveys 2019) found that “In terms of the match between providing off-street parking and car ownership, the current requirement that one-space-for-two-rooms be provided is in excess of that evidently needed” [emphasis added].

Trip Generation and Parking Demand of Boarding Houses Analysis Report, TTPP, 2022 (Boarding House Surveys 2022) found an average surveyed peak occupancy rate for sites within the Sydney Metropolitan Area of 0.22 car spaces per boarding room, again well below the 0.5 spaces per room defined by SEPP ARH against which the site was originally assessed.

Accordingly, there is a wealth of contemporary evidence to suggest that application of a car parking rate of 0.5 spaces per boarding room for a site as accessible as the subject site is excessive and unreasonable.

CAR PARKING REQUIREMENT

Notwithstanding all the evidence presented in the previous sections, the proposed car parking arrangements of the site have been assessed and allocation of car parking has been devised to achieve compliance on an equivalency basis, namely the inclusion of a small proportion of shared car spaces within the development.

Assessment of the proposed development yield against the relevant planning controls presented in the prior section returns the car parking requirement set out in **Table 4**.

Table 4: Car Parking Requirements

LAND USE	SIZE	NO.	PARKING RATE	REQUIREMENT
Residential	One Bedroom	30	0.6 space / unit	18
	Two Bedroom	71	0.9 space / unit	64
	Three Bedroom	28	1.4 spaces / unit	39
	Visitor	129	0.2 spaces / unit	26
Boarding House		162	0.2 spaces / room	32
Retail		3,427 m ² NLA	1 space per 25 m ²	137
TOTAL				316

Assessment of the proposed provision against the requirements of **Table 4** is made in the following sections.

CAR SHARE

The site proposes use of car share vehicles to ensure compliance to the provision of 316 equivalent car spaces.

Council promotes the use of car share, as evidenced by its Car Share Policy and accompanying Car Share Guidelines, which were endorsed by Council in 2018. The Car Share Policy has several stated objectives, including:

- **Using on-street parking spaces more efficiently:** by reducing the parking demand created by underused private vehicles.
- **Reducing traffic congestion, vehicle trips and greenhouse emissions:** by reducing vehicle kilometres travelled and shifting travel to more fuel-efficient vehicles.
- **Supporting the local economy:** by reducing the need of businesses and individuals to own a private vehicle and car space.

- **Reducing the growth in private car ownership:** By using car share vehicles, car share users defer or reduce their private car ownership.
- **Increasing social inclusion:** by enabling access to a variety of vehicles to households who could not otherwise afford them.
- **Increasing health:** as people walk and cycle more.

The proposed use of car share spaces at the site would be entirely consistent with Council's Car Share Policy and act as a means of reducing traffic congestion, pollution, and private car ownership, whilst increasing social inclusion, and supporting the local economy.

There has been significant research into the equivalent rate of car share vehicles; in other words, how many 'standard' car spaces the provision of one car share space would equate to.

The *Committee for Sydney Better Parking for Better Places* states that one car share vehicle frees up nine vehicles worth of street space, as well as stopping the CO₂ (carbon) emissions that would have been released from producing those nine vehicles. Further, the study states that for people who drive less than 8,000 kilometres per year (equivalent to 21 kilometres per day), car share is cheaper than owning a private car, and so reduces the cost of living for those households.

The Impact of Car Share Services in Australia, Phillip Boyle & Associates 2016 includes an extensive assessment and economic modelling of car share services in Australia and confirms that each car share vehicle replaces up to 10–13 private cars.

The NSW Land and Environment Court (LEC) has made several judgements acknowledging the ability for a car share space to offset the provision of standard car spaces. In *Turner Architects v City of Botany Bay Council*, the Court accepted that in the proposed residential flat building that a car share vehicle replaces up to 10–12 private cars, and that this is a reasonable alternative solution that achieves the objectives of the car parking provisions of the DCP.

Despite the above evidence that car share spaces can effectively equate to anywhere from nine to 13 private vehicles, conservatively low equivalency rates have been adopted for the subject site through liaison with Council officers, as follows:

- Boarding house: 1 car share = 8 standard spaces.
- Residential flat building: 1 car share = 5 standard spaces.

