

# **Traffic Engineer Referral Response**

Application Number:	DA2024/1303
Proposed Development:	Two (2) staged redevelopment of the Forestville RSL club involving the construction of a registered club and fifty two (52) independent living units and ancillary uses
Date:	18/06/2025
Responsible Officer	
Land to be developed (Address):	Lot 31 DP 366454, 20 Melwood Avenue FORESTVILLE NSW 2087 Lot 11 DP 626916, 11 / 0 Melwood Avenue FORESTVILLE NSW 2087 Lot 2589 DP 752038, 22 Melwood Avenue FORESTVILLE NSW 2087

#### Officer comments

# Referral comments 18/6/25 Not supported.

The amended proposal is for demolition works and construction of a registered club and Seniors Housing development containing a total of 52 Independent Living Units (ILUs), to be constructed in two stages.

#### Stage 1

Construction of a three-level basement carpark

Construction of a registered club with a 3,539m2 GFA (decrease of 210m2 of GFA) Construction of a new 16 Independent Living Units (ILUs) above the club building Car parking to accommodate:

- 29 ILU Resident spaces;
- 9 ILU visitor spaces (including 3 on ground floor); and
- 125 club spaces.

#### Stage 2

Demolition of existing registered club on site.

Construction of 36 Independent Living Units (ILUs) and ancillary uses.

Construction of a remainder of a two-level basement car park.

Car parking to accommodate:

- 45 ILU Resident spaces;
- 3 ILU visitor spaces; and
- 78 club spaces.

The development proposes a total of 289 car parking spaces comprising 74 resident spaces with 12 visitor spaces, and 203 club parking spaces. An amended Traffic and Impact Assessment (TIA) has been prepared by Traffix dated May 2025 Reference: 24.186r01v06 along with updated Architectural Plans.

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#### **Access and Porte Cochere**

The changes to provide a central access driveway for the Club and senior basement car park levels is supported. The separate access for trucks and waste collection servicing the Basement 1 Loading Dock is also supported. However, the southern access driveway would need to be widened considerably to enable a MRV/HGVs to turn left out of the driveway without crossing onto the opposite side of the road into oncoming traffic. It is also noted that the access driveway to the loading dock and servicing areas will also be used by residents and club patrons to access the Stage 1 car parking area until the completion of Stage 2. It is therefore recommended that a "No Left Turn Vehicles Over 6m" restriction be imposed to ban the left turn movement for longer vehicles exiting the driveway.

The Club entry and Porte Cochere access is via a separate entry driveway at the southern end of the site with exit driveway in a clockwise direction. The at-grade car park makes provisions for two courier/delivery parking spaces and one ambulance bay. The proximity of the access driveway to the basement loading dock and exit driveway for the Porte Cochere creates a wide crossing point along the footpath for pedestrians. The separation between the driveways should be increased to a minimum 3m to provide sufficient refuge for pedestrians.

#### **Traffic Generation**

The TIA indicates that the existing Forestville RSL Club with 3,749m2 GFA has a peak traffic generation of 175 vehicle trips per hour during the evening peak period. The construction of the new Club has a of 3,539m2 which would does not generate additional traffic based on the GFA. The net impacts of the development would therefore be due to the increase in future traffic generation from the proposed seniors housing component, which has been assessed in accordance with Roads and Maritime Services (RMS) 'Guide to Traffic Generating Developments 2002' and the updated traffic generation rates in the Technical Direction (TDT 2013/04a) document. The proposed 52 ILUs generates 5 vehicle trips during the am peak hours and 11 vehicle trips during the pm peak. The SIDRA analysis shows that the affected intersections in the area currently operate at a Level of Service (LoS) A (good) or B (good with acceptable delays and spare capacity) and will remain at the same LoS. And therefore does not result in significant impacts to the existing road network.

