



3 March 2021

Leech Harmon Architects  
80A Park Street  
Mona Vale NSW 2103

Dear Sir/Madam,

**613 - 615 Pittwater Road, Dee Why NSW 2099**

1. I refer to your request to carry out a traffic engineering assessment of the amended development proposal at the above address for the purpose of an application for a Modification of Consent under Section 4.55.
2. The original development approval was granted by the Land and Environment Court of NSW (case number 289481 of 2018). The approved development was for a boarding house with 80 rooms in total, including 5 manager rooms and 75 boarding rooms. It had two basement levels of parking with access to the lower basement via a car lift. The multi-basement level car park contained 47 car parking spaces, 66 bicycle spaces and 21 motorcycle spaces.
3. The proposed modified development is for construction of a boarding house with 80 rooms in total including 5 manager rooms and 75 boarding rooms (same as previously approved).
4. Parking requirements for the proposed development, set out in the State Environmental Planning Policy (Affordable Rental Housing) (SEPP (ARH)) 2009 - Division 3 - Boarding houses, are reproduced in the screenshot below.

**29 Standards that cannot be used to refuse consent**

(2) A consent authority must not refuse consent to development to which this Division applies on any of the following grounds—

(a) **parking**

if—

- (i) in the case of development carried out by or on behalf of a social housing provider in an accessible area—at least 0.2 parking spaces are provided for each boarding room, and
- (ii) in the case of development carried out by or on behalf of a social housing provider not in an accessible area—at least 0.4 parking spaces are provided for each boarding room, and
- (iia) in the case of development not carried out by or on behalf of a social housing provider—at least 0.5 parking spaces are provided for each boarding room, and
- (iii) in the case of any development—not more than 1 parking space is provided for each person employed in connection with the development and who is resident on site.

(4) A consent authority may consent to development to which this Division applies whether or not the development complies with the standards set out in subclause (1) or (2).

**30 Standards for boarding houses**

(1) A consent authority must not consent to development to which this Division applies unless it is satisfied of each of the following—

- (i) at least one parking space will be provided for a bicycle, and one will be provided for a motorcycle, for every 5 boarding rooms.

5. Based on the SEPP (ARH) 2009 rates, car parking requirements for the proposed development are as follows:

- The proposed development will not be carried out on behalf of a social housing provider and therefore Subclause 29 (2)(e)(iia) applies. According to this Subclause, Council must not refuse consent to a development if at least 0.5 parking spaces are provided for each boarding room.
  - 0.5 spaces per boarding room
    - 75 rooms x 0.5 = 37.5, say **38 spaces**
    - It must be noted that the site is located within an accessible area (although

TRAFFIC & PARKING STUDIES  
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CAR PARK DESIGN

INTERSECTION DESIGN

TRAFFIC ACCIDENT  
INVESTIGATION

TRAFFIC ACCIDENT  
RECONSTRUCTION

RESEARCH AND DEVELOPMENT

EXPERT WITNESSES

Director:  
Principal consultant:  
Principal consultant:

Oleg I. Sannikov MEngSc MIEAust PEng FAITPM  
Ludmilla Hawley MURP PGradCompSc BA FAITPM  
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A Division of Sannikov & Samuels  
Consulting Pty Ltd  
A.B.N. 65 092 476 143

it does not affect the car parking rates set out in SEPP (ARH) for this type of the development, it is important to note good public transport accessibility).

6. It is proposed to provide twenty-seven (27) physical car parking spaces, including 8 spaces for people with disabilities. Five (5) of general car parking spaces are proposed to be converted into car share spaces, with shared vehicles provided and with bookings managed by the boarding house management. These vehicles will be available for the residents of the proposed development only.
7. A letter from a car share operator GoGet (provided for another boarding house development in Northern Beaches LGA (attached) suggests that one car share space can comfortably replace 10 – 12 vehicles. GoGet's statement is based on their actual experience and analysis based on their presence within Northern Beaches LGA specifically.
8. However, it is proposed that only half of this rate be applied to the proposed development, with one car share space effectively replacing 5 vehicles.
9. This is consistent with a recent Land and Environment Court judgement, with regard to a proposed boarding house at No. 10 Naree Road, Frenchs Forest. Commissioner Timothy Horton has found that each car share space provided for 5 cars.