Given the Court and Council are increasingly relying upon car share as a means of achieving a more progressive and sustainable design outcome, it is evident that the same could be implemented at the subject site to good effect.

The management of car share spaces at the site is detailed within the Plan of Management, and a suitably worded condition of consent should be imposed with regard to the use and management of the car share spaces.

EFFECTIVE CAR PARKING PROVISION

Having consideration to the use of car share vehicles and proposed equivalency rate to be adopted, the effective car parking provision at the site is as set out in **Table 5**.

Table 5: Car Parking Provision

LAND USE	REQUIREMENT	PROVISION	EQUIVALENT SPACES
Residential	121	82 standard spaces	82 spaces
		8 car share spaces	40 spaces
Residential visitors	26	26 standard spaces	26 spaces
Boarding house	32	16 standard spaces	16 spaces
		2 car share spaces	16 spaces
Retail	137	137 standard spaces	137 spaces
TOTAL		271 spaces	317 spaces

Table 5 demonstrates that the provision of 10 car share spaces in total, being eight car share spaces assigned to the residential land use and two car share spaces assigned to the boarding house land use, would ensure an equivalent effective car parking provision of 317 car spaces at the site.

This exceeds the requirement for 316 car spaces determined by **Table 4** and therefore the proposed provision complies with the intent of the relevant car parking controls. On this basis, the proposal meets the applicable requirements and provides an outcome for the site and locality which encourages sustainable development.

Liaison has been held with car share provider GoGet, which has assessed the merits of the proposed development and confirmed it would support the provision of a minimum of nine publicly accessible car share spaces at the site (**Attachment 1**).

This same letter has done analysis using booking data for the months of February – July 2024 for GoGet members who live in Meadowbank and has suggested that the provision of up to nine car share spaces on the site “*will be more than sufficient supply for this [residential and boarding house] demand.*” This independent review by GoGet verifies and confirms that the proposed provision of 10 car share spaces across the residential and boarding house uses would be satisfactory to meet the demand.

The Applicant is committed to providing flexibility in the provision of car share spaces would between public and private car share vehicles, with the latter owned and operated by the building management. The management and use of both public and private car share offerings would be detailed in the Plan of Management which would in turn be enforced by a suitably worded condition of consent.

FURTHER MERIT CONSIDERATIONS

The provision of car share spaces with conservative car space equivalency assumptions ensures the site wholly complies with the intent of the planning controls and provides an effective car parking rate compliant with the requirements determined by **Table 4**. This approach has not adopted any site-specific merit-based arguments which could justifiably have been adopted, to form a comprehensive and robust assessment and car parking provision in the absence of the provision of any car share spaces.

Nevertheless, there are further such merit considerations which might reasonably be expected to reduce the demand for car parking even further. These include:

- Compatibility of the proposed land uses and their peak parking demands. RDCP allows for the potential for mixed-use parking spaces where there is a potential for alternative parking demand periods. At the subject site, there is scope that residential and retail car parking demand would occur at different times of day.
- Multi-purpose trips reducing overall car parking demand. The car parking rates for residential and retail land uses do not make deductions for mixed-use developments such as this, where a resident of the building would not need to drive to the retail component. Similarly, residential visitors might undertake a multi-purpose trip, visiting a resident of the building and the retail component in the same trip.
- Given the proximity of the site to TAFE NSW Meadowbank, a high proportion of boarding house residents would be expected to be students who typically have lower car ownership.

It is reiterated that these merit arguments are not relied upon in the determination of appropriate car parking provision at the site but remain worthwhile considerations in assessment of the site.

REDUCED TRAFFIC CONGESTION AND POLLUTION

RDCP has a stated objective *“To minimise traffic congestion and ensure adequate traffic safety and management”*. An important ancillary benefit to the proposed removal of the third basement level is the effect the reduced car parking provision will have on the number of trips generated by the development, and thus traffic congestion and pollution.

Boarding House Surveys 2022 identifies this relationship and infers that the provision of on-site car parking is likely to promote increased demand and utilisation of car parking by residents. That is, where a lower rate of car parking is provided, lower car mode and parking demand was recorded, whilst sites with higher rates of car parking provision correlated to higher car ownership and parking demand, as demonstrated in **Chart 1** and **Chart 2**.