#### Club parking

The TIA states that the development requires 113 Club parking spaces based on the average demand from similar registered clubs, 1 space per 31 31.57m2 GFA (3.17 spaces per 100m2 GFA). The development however proposes a total of 203 spaces for Club patrons and staff, which provides a surplus of 90 spaces. The TIA indicates that the additional car parking is required to cater for future car parking demand as well as during peak times throughout the year; including Saturdays when the Forest Rugby Club has home games, special events with use of the function rooms, and public holidays including ANZAC Day. Additional parking is considered reasonable as it reduces demand on on-street parking and parking areas provided for other facilities. Any surplus in Club parking spaces however would only be supported subject to measures to include more sustainable modes of transport by providing the specified electric vehicle charging, motorcycle parking, and bicycle parking with end of trip facilities.

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## **Resident Parking**

The proposed Seniors Housing portion of the development contains a total of 52 Independent Living Units (ILUs), comprising (27 x 2-bedroom and 25 x 3-bedroom units), which requires 65 resident spaces under the SEPP Housing 2021, and 70 spaces under Council's WDCP 2011. A total of 11 resident visitor spaces is also required, when applying the DCP rate of 1 visitor space per 5 units or part of dwellings.

The Traffic and Impact Assessment (TIA) states that the development proposes a total of 86 car park spaces, comprising 74 spaces for residents and 12 spaces for visitors. The proposal exceeds the minimum SEPP and WDCP car parking requirements in terms of number of spaces. with the majority of the 3-bedroom units provided with two spaces. However, the resident and visitor parking spaces do not meet the design requirements of the SEPP.

Schedule 4, Part 1 Clause 4 (2)(c) of the SEPP refers to the Car Parking standards for independent living units (ILUs) for a group of 8 or more parking spaces -

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- (i) at least 15% of the parking spaces must comply with AS/NZS 2890.6.
- (ii) at least 50% of the parking spaces must -
  - (A) comply with AS/NZS 2890.6,
- (B) be at least 3.2m wide and have a level surface with a maximum gradient of 1:40 in any direction.

The Architectural Plans show that all resident parking spaces are 3.2m wide and 5.4 long. Although this complies with the second part of the Clause, the first part is not met. If the development proposes 74 resident parking spaces, then 11 resident spaces must be designed to comply with AS/NZS 2890.6.

Furthermore, the SEPP requires that at least 5% of any visitor parking spaces must comply with AS/NZS 2890.6. If the development proposes 12 visitor spaces, then 1 space must be designed to comply with AS/NZS 2890.6.

There are discrepancies between the TIA, Accessibility Design Review and the amended Architectural Plans. The Site Analysis – Car Parking plan indicates that a total of 12 visitor spaces are to be provided. Stage 1 is to include 3 Ground Floor spaces and 6 Basement 1 spaces, while Stage 2 will provide 3 Basement 1 spaces. The Architectural Plans however do not show any Visitor parking spaces in Stage 2. The Basement 1 plan currently shows 6 Visitor accessible parking spaces (with Shared Area) and a single space (2.4m wide x 5.4m long) adjacent to the ramp which leads to the Club parking on Basement 2. This is still 2 spaces short of the proposed 9 spaces in the Basement 1 seniors car park. It is expected that one of these spaces can only be installed in Stage 2 after construction of the central access driveway, as the area occupied by the parking space will act as part of the circulation roadway to provide access to the Basement 1 car park during Stage 1. Furthermore, the Ground Floor plan shows two delivery/courier spaces and ambulance parking in the at-grade car park as part of the proposed resident visitor parking spaces. These spaces should be considered as part of Club parking requirements rather than reducing the visitor parking for the seniors development. The required 11 visitor spaces for residents should therefore be provided wholly within the Basement 1 car park.

The location of the visitor and accessible parking spaces is important as the development is constructed in two stages with ILU's provided in each of the four buildings. The visitor parking should be provided in close proximity of each other so that visitors can easily locate the designated parking

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areas. The resident visitor spaces should therefore be situated at the western end of the Basement 1 car park, which provides convenient access to the lifts for the Club Building and Building 3 once the central access driveway is completed in Stage 2. All accessible spaces (AS/NZS 2890.6) should also be distributed throughout the car park close to the lifts of each of the buildings to improve access for residents.

The following locations are recommended to provide for the seniors accessible parking allocation and visitor parking.