9: While I acknowledge the Respondent's argument that the basis for the figure provided by GoGet is not publicly available and so cannot be verified, I accept Mr Sannikov has arrived at the figure of five vehicles by applying a moderating factor and by reference to a local government policy, albeit in an inner city environment, and for these reasons I accept that the function of a car share vehicle would be to effectively replace five privately owned vehicles.

10. The resulting proposed car parking provision will be as follows.
  - a) The five (5) car share spaces will provide a replacement for 25 standard car spaces.
  - b) This will result in a total of
    - 27 (physical spaces) – 5 (converted to car share) + 25 (car share equivalent) = **47 car parking spaces**
  - c) It is noted that SEPP (ARH) does not require car parking provision for managers, however five (5) spaces for managers are proposed, in compliance with SEPP (ARH) Subclause 29 (2)(e)(iii).
  - d) The number of car parking spaces provided for boarding rooms is thus 47 (total) – 5 (managers) = **42**.
  - e) SEPP (ARH) **requires 38 spaces** for boarding rooms. The **proposed 42 spaces** comply with and exceed the SEPP (ARH) 2009 requirement by 4 spaces.
11. In the same Judgement quoted above, Commissioner Horton has handed down the following findings in relation to the car parking provision and car share arrangements:

- (2) Secondly, being located in an accessible area with employment hubs in close proximity, that affordable housing for key workers is intended to support. I accept that some occupants are likely to be attracted to the development for its proximity to those places of employment that would not demand of them ownership of a car.
- (3) Thirdly, in my view it is reasonable to expect potential occupants of the building will consider the availability of car parking in the context of their own needs when evaluating the suitability of this development as a place to reside. Those prospective occupants with a car, but without a guaranteed space in which to park it, may opt for accommodation elsewhere. Those without a car may be attracted by having access to a carshare vehicle for those times when one is needed.

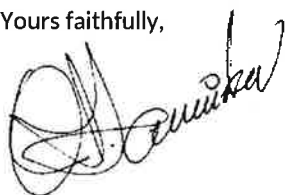
12. Based on the above conclusions, it is reasonable to suggest that the proposed car parking provision, including the car share arrangements, is likely to exceed the actual needs of the boarding house residents. Other reasons in support of this likely situation are the results of the research conducted recently by UNSW (attached). The research looked at boarding houses in Central and Southern Sydney. As is evident from the attached report, only 33% of residents own a car (this would translate into the parking demand of only 25

cars for the proposed 75 units). Even fewer residents (13% to 23%) use a car regularly – these would be residents with their own cars ( $75 \times 0.23 = 17$  to 18 cars only). The proposed 22 standard car parking spaces (non-share) will easily satisfy this level of demand. Those remaining residents who would need to travel by car, will do so occasionally and 5 car share spaces (25 equivalent spaces) will be more than sufficient for their needs.

13. It is prudent to note that the existing public transport provision near the site is excellent, further reducing the need for residents of the proposed boarding house to own private motor vehicles.
  - a) The nearest bus stop is located approximately 100 m walking distance from the site.
  - b) It provides access to bus routes 178, 179, 180 and 199, which has frequent services.
14. Current bicycle and motorcycle parking requirements for the proposed development, set out in the State Environmental Planning Policy (Affordable Rental Housing) (SEPP (ARH)) 2009 – Division 3 – Boarding houses, are reproduced in the screenshot on page 1.
15. Based on the SEPP (ARH) 2009 rates, bicycle and motorcycle parking requirements for the proposed development is as follows:
  - One (1) bicycle and 1 motorcycle space per 5 boarding rooms
    - $75 \text{ rooms} / 5 = 15 \text{ bicycle spaces and } 15 \text{ motorcycle spaces}$
16. Twenty (20) bicycle spaces and 16 motorcycle spaces are proposed. This provision complies with and exceeds the SEPP (ARH) 2009 requirements.
17. Based on the information presented, I conclude that the proposed modification under S4.55 is supportable on parking grounds.

Please do not hesitate to contact the undersigned should you require further information.

