

13 December 2022

General Manager
North Sydney Council
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NORTH SYDNEY NSW 2059

Electronic submission

To whom it may concern

Re: North Sydney DCP 2013 – Car Parking Rates

Urban Taskforce welcomes the opportunity to provide the following comments and recommendation regarding the Draft Amendment to *North Sydney Development Control Plan 2013 – Car Parking Rates* as it applies to new high density residential, mixed use and non-residential development in area with high public transport accessibility levels.

Opposition to further restriction on car parking

Urban Taskforce is opposed to any further restriction on car parking rates. It is a speculative exercise in social engineering which attempts to dictate behaviours based on unproven premises and projections. The facilities and features attached to any development is best dealt with through market forces as the most efficient and effective means of allocating scarce resources.

Consistent feedback from Urban Taskforce members points towards two market trends: demand for larger apartments and demand for increased car parking capacity.

Car parking spaces are amenities attached to residential mixed use and non-residential developments that are best dealt with through market forces. Should there be a reduced demand for such facilities, the market will respond. Allowing the market to decide on such matters is a position shared by other groups such as the Committee for Sydney.¹

¹ [Committee-for-Sydney-Better-Parking-for-Better-Places-August-2022.pdf,p.62](#)

While reducing vehicle use and traffic congestion are worth objectives, it is unclear that a car space, and for that matter a vehicle, directly leads to a demonstrable level of usage. Car ownership and usage is subject to a range of factors.

Analysis carried out by the industry is showing that in areas with superior public transport infrastructure show that the links between traffic generating activity (in peak periods) and car parking spaces is not linked. On the other hand, those without cars, when they require a vehicle, will rely on taxi or ride sharing services, which adds to congestion.

The areas identified in the draft Amendment are arbitrary, and there could be situations where ability to own a vehicle is dependent upon which side of the street one lives.

Car spaces are in high demand in the market, and it should be noted that they can be put to a variety of uses beyond simply accommodating a vehicle.

Events such as the COVID 19 outbreak and the increased trend of working from home also demonstrate that it is difficult, if not impossible, to accurately anticipate future trends. The regulatory framework needs to be flexible in catering for these unknowns, from consumer trends and behaviours through technology and 'black swan' events like COVID 19.

There are many factors that shape traffic congestion, and to seek to address traffic congestion by effectively barring an individual from owning a car is overkill and completely unjustifiable.

Council's language of "encouraging" alternative means of transport is misleading, as there is an effort by Council in this draft document to force people to use other means of transport, whether it suits their lifestyle or otherwise.

The proposals contained within the draft Amendment are as misplaced as the once widespread practice of regulating for minimum car spaces. They are regulatory interventions at a particular moment in time that do not allow flexibility in responses to changes in demand. Market forces continually adapt to a wide range of trends and behaviours and these forces are best placed to respond when it comes to issues like car parking spaces.

It is noted that the draft Amendment will not impact current residents who are eligible for car parking. Urban Taskforce consistently opposes policies which seek to impose higher regulatory burdens on new and future residents.

A fair way to proceed with this matter would be to impose such restrictions across the entirety of North Sydney, or as a minimum all residential, mixed used and non-residential within one kilometre of heavy rail or the metro. The idea of seeking to limit choice for prospective residents seeking to purchase property in closely defined areas of the LGA is cynical and discriminatory.

Developers should be given sufficient latitude when coming up with product offerings around residential developments. There should be minimal regulatory intervention on the efficient workings of these markets.

Finally, North Sydney Council did not meet its conservative housing targets set for it by the then GSC for the five years to 2021. Urban Taskforce notes that in the 12 months to June 2022, North Sydney Council only delivered 209 dwellings. It is required to deliver at least 3,000 new dwellings by 2026.

Urban Taskforce is concerned that the impact of this poorly thought through DCP amendment will induce more people to look elsewhere for housing where car parking is allowed - further exacerbating the serious issue Council has in achieving basic housing targets.

Notwithstanding the view of the efficacy and efficiency of the market, given the current DCP has been in place for almost a decade, Urban Taskforce does not oppose the retention of the parking rates as set out in existing 2013 DCP.

Recommendation 1: that North Sydney Council retain car parking rates in areas with high public transport accessibility levels as they currently exist in the North Sydney Development Control Plan 2013

Guide to Traffic Generating Development

It is noted that the NSW Government's own guidance document, the then RTA's *Guide to Traffic Generating Development*, is now twenty years' old and desperately needs revision.