## Stage 1 – Visitor Parking

- Resident No.10 converted to Resident Accessible, by providing adjacent Shared Area for the Club Building.
- Resident No.1-3 converted to provide four Visitor parking (2.5m wide) for Club Building, includes adjustments to parking module.
- Resident No.4 and 5 reallocated to Visitor parking for Club Building.
- Resident No.6 and 7 reallocated to Visitor parking (2.5m wide) for Club Building, includes adjustments to parking module.

## Stage 1 - Accessible Parking

- Resident No.8 and 9 converted to provide two Resident Accessible spaces (with Shared Area) for the Club Building, includes widening and adjustments to parking module.
- Visitor Accessible No.5 and 6 reallocated to Resident Accessible (with Shared Area) for the Club Building

#### Stage 2 – Visitor Parking

• Resident No.14 and 15 converted to provide three Visitor parking (2.5m wide), includes widening to parking module.

## Stage 2 - Accessible Parking

- Resident No.12 and 13 converted to provide two Resident Accessible (with Shared Area) for Building
- Resident No.24, 25, 26 and 27 converted to provide four Resident Accessible (with Shared Area) for Building 1, includes widening and adjustments to parking module.
- Resident No.32 and 33 converted to provide two Resident Accessible (with Shared Area) for Building 2, includes widening (reduce width of Gym area by 0.3m).creation of one additional Resident parking space and adjustments to parking module.
- Resident No.32 and 33 converted to provide two Resident Accessible (with Shared Area) for Building 2. Includes widening and adjustments to parking module by reducing width of Gym area by 0.3m, to create two additional Resident parking spaces at the northern end.

The above parking allocation would comply with the SEPP Housing 2011 for seniors ILUs, by providing a total of 72 resident parking spaces; comprising 60 spaces (3.2m wide x 5.4m long) and 12 accessible parking spaces (AS/NZS 2890.6), and 11 visitor parking spaces including one accessible space (AS/NZS 2890.6).

### Bicycle Parking and End of Trip Facilities

Part C3(A) of the WDCP 2011 specifies bicycle parking and end of trip facilities requirements. Part 7.6 of the NSW Planning Guidelines for Walking and Cycling provides further particulars on bicycle storage. The WDCP applies the rate of 1 bicycle parking space per 2 ILUs, and 1 visitor per 12 ILUs for seniors housing. The proposal provides 36 bicycle parking spaces for residents and 7 spaces for

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visitors, with secure areas each containing 18 bicycle parking spaces located in the Basement 1 car park in Stage 1, and the Basement 2 car park in Stage 2. The bicycle parking spaces satisfies the minimum WDCP requirements of 26 bicycle parking spaces for residents and 5 spaces for visitors.

The bicycle parking area provided in the south-east corner of the Basement 1 car park show a 1m aisle width between bicycle parking rows, however AS2890.3 Parking Facilities - Bicycle Parking requires a minimum 1.5m aisle width. The dimensions of the proposed secure bike parking enclosure is approximately 5m long and 7.2m wide. To provide the required 26 bicycle parking spaces, the enclosure should be increased to 5.4m long to accommodate one row of 14 bicycle parking spaces along the southern wall and one rows of 12 bicycle parking spaces separated by a 1.5m aisle. The double-door opening to the enclosure would also need to be reduced to a single door.

Changes to the car park layout would also be required to accommodate the modified bicycle parking area. The spacing between Resident No.18 and 19 is more than 2m and can be reduced to enable the increased size of the bicycle parking enclosure and a path between Resident No.20 and 21 spaces connecting to the Club lobby. Bicycle racks for six Visitor spaces could also be provided perpendicular to the southern wall.

The TIA states that any club bicycle parking requirements could readily be provided within the site based on future needs. The WDCP requires that bicycle parking facilities be provided for new buildings and for alterations and additions to existing buildings. Although no specific rates are provided for registered clubs, some bicycle parking should be provided for the staff of the new building and a rate of 1 per 200m2 GFA (High-Medium Security Level) used business and retail premises is considered appropriate. A rate of 1 per 200m2 GFA (High-Low Security Level) could also be applied for club patrons. The development should therefore provide at least 18 staff spaces (3,539m2 / 200m2) Class B and 18 visitor spaces Class C, for club patrons. End of trip facilities must also be provided for the new building, including bathroom/change areas and clothes lockers (900mm height x 350mm width x 500mm depth).