Yours faithfully,



Oleg I. Sannikov  
 Director  
 MEngSc (Traffic Engineering)  
 MIEAust PEng  
 FAITPM

Attachments:

- GoGet letter
- Excerpts from the UNSW report
- Vehicle turning diagrams for the amended plans

09/07/2018

Attention: **Michael Williamson**

Managing Director &amp; Development Manager

Williamson Building Corp

### CarSharing for 10 Naree Road, Frenchs Forest

CarShare Australia would like to confirm our support for GoGet carshare on site at 10 Naree Road, Frenchs Forest with 1 or 2 GoGet vehicles proposed onsite. A car sharing 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. Car sharing services operate to fill a mobility 'gap' that exists between private car ownership, which is inefficient, expensive and unsustainable and public transport, walking and cycling, which can generally suit most local transport needs. A car sharing service in the development would increase transport efficiencies in the area and encourage public transport usage by residents and the surrounding community.

GoGet has established its presence in Northern Beaches for over 12 years and currently operates over 75 cars serving over 3,000 members in the LGA. Frenchs Forrest is an expansion area for our service and we predict a large increase in demand for the service with the opening of the new Hospital. We have GoGet on site at other North Shore Health Hospitals and plan to expand to this one.

**For the Northern Beaches LGA we estimate that 1 carshare vehicle can comfortably replace 10-12 vehicles.** This is based on available statistical data<sup>1</sup> of Northern Beaches LGA, our membership data and our Annual membership survey data. This number is supported by the NSW land and environment court rulings<sup>2 & 3</sup>.

Carshare pods located within close proximity of key transport corridors like the B line experience the strongest uptake of carshare uses because members enjoy the added convenience of being able to access a carshare to undertake their short-distance errands once alighted from main transport nodes. This is further encouraged by the assurance of a reserved car space (our pods) to return the carshare vehicle before members continue their journeys via the main transport lines again.

With the committing to subsidising membership for tenants/residents of this development scheme, we expect even higher adoption rates of the service, thus allowing residents to no longer need to own private cars and relieves pressure to the limited on-street parking.

<sup>1</sup> 2016 Bureau of Statistics HTS Data

<sup>2</sup> 2016 Turner Architects vs Botany Bay Council

<sup>3</sup> 2013 Sheer Property Group vs Randwick City Council



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Overall, a car sharing program provides a reliable, convenient and affordable alternative to private car ownership. It has the following advantages:

1. Allows people to live car-free, and businesses to reduce underutilized vehicles;
2. Promotes alternative transport options such as public transport, cycling or walking;
3. Decreases car usage which improves local air quality and promotes local businesses;
4. Removes private cars from local streets and car parks freeing up parking.

Should you require further information please don't hesitate to contact me directly.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Chris Vanneste'.

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Head of Locations and Partnerships  
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Built Environment

# City Futures Research Centre

## Occupant Survey of Recent Boarding House Developments in Central and Southern Sydney

A research report commissioned by Southern Sydney Regional Organisation of Councils (SSROC)

Dr Laurence Troy, Dr Ryan van den Nouwelant & Prof Bill Randolph

June 2019



## Executive Summary

Since 2009, boarding house developments have been permitted, even incentivised, in some locations under Division 3 of the Affordable Rental Housing SEPP. Their purpose, as outlined in Department of Planning material accompanying the SEPP's introduction, is to provide accommodation that is accessible to tenants who could find it difficult to obtain mainstream rental accommodation, reduce social housing waitlists and provide a market-based form of transitional housing. However, there has been little assessment of the extent to which dwellings produced under the provisions of the SEPP align with these intentions.

This report summarises the findings of a survey of occupants of recent boarding house developments in the Southern Sydney Regional Organisation of Councils (SSROC) region. The survey was hand delivered to all operational boarding houses approved under the SEPP, excluding purpose-built student accommodation (PBSA) across the SSROC region. The purpose of the survey was to address five research questions:

1. Have boarding house approvals resulted in the construction of new boarding houses?

Overall, of the estimated 6,000 boarding rooms approved (excluding PBSA), around half were deemed operational. More pertinently, and discussed below, very few were akin to 'traditional' boarding houses.

Previous research by City Futures (Troy *et al* 2018) identified 334 approvals for new or expanded boarding houses. Of this, some 17 were identified as PBSA, (based on landowner, applicant or operator) and a further 29 approvals relating to a site with multiple approvals. Of the 288 other boarding houses, only 237 were deemed to be operational, based on bond lodgement, registration under the Boarding House Act and inspection aerial photography via Nearmap for construction works. Hand delivery of survey invitations further reduced the evident number of operating boarding houses to 195, to which invitations were delivered.