Chart 1: Car Parking Provision versus Car Mode Share

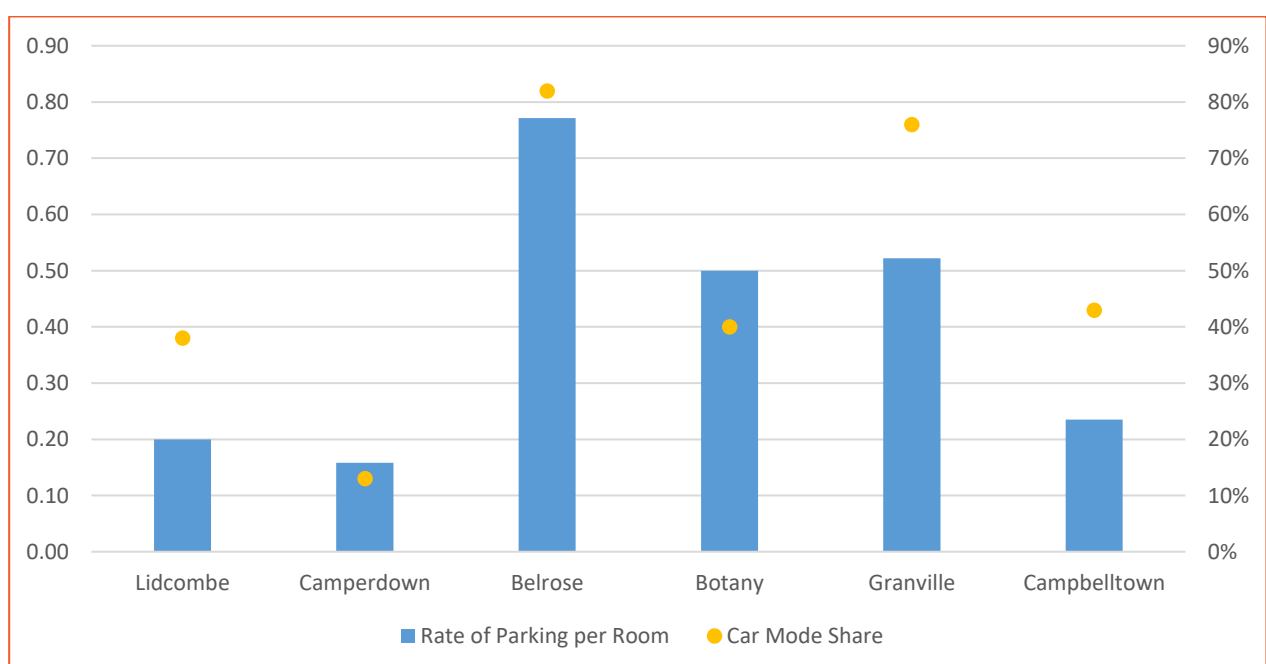
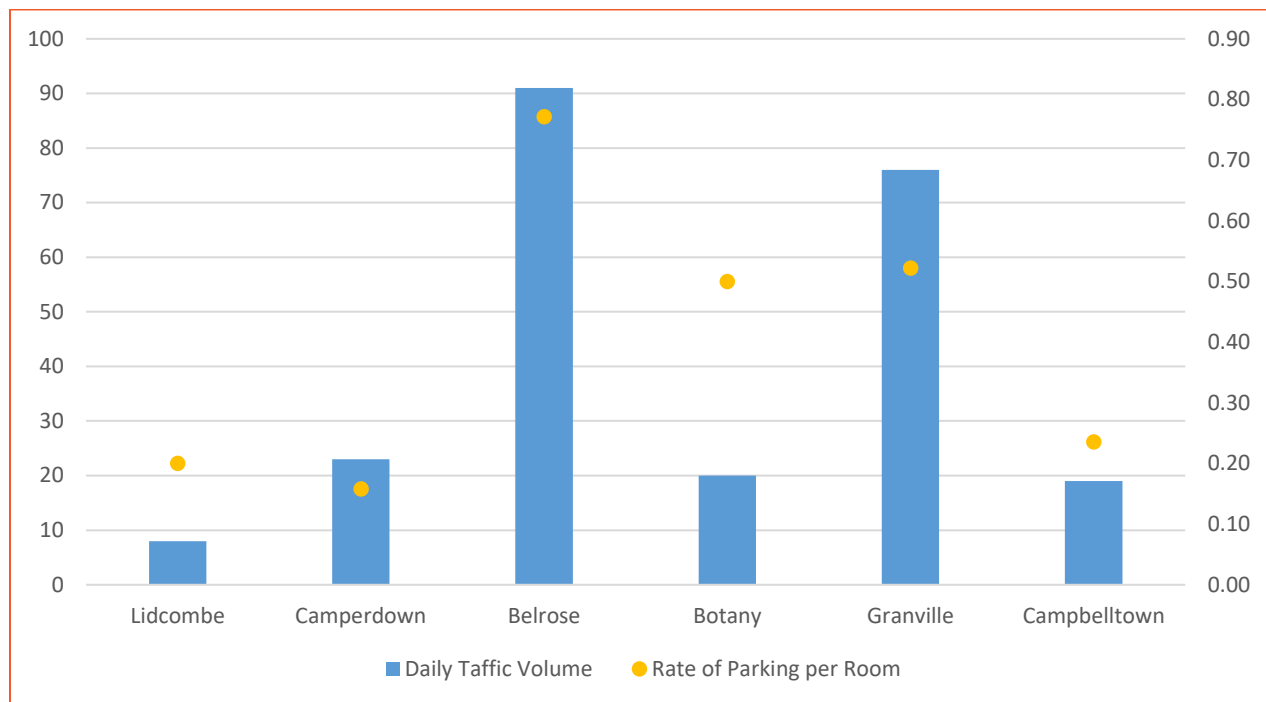