The staff bicycle parking (High-Medium Security Level - Class C), must be stored in individual lockers or locked rails within a secure room/enclosure. It appears that a secure enclosure providing at least two rows of 10 bicycle parking spaces including end of trip facilities could be located in the south-west corner of the Basement 2 car park, with the removal of 4 car park spaces (No.23, 24, 25 and 26). The bicycle parking area located in the Basement 2 car park in Stage 2 is therefore no longer required and can be converted to provide two staff Club parking spaces (2.5m wide x 5.4m long).

The Club visitor bicycle parking should be located for convenient access near the club entry. The Ground Floor plan shows 6 bicycle parking spaces located adjacent to the courier/delivery parking area. A total of 18 bicycle parking spaces could be provided by providing two rows of 9 bicycle parking spaces separated by a 1.5m aisle.

### Motorcycle Parking and Electric Vehicle Charging

Some motorcycle parking and publicly available electric vehicle charging points should be provided to encourage more sustainable modes of transport. A minimum of 2 charging points should be provided in the visitor spaces of the seniors car park, as well as provisions in the Club car park.

Three motorcycle parking spaces (2.5m long and 1.2m wide) can be provided in the Basement 1 car park between the Seniors lobby and the Resident No.5 accessible space. There are also many opportunities within the Club car park where marked motorcycle parking bays can be provided which do not affect vehicle or pedestrian access.

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The amended proposal is not acceptable in its current form, as it does not comply with the SEPP Housing 2021 car parking requirements for ILUs. The proposed parking does not provide sufficient number of resident accessible parking spaces in accordance with AS/NZS 2890.6. The car park layout also does not facilitate convenient access for visitors or residents, with the current location of the designated parking spaces and bicycle parking facilities. The proposal aims to provide surplus parking for the Club to accommodate future demand but does not cater for more sustainable modes of transport by providing adequate bicycle parking with end of trip facilities required by the WDCP. The development should also make provisions for electric vehicle charging and motorcycle parking spaces. Although the separate access driveways for the Loading Dock and at-grade car park is supported, the separation between the driveways should be increased to a minimum 3m to provide sufficient refuge for pedestrians. The overall proposal could however be supported subject to consideration of the recommended changes with updated amended plans.

#### Referral comments 16/01/25

The proposal is for demolition works and construction of a registered club and Seniors Housing development containing a total of 55 Independent Living Units (ILUs). The basement parking carpark contains a total of ??23 spaces comprising ??21 resident spaces and ??2 additional visitor parking spaces.

## Stage 1

Construction of a split five-level basement carpark

Construction of a registered club with a 2,948m2 GFA (decrease of 799m2 of GFA)

Construction of a new 16 Independent Living Units (ILUs) above the club building

## Stage 2

Demolition of existing registered club on site.

Construction of 39 Independent Living Units (ILUs) and ancillary uses.

Construction of a remainder of a one level basement car park.

### **Access**

Vehicular access to the development is provided at the southern end of the site. The location of the access driveways is situated in close proximity to the access driveway to the Council car park for the Forestville War Memorial Playing Fields. The location of two combined entry/exit driveways to large car park facilities each providing approximately 200 car park spaces is not supported. A central access driveway for the basement car parks should instead be located between the Club building and

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the three buildings for the Senior Housing development. This location is approximately midway between the access driveway to the Council car park and Bushland Avenue/Melwood Avenue intersection, providing good traffic sight distance and separation turning movements for vehicles entering and exiting onto Melwood Avenue. This arrangement was also recommended by the Design + Sustainability Advisory Panel (DSAP) at the meeting held on 28th November 2024. The DSAP also did not support the previous proposal as it required the residents to drive through the Club basement. The Transport Network team has greater concerns regarding club patrons driving through the private resident car park to access the Club parking spaces. Parking for residents should be separated by security shutters so that parking areas cannot be accessed by the public. The provision of a central access driveway would however address both the DSAP and Transport Network concerns if separate basement car park were provided for each user group.