2. What is the profile of occupants of recent boarding house developments?

Overall, occupants of boarding houses were much closer in profile to typical renters than to traditional boarding house occupants or social housing waitlists.

While diverse, they were overwhelmingly employed or in tertiary studies (91%), with two-thirds already holding a tertiary qualification. They were mostly (65%) overseas born (though not all recent arrivals), mostly (63%) under 35 years old, and evenly split along gender lines (54% female). Only one third of occupants owned a car and even fewer (less than 23%) used a car regularly. And boarding rooms were typically occupied exclusively by a single tenant (74%) or with a partner (19%).

3. What are the housing needs of those occupants, and the suitability of boarding houses in meeting them?

Much like the tenant profile, the boarding room profile was much closer to private rental studios than traditional boarding houses typified by communal living arrangements.

The vast majority (86%) were rented out under formal tenancy agreements (cf. lodgings). A similar proportion were self-contained, with private bathrooms and kitchens, and in some cases partially furnished (less than 50%, varied by furnishing). Around half had access to common areas and onsite management (41%). Very few had access to a car space (16%). Boarding houses were well located and, importantly, location and neighbourhood factors were more important than building or apartment factors in resident consideration and satisfaction.

4. Are boarding rooms a satisfactory long-term accommodation option?

These amenities would be a higher standard than that available to occupants of older, more traditional, boarding houses. However, very few occupants evidently come from that clientele.

Compared with traditional apartment rentals, the main benefits to offset the much smaller private space are evidently the location, modern clean buildings, furnishings, common areas (like laundry) and onsite management.



Length of tenure, and so occupant turnover, was also relatively stable (comparable to private rental), with half the occupants anticipating staying for two years or more.

Perhaps most importantly, though, new boarding house developments do not offer a significantly more affordable housing option, compared with other options on the private rental market. Yet most residents (64%) were on low incomes (<\$800 per week), nearly all (90%) of whom were paying more than a third of income on rent, and so classified as being in rental stress. Overall, at least two thirds (and potentially as high as four fifths) of occupants were in rental stress. This suggests that this form of accommodation is not suitable for most current occupants over the longer term. This form of accommodation is also not suitable for those identified as in need of affordable housing – such as those on social housing waitlists, those excluded from mainstream rental markets or those seeking transitional housing.

5. What are the strategic and regulatory implications for boarding houses and affordable housing?

The main implications of the survey are two-fold, both stemming from the fact that the accommodation being delivered under the SEPP are not boarding houses as traditionally understood.

First, it means that much more consideration in the context of residential flat building development and SEPP 65, needs to be made about how these new developments of self-contained 'micro-apartments' sit, at a broader neighbourhood scale, with other apartment developments in terms of occupant amenity and housing diversity.

Second, it means the provision of affordable housing for marginal households, as originally intended by the introduction of the SEPP, has not been achieved. This raises important questions about the absence of an adequate response to the shortage of affordable housing by the NSW Government, about the failure to evaluate the extent to which the SEPP is meeting its stated policy objectives, and about the expectation that planning incentives will induce the market to provide affordable housing options for marginal households.

One particular manifestation of this disjuncture between expectation of boarding houses and what is being delivered under the SEPP is worth highlighting. This is the regulation of ongoing tenant and building management. Lodgings – as distinct from formal tenancies – are intended to provide an option for marginal tenants who otherwise have difficulty securing housing. The survey suggests that these developments are not operating as lodgings. At the very least, this raises a question of compliance with development consent as a boarding house, which is defined in the standard *Local Environmental Plan* as "wholly or partly let in lodgings". More broadly, self-contained apartment complexes do not meet the definition of a boarding house under *Boarding House Act 2012* (NSW), so are not subject to operating regulations and inspection regimes to maintain fire safety, shared accommodation standards and at-risk occupant referrals to FACS.