Chart 2: Daily Traffic Volume versus Car Mode Share



It is evident that the higher parking ratio also results in increased daily traffic volumes. This trend, if applied to the proposed development in the same manner, would mean that increased car parking provision would translate to increased trips on the road network and contradict Council's strategic direction with regards to mode choice, emissions and road safety.

The *Roads and Maritime Services Guide to Traffic Generating Developments Update 2013* (TDT 2013/04a) also acknowledges this relationship by identifying trip generation rates 'per car space'. For example, high density residential buildings were found to generate 0.15 vehicle trips per car space during weekday AM peak periods and 0.12 vehicle trips per hour during the PM peak period. It is therefore evident that a development providing fewer car spaces would generate fewer trips.

In any case, the MOD application reduces the number of car spaces on site, compared with the original approval, and by extension will reduce traffic generation. We note that the original approval was subject to significant VPA obligations to improve the surrounding local road network. These interventions remain an obligation of the applicant as approved despite the fact that the current MOD will reduce traffic generation.



CONCLUSION

The amended development is therefore considered supportable on traffic planning grounds. Please contact the undersigned should you have any queries or require any further information.

Yours sincerely,

A handwritten signature in black ink that reads 'Ben Midgley'.

Ben Midgley

Principal Traffic Engineer, PDC Consultants

Email: bmidgley@pdcconsultants.com.au

Attachments

- 1) *GoGet Letter of Support*



Attachment 1

27/08/24

Attention:
Ben Midgley
PDC Consultants

Carshare Service Provision Onsite 1-20 Railway Road, Meadowbank

Dear Ben Midgley,

Carshare Australia t/a GoGet would like to affirm our support for the proposed residential development at 1-20 Railway Rd, Meadowbank NSW 2114.

A carsharing program offers local residents and businesses access to a fleet of cars parked close to where they live and work for occasional use. The vehicles are parked in a dedicated location, called a pod, and are returned to that spot at the end of each trip.

Access to carsharing for residents in Meadowbank would increase transport efficiencies in the area; each carshare vehicle has the capacity to replace multiple private vehicles from our streets and carparks.

Once the development application (including the on-site carshare service) is granted approval, we confirm GoGet's intent to enter into a Licence Agreement with PDC Consultant's client, allowing the utilisation of the approved carshare spaces on the premises.

Background Information

GoGet has collated the following data to support the allocation of 9 dedicated carshare spaces onsite the proposed development at 1-20 Railway Road, Meadowbank.