## **Loading Area and Porte Cochere Access**

A proposed 4.2m wide entry only driveway and 6.2m wide egress only driveway is provided for access to the loading dock, at grade drop off and parking area which have been designed to accommodate the largest service vehicle required to access the subject site being an 8.8m MRV. The 4.1m access ramp to the basement loading dock does not provide sufficient width for trucks to pass. The TIA notes that an Operational Management Plan (OMP) for the club will consider loading dock management, however a traffic signal system must be provided to manage the movement of trucks entering and entering the loading area. The TIA has provided swept paths for a 8.8m medium rigid vehicles (MRV). Waste Services have advised waste trucks are heavy rigid vehicles and typically 10.5m long, 2.5m wide, service height 4.5m, travel height 3.7m, and the loading dock should be designed to cater for the largest vehicle type. Consideration and provisions should also be made with respect to how goods and services will be provided to cater for the residents of the senior housing. A Loading Bay (minimum Small Rigid Vehicle access) should be provided for servicing, removalists and bulky goods deliveries.

It is preferable to provide separate accesses to loading facilities and car park areas. The access driveway to the loading dock should provide two-way access for safe and convenient access to/from Melwood Avenue. The recommended relocation of the main access to the centre of the site will enable the driveway to be widened accordingly. The current egress driveway can therefore be reduced in width and changed to entry only for the Porte Cochere access and at-grade car park which includes an Ambulance Bay. The TIA provides swept paths for an ambulance reversing into the bay and entering in a forward direction. The Architectural Plans shows a kerbed landscaped area at the back of the Ambulance Bay which should be removed as it obstructs the rear loading of the ambulance.

#### **Parking**

The existing club has a gross floor area (GFA) of 3749m2, providing 86 car park spaces. This equates to a car parking demand of 2.4 spaces per 100m2 GFA (1 space per 41.6m2 GFA). A parking occupancy survey was conducted between 6:00pm and 10:00pm on Friday the 2nd of August 2024 and between 6:00pm and 10:00pm Saturday the 3rd of August 2024; to assess the travel patterns and parking demands for the Club.

The peak period was on Friday between 6:00-7:00pm, where the car park was at full capacity, with the survey indicating that the club peak demand would result in 90 vehicle parking spaces. The Club advised that a special event was held at this time resulting in the high parking demand.

The proposed club has a gross floor area (GFA) of 2948m2, proposing 99 car park spaces. The GFA for the proposed club is more than 20% less than the existing club, however an additional 13 spaces have been provided for the club. The number of club parking spaces provided seems excessive considering the reduction in GFA.

The proposed Seniors Housing portion of the development contains a total of 55 Independent Living Units (ILUs), comprising (27 x 2-bedroom and 28 x 3-bedroom units), which requires 69 resident spaces under the SEPP. A total of 11 resident visitor spaces is required, when applying the DCP rate

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of 1 visitor space per 5 units or part of dwellings.

The Traffic and Impact Assessment (TIA) incorrectly states that the development proposes a total of 99 car park spaces, comprising 90 spaces for residents and 9 spaces for visitors. The Architectural Plans however shows 84 spaces for residents and 15 visitor spaces.

The proposal therefore provides an excess of 15 resident parking spaces and 4 visitor spaces. The Architectural Plans show that all resident parking spaces are 3.2m wide and 5.4 long. No resident parking spaces have been designed in accordance with AS/NZS 2890.6. Part 1 of Schedule 4 of the SEPP specifies for a group of 8 or more parking spaces, at least 15% of the parking spaces must comply with AS/NZS 2890.6. If the development proposes 84 resident parking spaces, then 13 spaces must be designed to comply with AS/NZS 2890.6.

The Traffic and Impact Assessment (TIA) states that the Council DCP does not specify any bicycle or motorcycle requirements for registered club and seniors living. This is not entirely correct as Part C3(A) of the WDCP specifies the minimum bicycle parking requirements for Seniors Housing. Some motorcycle and bicycle parking should also be provided for the Club to encourage more sustainable modes of transport, as well as the provision of publicly available electric vehicle charging points.

The proposal is therefore unsupported.

Note: Should you have any concerns with the referral comments above, please discuss these with the Responsible Officer.

## **Recommended Traffic Engineer Conditions:**

Nil.

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