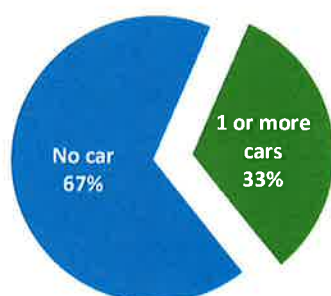
## Exhibit Traffic-D p. 22

as reported in the 2016 census.<sup>1</sup> Given the sample size, it is not possible to extract reliable statistics for a sub-sample. However, the survey responses did indicate that the proportion of tenants that did not own a car was higher closer to the city and lower (but still a majority of respondents) further from the city.

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. Prior to the 2018 amendments, one-space-for-five-rooms was required for boarding rooms within 400m of a public transport node, and two-spaces-for-five-rooms was required in other areas. A qualitative interpretation of the distribution of survey invitations and responses suggest that this is close to actual ownership rates, and close to the difference in ownership rates across the study area. Again, though, it should be noted that the exact location of each respondent was not recorded, so the ownership rates within/beyond the public transport nodes cannot be confirmed directly.

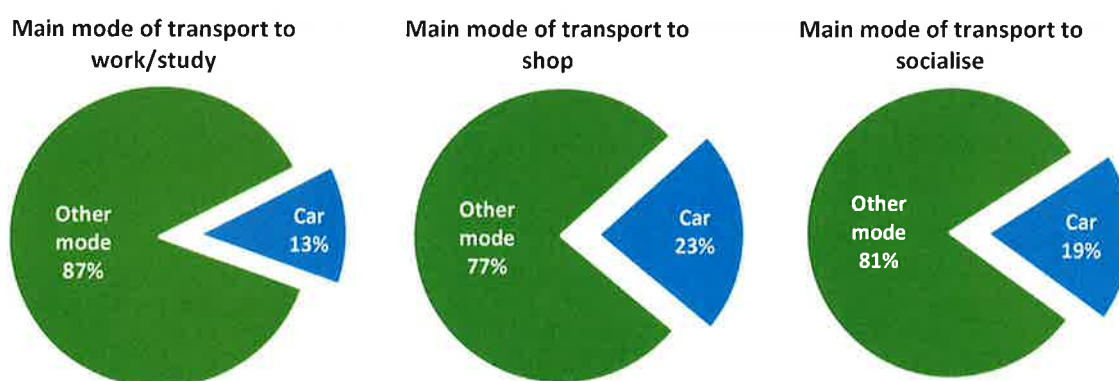
**Figure 2 Car ownership**

How many cars are owned by your household



