
Sent: 29/10/2020 12:23:06 PM
Subject: DA2020/0514 - Objection
Attachments: 200783.01FA - Peer Review of Traffic Impact Assessment - 29 October 2020.pdf;

Hi Anne-Marie,

I have submitted an online response and attach our peer review report here.
Please confirm receipt.

Kind regards

--

Peter Kingsley

Traffic Engineer

B.E Civil

E: peter@mclarenttraffic.com.au

P: 02 8355 2440 M: 0432866183



M^CLAREN TRAFFIC ENGINEERING

Address: Shop 7, 720 Old Princes Highway Sutherland NSW 2232
Postal: P.O Box 66 Sutherland NSW 1499

Telephone: +61 2 8355 2440
Fax: +61 2 9521 7199
Web: www.mclarenttraffic.com.au
Email: admin@mclarenttraffic.com.au

Division of RAMTRANS Australia ABN: 45067491678 RPEQ: 19457

Transport Planning, Traffic Impact Assessments, Road Safety Audits, Expert Witness

29 October 2020

Reference: 200783.01FA

Northern Beaches Council

Sent via email to:

council@northernbeaches.nsw.gov.au

anne-marie.young@northernbeaches.nsw.gov.au

Attention: Council Officer and/or Councillor

TRAFFIC AND PARKING PEER REVIEW OF ALTERATIONS AND ADDITIONS TO MANLY BOATSHED AT 1B BOLINGBROKE PARADE, FAIRLIGHT NSW

Dear Council Officer and/or Councillor,

This firm has been engaged by the owner of 45 Fairlight Crescent, Fairlight to provide a Traffic and Parking Peer Review for the Alterations and Additions to Manly Boatshed at 1B Bolingbroke Parade, Fairlight NSW, with particular regard to the supporting documentation of the Traffic Impact Assessment (TIA) by *Traffix* and Statement of Environmental Effects (SEE) by *Planning Ingenuity*. This letter addresses parking and traffic issues of the proposal and/or expert analysis thereof.

1 Description of the Proposed Development

The subject development is 'alterations and additions' to an existing marina development, namely Manly Boatshed. For the purpose of traffic impacts the following nett change is proposed:

- No change to 39 moorings
- Removal of slipways
- Dry berth storage area for 108 craft, up to 7m length, with associated facilities for craft washing, personnel showering and waste disposal
- Increase in decking area for circulation of watercraft and on-site enjoyment of refreshments from the kiosk
- Addition of 'ancillary' kiosk with indeterminate floor area operating from 6am to 10pm
- No change to nil on-site parking provision

Marinas are a specific development type with parking rates in the RTA *Guide to Traffic Generating Developments* (2002) (RTA Guide) while kiosks are not a defined land use. For comparison purposes the kiosk should be considered as a café or restaurant type use being a dine-in premises without table service, though with some takeaway component.

It would be anticipated that there would a change in the traffic generating characteristics of the development due to the change in dry storage vessel mix and any demand for the kiosk, including

the outdoor seating area, and it follows that the development had a requirement to submit the TIA alongside the development application.

2 Parking Requirements

2.1 Existing Parking Provision and Requirement

2.1.1 Parking Permits

The existing development provides zero on-site parking and currently benefits from the supply of some 33 parking permits which are distributed as 20 permits for the mooring customers (1 per 2) and 13 permits for the staff and visitors to the business operation of Manly Boatshed. It is not made clear by either the applicant nor Northern Beaches Council (NBC) if the planned changes to Manly Parking Permit Scheme have been implemented such that the mooring owners would no longer receive parking permits, nor that the business operation will receive more than the one (1) permit specified under the Manly Parking Permit Scheme Framework July 2020. Indeed, it is the understanding of this firm that NBC has advised residents that the marina business will have all but one of the parking permits extinguished and not renewed. The TIA does not take any account of how a reduction in 32 parking permits will affect the proposal.

2.1.2 Parking Availability

The TIA does not provide a parking survey of nearby parking supply nor changes in availability through the peak operating times of the development. It is unknown the number of spaces available within the vicinity of site and how any of those spaces are impacted by duration of stay restrictions. The TIA makes a qualitative assessment based on some “a review of aerial photography over multiple days” and then proceeds to neither list which days of the week, which periods of the year or which times of times those images were taken. In doing so the TIA presents a baseless analysis of the potential impacts of the existing development and proper function of the surrounding parking environment. This firm has conducted a similar aerial photography desktop review and as shown in **Figure 1**, on the 26th September 2020 there was zero spare parking available within 200m walking distance of the site and that additionally there are several cars parking over the verge in driveways such that more than 100% of the public parking is being used. This is an obvious difference to that existing situation described in the TIA and leads to a low level of credibility of the TIA. Additional days of imagery are provided in **Annexure A**.