Transport for NSW is currently updating the Guide to Traffic Generating Development.² It is important to implement policies based on the best and most recent advice. As such, the DCP amendments should as a bare minimum await the outcomes of this work by Transport for NSW.

² [Updating the Guide to Traffic Generating Development - Industry Survey | Your Say Transport for NSW](#)

Recommendation 2 - that North Sydney Council awaiting the outcomes of Transport for NSW's update on the Guide to Traffic Generating Development before contemplating any further changes to car parking rates

Victoria Cross metro station

On a related matter, whilst tremendous effort seems to be spent in trying to curb car parking rates, zoning for the land on top of and adjoining the Victoria Cross metro station is B3 Commercial Core. Whilst Build to Rent is permissible, it precludes Build to Sell residential. It is a long-standing position of Urban Taskforce that mixed used B4 zones provide greater flexibility to respond to market demand.

More effective outcomes in terms of car ownership, usage and traffic congestion could be attained by allowing residential development on top of transport infrastructure.

It is recommended that rather than further restricting car parking rates in new high density residential, mixed use and non-residential development in area with high public transport accessibility levels, that Council focus on providing more residential opportunities in development on top or adjoining soon to be delivered transport infrastructure.

Recommendation 3 - That North Sydney Council amend its LEP to rezone land on top of and adjoining the Victoria Cross Station from B3 Commercial Core to B4 Mixed Use.

Alfred St Precinct

Should the draft proceed, the Urban Taskforce recommends that the Alfred Street Precinct should be removed from the High Accessibility Area (P17).

The precinct is physically isolated from the North Sydney CBD being separated by the Warringah Freeway. Council's report on p16 states 'the location should be the determinant of different approaches...'. I note that in Council's own Alfred Street Precinct Planning Study,

'the precinct has a number of challenges which contribute to negative pedestrian amenity, ultimately inhibiting movement between North Sydney CBD, the precinct and Anderson Park...'³

³North Sydney Council, Post Exhibition Report Study, Alfred Street Precinct Planning, 2019, p, 92.

Given the premise of the High Accessibility Area study is accessibility, Council's own policy has stated that this area suffers from poor accessibility, connectivity and amenity to North Sydney CBD.

As noted in page 20 of the Report, as the Alfred St precinct is undergoing the process of its own Planning Proposal (for the last 7 years it would be premature to include any parking changes to this precinct until after a final determination is made as to the zoning and composition of the precinct. It is putting the cart in front of the horse and parking changes will affect any development or redevelopment potential and feasibility.

If proposed changes were to proceed and be implemented within the Alfred Street Precinct, it would have an adverse impact on the surrounding Whaling Street Conservation Area. Any reduction in off street carparking would push more cars onto the street noting

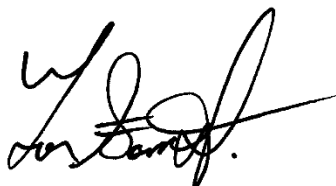
“on-street parking is currently also experienced at capacity during certain times of the week”⁴

A reduction in allowable off-street parking pending any development approval would add further parking pressures to the precinct. This is another example of why it is premature to change parking DCP controls ahead of a PP determination.

Recommendation 4: that the Alfred Street Precinct be removed from the High Accessibility Area

Should you wish to discuss this matter further, please call our Head of Policy, Planning and Research, Stephen Fenn on 9238 3969 or via email stephen@urbantaskforce.com.au.

Yours sincerely



Tom Forrest
Chief Executive Officer

⁴ North Sydney Council, Post Exhibition Report Study, Alfred Street Precinct Planning, 2019, p, 83

Recommendations

Recommendation 1: that North Sydney Council retain car parking rates in areas with high public transport accessibility levels as they currently exist in the *North Sydney Development Control Plan 2013*

Recommendation 2 - that North Sydney Council awaiting the outcomes of Transport for NSW's update on the Guide to Traffic Generating Development before contemplating any further changes to car parking rates

Recommendation 3 - That North Sydney Council amend its LEP to rezone land on top of and adjoining the Victoria Cross Station from B3 Commercial Core to B4 Mixed Use.

Recommendation 4: that the Alfred Street Precinct should be removed from the High Accessibility Area