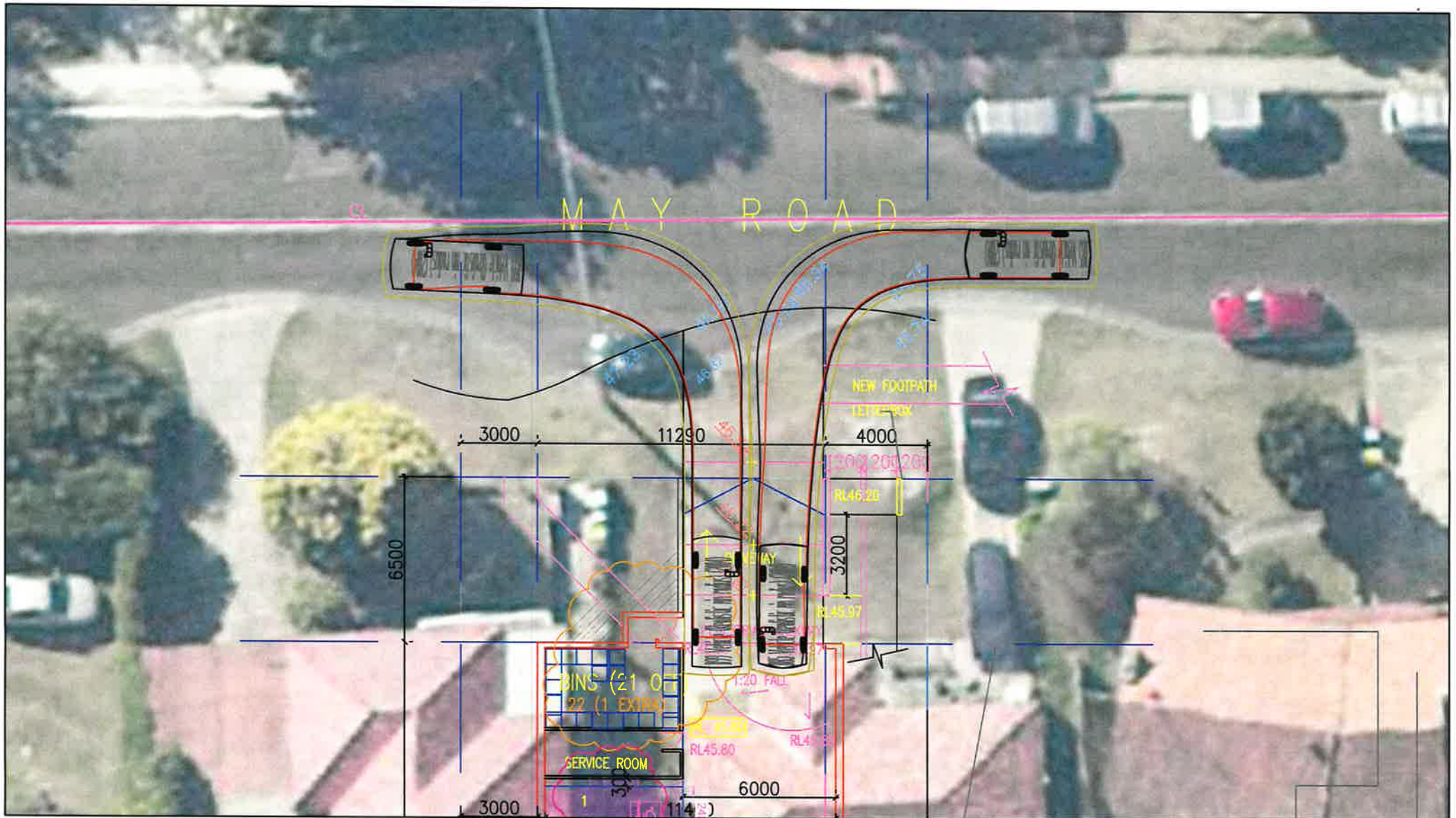
Beyond the planning objective of meeting demand for private car ownership close to public transport nodes, is one of managing demand in areas with high levels of public transport provision. In this regard, a more important finding is that the proportion of respondents that identified something other than a private car as their primary means for getting to work/study, for getting to the shops, and for leisure activities exceeded the two-thirds figure of those without a car (see Figure 3). This translates to between, roughly, one third (for leisure activities) and two thirds (for work/study commutes) of car owners not primarily using their cars for these activities.

**Figure 3 Main modes of travel by purpose**

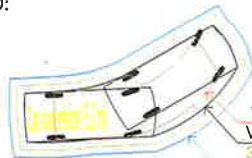


<sup>1</sup> The count of Greater Sydney GCCSA households renting (excluding those renting from state housing authority or community sector organisation) an apartment (all categories described as a 'flat') with no bedrooms (i.e. including bed-sitters) was 6,762. Of those households, the count owning no motor vehicles was 4,511.





LEGEND:



WHEEL PATH  
VEHICLE BODY  
300 MM CLEARANCE  
600 MM CLEARANCE



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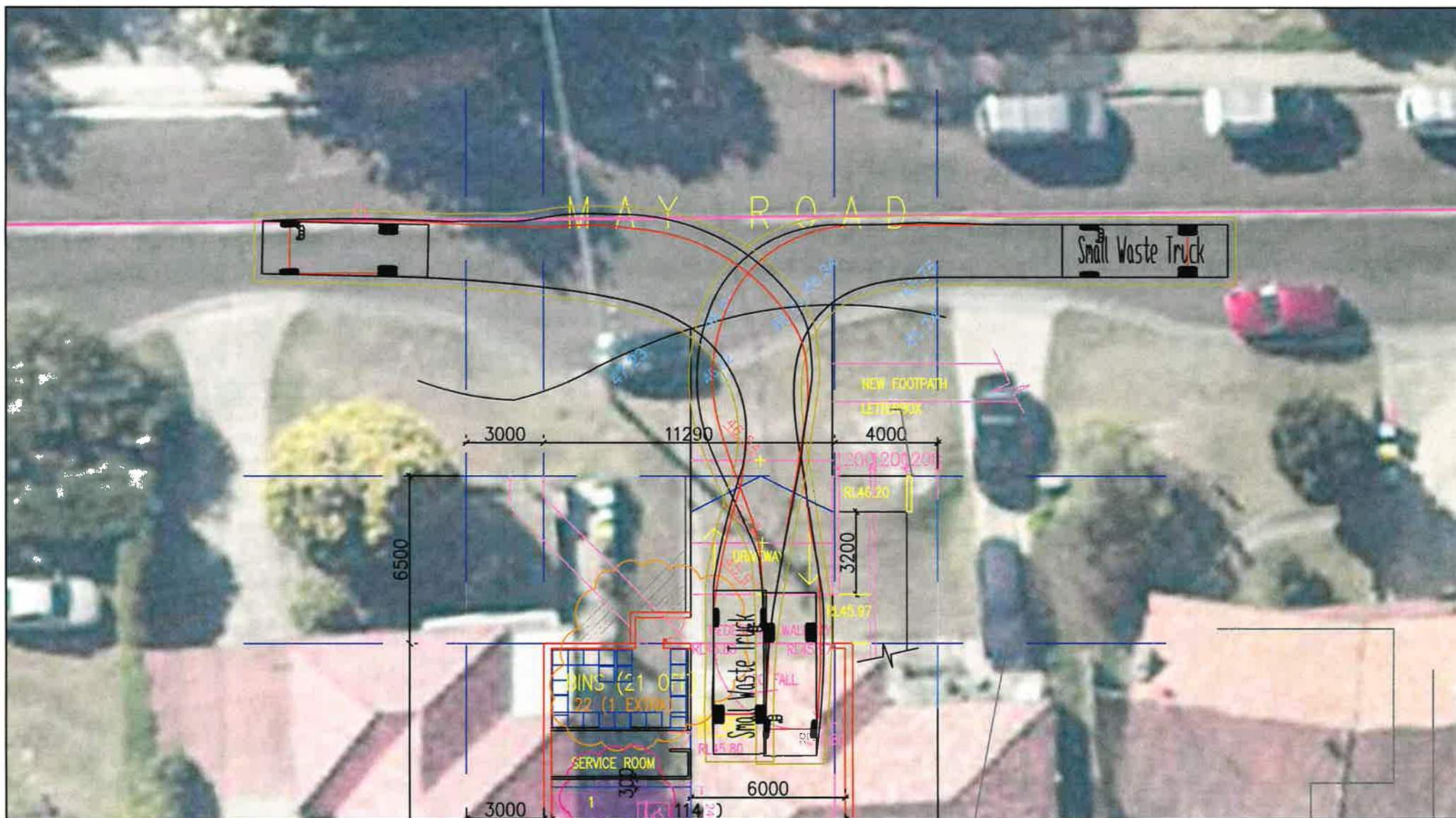
Client:  
Northern Contracting Group

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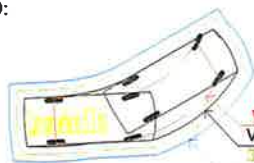
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Proposed car park layout  
Design checks as per AS/NZS 2890 series





LEGEND:



WHEEL PATH  
VEHICLE BODY  
300 MM CLEARANCE  
600 MM CLEARANCE



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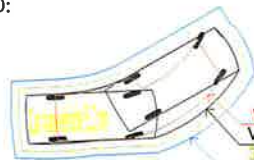
Proposed car park layout  
Design checks as per AS/NZS 2890 series