FIGURE 1: AERIAL IMAGE OF SITE ON 26/09/20 BY NEARMAP

2.1.3 Parking Rates

The TIA refers to anecdotal patronage and parking rates as described by the proprietor of the facility. While the operator may have decent intentions, no written records have been provided which would support the notion or permit audit. The TIA heavily relies on those existing rates to forecast future parking demand and in doing provides a flawed analysis. This firm does not necessarily disagree with the outcome of the parking rate, however the business had ample opportunity prior to submission of the DA to collect relevant data which would support their application. Collection of data during Covid-19 conditions may vary though may provide a more reliable baseline for analysis even if it is not as accurate as would have been available prior to altered community conditions.

There is some difficulty in reconciling the provided parking rate for passive craft patronage of “*three (3) spaces per day*” as this is not a traffic engineering unit of measure. This could be either of peak parking accumulation, daily trip ends, or some indeed some other measure. The *Response to RFI* by *Traffix* later clarifies that the unit was customers per day. The TIA again does not provide any survey or data to reflect the figures relied upon. Comparison to operator provided usage rates suggests average daily usage rates of 3.8 passive craft per day, though given an unknown concentration of trips on weekends, this is unable to be determined. Likewise, it is not clear how many people per party are accessing each craft such that the mode share data is reliable. In any case, this is not sufficiently robust as to permit assessment by NBC nor the local community. The operator can economically record for one or two calendar weeks the number of people accessing each type of craft and ask them were they a private vehicle driver or did they arrive by other means. Patron and parking surveys form the regular operation of parking demand analysis and should have been provided as part of the TIA.

It is recognised further that fluctuations throughout the year are possible for outdoor recreation and winter may exhibit lower rates of usage than summer. This is reflected in the RTA Guide where “*Substantial seasonal variations in marina usage involve peak traffic generation occurring particularly during weekends in summer*”, though the TIA does not account for any such operation.

2.1.4 Existing Parking Summary

This firm does not consider the TIA to suitably assess the continuing parking permit availability, the existing parking demand of the development, nor the availability of parking within proximity to the site. The lack of a sufficient baseline prevents reliable forecasting of future changes to parking demand due to the proposed alterations and additions.

2.2 **Proposed Car Parking Demands**

2.2.1 Residential

The residential component of the development does not generate any additional parking demand due to change in scale and it is expected the permit parking scheme caters adequately for the existing dwelling.

2.2.2 Tender to Moorings

The tender to moorings operations of the business has been continuing for decades and would be expected to operate in a similar fashion, except that the parking permit scheme no longer appears to afford the mooring sites with parking permits. Instead there would be a single permit provided for the whole business. If no permits are going to be available, there has been no attempt by the TIA to estimate the overspill parking resulting from the change. It is noted that the change in parking permit scheme details do not form part of the development application but it does have a material impact on the level of parking availability which would be utilised by changes in the other portions of the proposal.

For comparison the RTA Guide recommends parking provision at a rate of 0.2 spaces per swing mooring plus 0.5 spaces per employee, which equates to 8.3 (9) spaces for the 39 moorings if there is only one staff member. There have been no details provided by the applicant to suggest a lower rate of demand is generated currently and as such whether the existing parking availability accommodates this demand. The marina use is a highly seasonal enterprise with a peak on weekends in summer months, when it could be assumed that peak usage occurs of the nearby streets for parking for the foreshore walk. If mooring patrons are driving to the site and wish to enjoy their vessel for more than the 2 hours afforded within the parking permit area, then the parking impacts will overspill to other streets and extend the parking amenity impact to more residents.

