

July 11, 2022

General Manager  
Canada Bay Council  
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*Electronic submission*

To whom it may concern

## **Re: EIE - Car Parking Rates – Rhodes Precinct**

Urban Taskforce welcomes the opportunity to provide the following comments and recommendation regarding the Explanation of Intended Effect for Car Parking Rates for the Rhodes Precinct.

While Urban Taskforce acknowledges that the rates envisaged in the EIE are higher than those permitted under the existing LEP, it is felt that they are insufficient considering the changing demand for high density living accompanied by adequate car parking.

Urban Taskforce has consistently maintained that the market is best placed to determine the appropriate level of car parking and this should not be a prescriptive matter for planning or planners (who near universally miss-read the market).

Car parking spaces are amenities attached to residential mixed use and non-residential developments that are best dealt with through market forces. Allowing the market to decide on such matters is a position that has been held by the Urban Taskforce for many years and this view is now shared by other groups such as the Committee for Sydney.<sup>1</sup>

Consistent feedback from Urban Taskforce members points towards two market trends: demand for larger apartments and demand for increased car parking capacity, in many cases notwithstanding the availability of public transport.

Since the COVID-19 pandemic, a clear trend has emerged within the market for larger apartments that can accommodate white-collar workers who wish

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<sup>1</sup> Committee for Sydney, (2022) [Committee-for-Sydney-Better-Parking-for-Better-Places-August-2022.pdf](#),

to work from home. There is also a growing number of owner-occupiers and families purchasing apartments.

Urban Taskforce opposes policies which seek to impose higher regulatory burdens on new and future residents. Maximum carparking space caps inhibit the right of residents to own a motor vehicle, or multiple motor vehicles, especially in the case of family apartments. Artificially restricting car spaces can have unintended, distortionary impacts that work against the original aims and purposes.

This includes additional cars forced to park on nearby roads, as well as broader consequences where potential purchasers buy elsewhere, away from good public transport links, hence increasing vehicular usage. The capping of car spaces also serves to effectively discriminate against blue collar trade workers who rely on their cars to get the work with tools.

Urban Taskforce notes that the linkages between car parking spaces and vehicular usage is based on out-of-date data, to which Transport for NSW is currently revising. Urban Taskforce notes the TTPP report which concludes that higher parking provision will have little impact on the traffic generated by the development, and that residents are using public transport for peak hour travel, irrespective of whether that own a car or have a car space.<sup>2</sup>

Urban Taskforce notes that the significant work (including surveys undertaken by the developer concludes that their proposed car parking rates and the delivery of larger apartments will generate less traffic than the Jacob's report *when actual data (evidence) is provided*.<sup>3</sup>

Developers should be given sufficient latitude when coming up with amenities to accompany residential development. If developers believe car parking will be in demand, they should be able to make such offerings. This is the efficiency of a market-led approach. Given the TTPP report prepared on behalf of the developer has proposed high car parking rates the EIE should seek to accommodate these figures which are based on market demand.

**Recommendation 1: that Canada Bay Council adopt parking rates as proposed by the developer and supported in the accompanying TTPP technical report which reflects market demand for and expectations from larger, family sized apartments.**

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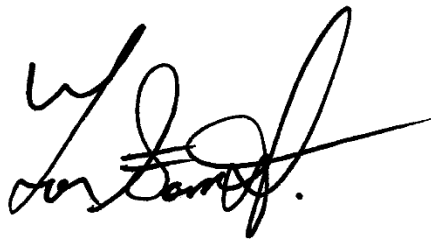
<sup>2</sup> TTPP, *High Density Residential Development in Rhodes* (2022), p.4

<sup>3</sup> TTPP (2022), p.5

**Recommendation 2: that Council adopt a policy position which removes parking controls in favour of a market-led approach.**

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](mailto:stephen@urbantaskforce.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a large, sweeping flourish extending to the right.

**Tom Forrest**  
Chief Executive Officer