Current GoGet data for the Ryde LGA:

- There are currently 45 GoGet vehicles within the LGA
- GoGet's membership base has grown to over 5000 members
- 67% of Ryde members do not own a private vehicle
- 52% of Ryde members have deferred a car purchase since joining GoGet
- 75% of these members would have parked their car in an off-street car park if they did purchase it

GoGet's 2023 Annual Member Survey reveals a trend: carshare users typically own fewer vehicles than the average Ryde resident. This indicates that having carsharing readily available can lessen the need for a surplus of private parking spaces.

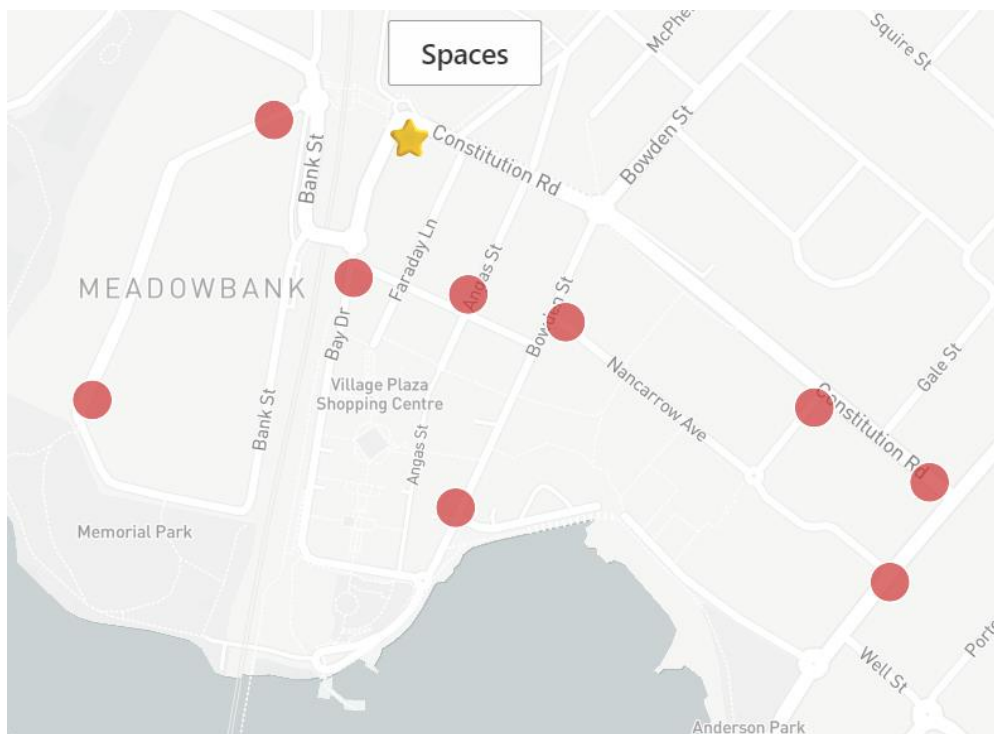
Case Study – Average Utilisation of a Meadowbank vehicle used by Meadowbank residents

Booking data for the months of February-July 2024 for GoGet members who live in Meadowbank using Meadowbank pods (For reference, GoGet's target utilisation range is between 4-6 hours per car per day (upper limit of ~180 hours per car per month). This is the ideal range both from an availability perspective and a commercial viability perspective):

- On average, a Meadowbank member uses a Meadowbank vehicle for 8.3 hours/month
- This development is proposing 13 vehicles for 180 units/boarding rooms without a parking space
- A conservative estimate of onsite uptake is that every unit/boarding room without a parking space becomes a member = 180 new members
- 180 new members = 1494 hours per month (180 members x 8.3 hours)
- 1494 / 180 hours = 8.3 cars required onsite (6 hours per car per day)

As you can see, this shows that even if every apartment or boarding room without a parking space onsite was to join the service and use a GoGet car for an average amount of time per month - **9 carshare vehicles onsite will be more than sufficient supply for this demand.**

A map of the local GoGet vehicles is shown below:



Legend:

- GoGet carshare pods shown in red
- 1-20 Railway Road, Meadowbank indicated by the yellow star

If there are any questions regarding this data, or if any further information is required, please don't hesitate to contact me.

Kind regards,

Darcy Lechte

Carshare Strategic Planner | darcy@goget.com.au | 0427 713 623

Ph: **1300 769 389** Email: admin@goget.com.au Web: goget.com.au

ABN: 39 102 892 679