2.2.3 Dry Storage

There does not appear to be a regulatory car parking rate for a facility which solely stores unpowered watercraft such as kayaks and comparison should therefore be made to the existing site if available or to some other similar development. This firm does not consider the rudimentary analysis in the TIA of the existing site to be reliable and therefore the extension to future usage is not possible using the same data. Instead comparison is made to the RTA Guide regarding marinas which suggests parking be provided at a rate of 0.2 spaces per dry storage berth plus 0.5 spaces per employee equating to 22.1 (23) parking spaces if there is only one staff member. Given the business may only have one (1) parking permit available in the near future and it would need to be assigned to a vehicle registered to the business name, it is unknown how the development intends to mitigate the potential impact of 23 parked vehicles within walking distance to the site. In lieu of more reliable data the TIA ought to have used the RTA Guide, and if only accounting for the increase of the number of dry stored vessels the 23 additional craft will demand some 4.6 (5) additional spaces. This represents three (3) more than the two (2) suggested by the TIA and there is no survey data to suggest that even the lower rate is available within proximity to the site.

2.2.4 Kiosk

The kiosk component of the proposal includes 19sqm of internal kitchen area plus seating both inside and outside operating from 6am to 10pm. Given the opening bi-fold doors along the south-west facing façade and lack of permanent structure to prevent flexible seating arrangements, the originally provided operational design of internal and external seating is considered the more likely result. In that case the seated area is 100sqm or more with a total kiosk area of 119sqm or more.

The TIA describes several types of users which may patronise the kiosk, predominantly referencing those who would be completing other boating operations. Unless the development proposes some mechanism to restrict dominant patronage user type it is disingenuous to not include and correctly analyse the actual likely users or otherwise demonstrate that a similar facility elsewhere has shown that type of function. Interestingly the architectural plans show not less than 30 seats in any of the versions cited and yet the TIA suggests 6 customers will access kayaks in a day. This firm considers it poor engineering practice to present such a case and further reduces any credibility of the TIA. It is not unreasonable to assume that the operator of the premises would not simply add more seating for the kiosk after opening up to the maximum practical capacity. The TIA presents an unrealistic situation given the nature of the site and should not be relied upon.

This firm understands the desire of the operator to expand the financial viability of the facility and take advantage of both the views from the deck and passing foot traffic from the foreshore walk. Staff of this firm have completed the Manly to The Spit walk socially and recognise the desirability of passive and active harbour access for recreation and enjoyment. The location within the Sydney Harbour is highly desirable for the unencumbered views. The response in support by the Balmoral Boatshed owner Steven Hedge describes the proposal as a “*world class waterfront experience*”. The TIA nevertheless supposes that the kiosk is entirely ancillary and that zero (0) patrons to the kiosk will have driven to the location for the purpose of enjoyment of the view while having coffee, cold beverages and other refreshments. This is an issue as there currently has not been shown to be any available publicly available parking in the vicinity of the site by the TIA nor has any additional parking been provided as a result of the proposal.

The proposed kiosk would serve the general public and would be expected to generate its own parking demand outside of passing foot traffic and as such should NOT be considered ancillary. Comparing the kiosk to other similar developments would present as a cafe or restaurant, though in any case there is no attempt to explain why the kiosk is required to open 16 hours per day. Further, if the kiosk is enhancing the financial viability of the site by selling coffee and snacks, then this firm does not foresee a viable level of patronage after 6pm which would justify the classification as anything other than a restaurant and certainly not an ancillary kiosk.

If the proposal were compared to the Manly DCP it would require 1 space per 40 sqm of publicly accessible area. That would require the subject development to provide not less than 3 parking spaces, which it does not supply. The RTA Guide includes cafes within restaurant category and land uses and requires parking be provided at the greater of 15 spaces per 100sqm or 1 per 3 seats. Without showing a plan with less than 30 seats the development is expected to generate demand for 10 parking spaces for the kiosk alone or even up to more than 15 spaces according to the floor space available. This demand is not reduced by a lower requirement in the DCP and was not even considered for analysis in the TIA. Given the site cannot accommodate any parking and no effort has been made to ameliorate the impact of 18 extra parked vehicles (120sqm) in the nearby streets, the development is not supported with regard parking for the kiosk alone.

Provision for staff at a rate of 1 per 2 staff is considered reasonable. Since the parking permit for the business operations would have to be assigned to a singular vehicle registered to the business, it is unclear how these staff members would be catered for. It is not credible to state for the purpose of development approval that the two kiosk staff members will be university students who won't drive when the kiosk is proposed to open at 6am and close at 10pm. The ongoing nature of a development approval cannot rely upon unenforceable statements and adds further to the lack of credibility of the TIA.

