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Subject: Online Submission

29/10/2020

MR Wyndham Cramer
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RE: DA2020/1235 - 888 Pittwater Road DEE WHY NSW 2099

29 October 2020
257/28 Oaks Avenue
Dee Why NSW 2099

To Whom It May Concern:

Re: Public submission - DA2020/1235.
Use of premises as a car wash facility including fitout
Lighthouse Development, 888 Pittwater Road, Dee Why.

I note that the issue I raised in my original submission to DA2020/0714 re: congestion has still not been adequately addressed. In this context the following is relevant.

1. The response from CMA architects ("CMA") to the submissions to DA2020/0714 under the identified constraint "traffic" and the supporting report provided to CMA by Transport and Traffic Planning Associates ("TTPA"), of which key points are listed and commented on below.
 - a. The existing car parking is not operating at maximum capacity and spaces are freely available even at peak hours.
 - i. The assumption is the best-case scenario. The current utilisation of the car park is just one factor when assessing congestion levels.
 - ii. Future use of the car park is relevant and should have been considered. The Lighthouse is a relatively new development in the heart of Dee Why. It is only reasonable to assume that over time more people would access the retail facilities in the Lighthouse complex. In addition, the occupancy at Dee Why Markets is increasing which will attract more traffic to the area. Finally, there is evidence of an increase in work-at-home numbers especially in the Northern Beaches which could further contribute to an increase in patronage of the retail facilities in the vicinity. Combined, the most likely scenario is the increase in usage of the car park reaching full capacity.
 - iii. Irrespective of the overall utilisation of the entire car park, the specific issue is the bottleneck that would be created because of the need to drive past the car wash to enter or exit via the Howard Avenue. This matter has not been addressed.
 - b. The car wash bay being 20 meters away from the boom gate facility.
 - i. This is a moot point given that access to and from B3 will have to be through the designated areas of the car wash impeding the flow of traffic to the resident's car park through Howard Avenue.
 - c. The manual parking survey sample used by TTPA is statistically inadequate to draw reliable conclusions on either the current or future congestion levels that would be caused by the car wash. Notwithstanding this weakness, the survey did reveal that on Saturday the 5 of September the maximum occupancy was 75.7% and the minimum 65.0%. The denominator used to calculate this % was 395 retail parking spaces while the "car park" records presumably

from Meriton shows the total casual parking spaces as 338. If the Meriton number was used as the denominator, the maximum occupancy would have been 88.5% and the minimum 76.0%. What is also missing from the analysis is the access requirements of the 351 apartments in the complex. The survey reveals a scenario where the car park is already utilised to full capacity.

2. The Traffic Engineer Referral Response ("TERR").

a. The response simply states that "no objection is raised on the proposal on traffic grounds." Furthermore, there are no details of the responsible officer who made this determination or their contact details to seek more information on what was meant by "traffic grounds". The detail of the TERR must be published by the council elaborating on the traffic grounds that raised no objection. In any case I am contemplating a Government Information (Public Access) Act 2009 (the GIPA Act) request to discover all information in relation to this TERR. The TERR in its current form is severely lacking in detail, transparency and accountability and should not be considered in the decision-making process

Due to the above-mentioned reasons, I submit that the DA has not addressed the issue of traffic congestion and therefore should be rejected in its present form.

Sincerely,

Wyndham Cramer