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**1**



WHEEL PATH  
VEHICLE BODY  
300 MM CLEARANCE  
600 MM CLEARANCE



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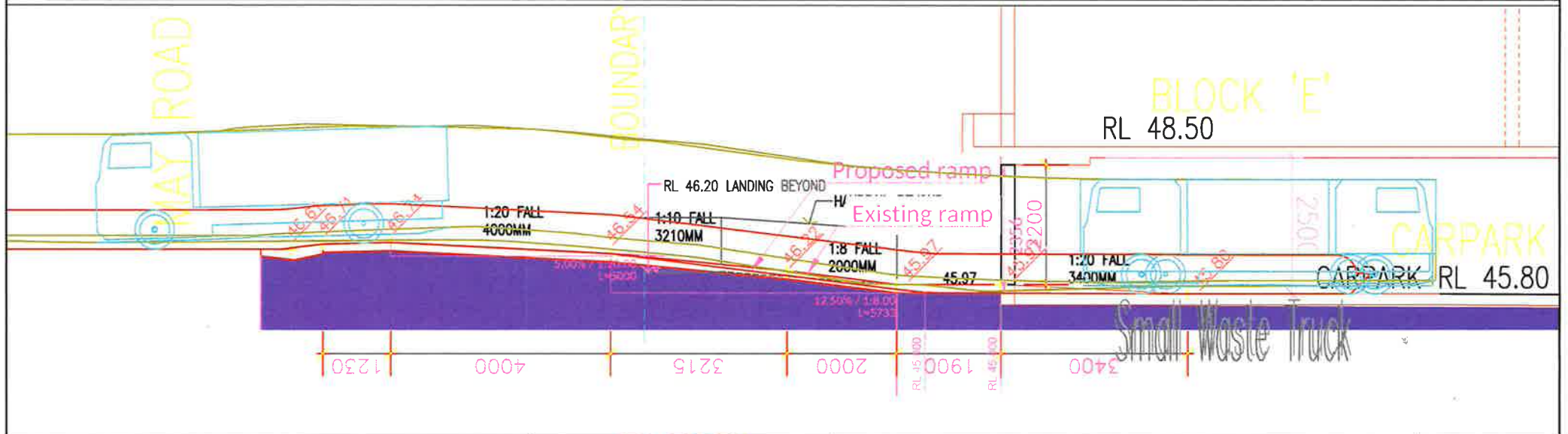
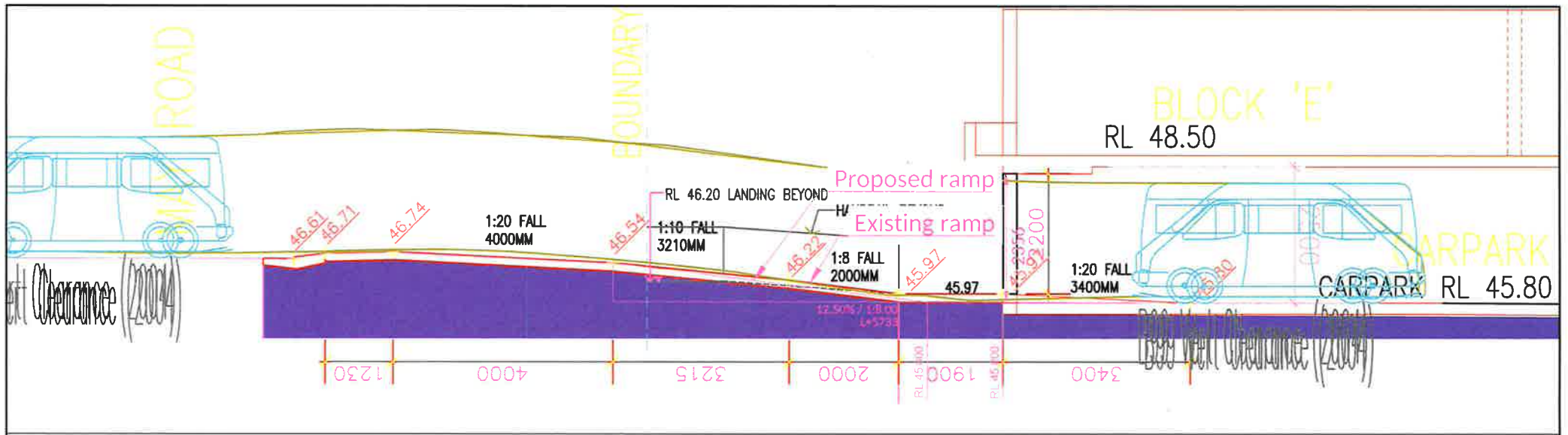
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Proposed car park layout  
Design checks as per AS/NZS 2890 series

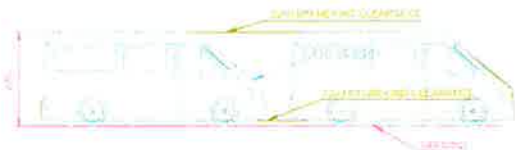
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LEGEND:



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Proposed car park layout  
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