The TIA does not attempt to determine the parking demand of the site and is not a robust assessment of the parking impact of the kiosk. It is obvious that the site has little to no opportunity to provide parking on-site but that should not preclude sound traffic engineering practice from determining what level of public parking impact will be experienced by a proposal and that has not been done. The development is unsupportable with regard to parking supply for the kiosk.

2.2.5 Accessible Parking

A lack of provision for the disabled access to the site reduces the effectiveness of any disabled parking provision. This is not anticipated to be an issue and the nil provision proposed in the TIA is acceptable.

2.2.6 Servicing and Waste Collection

The site has no opportunity for on-site waste collection nor servicing and it is expected that generally this will be completed on street. Details of the commercial waste collection should be provided as if it is expected that substantial new waste will be generated in bins by the kiosk patrons. A waste statement would be essential to describe how a weekly kerbside bin pickup will be sufficient for the level of waste anticipated.

2.3 **Parking Summary**

The TIA neither attempts robust nor credible analysis of the parking impacts generated by the proposal and in doing so prevents assessment, though any increase in parking demand cannot be mitigated by the development as no vehicular access to the site is available. The increase in dry vessel storage and inclusion of the kiosk with a highly attractive deck and view will result in parking overspill into the local on-street parking environment. The TIA does not consider the combined parking impact of staff for the tender to moorings, staff for dry storage, staff for kiosk, patrons to moorings, patrons to dry storage, residents to the dwelling and patrons to the kiosk and a summary has been provided in **Table 1**. The table shows an expected demand of some 52 spaces which cannot be accommodated by the 3 parking permits which are all that appear possible under the new parking permit scheme currently in the process of being implemented.

TABLE 1: PARKING SUMMARY

Description	Scale	Demand Rate	Parking Demand	Supply Rate	Parking Supplied
Residential	1	2 spaces per dwelling	2	2 permits	2
Dry Storage Patrons	108	1 per 5 craft	21.6 (22)	Zero Supply	0
Dry Storage Staff	1	0.5 spaces per staff	0.5 (1)	Zero Supply	0
Kiosk Patrons	120sqm	15 per 100 sqm	18	Zero Supply	0
Kiosk Staff	2	0.5 spaces per staff	1	Zero Supply	0
Mooring Patron	39	0.2 per mooring	7.8 (8)	Zero Supply	0
Mooring Staff	1	0.5 spaces per staff	0.5 (1)	Zero Supply	0
Miscellaneous Staff				1 permit	1
Total	-	-	51.4 (52)		3

The TIA did not count prevailing capacity nor survey the availability of spare parking at peak times, and when compared to the demand of 52 parking spaces the development proposed is not supportable on grounds of parking impact.

3 Traffic Impacts

Given the lack of recorded patronage data, it is difficult to forecast traffic generation for the proposed development. The TIA should have detailed patronage data over one or two Saturdays to determine traffic arrival and departure rates and times. The reporting did not provide a reliable source of data for the purpose of analysis. Comparison is made to the RMS Guide regarding daily vehicle trip generation (vtpd) which projects the following:

- Residential – 10.7 per dwelling = 10.7vtpd
- Moorings – 1.4 per swing mooring = 54.6vtpd
- Passive craft – Use half of the mooring rate 0.7 per craft = 43.2vtpd
- Kiosk – assuming no dinner service 60 per 100sqm = 72vtpd
- Total = 181 vtpd
- Current total = 94 vtpd
- Nett Change = 87

It is apparent that the TIA estimating a difference of 4 vehicle trips (two in and two out) is drastically different from that envisaged by the RTA Guide. This firm does not anticipate that the increase of vehicle trips will be 87 vehicle trips on every Saturday, though in lieu or more substantial analysis being provided considers it a more reasonable outcome than 4 trips. Given the surrounding road network and the proximity of the site to the arterial road network, no substantial works are expected

to be required to ameliorate the difference in 87 trips per day, though the implication of this many trips is a substantial increase in parking demand which the TIA dismisses generally.

4 Summary

The proposed development of additional dry boat storage and a kiosk will generate additional demand for parking and no on-site provision is proposed. The TIA did not survey the existing parking environment, did not present credible and robust data on the existing parking demand of the site and generally supposes that there will be negligible change as a result of the proposal all of which is incorrect. The result will be overspill parking into the surrounding over-capacity on-street parking which is the subject of a permit parking scheme and would force site visitors and local residents to park further away than is convenient or envisaged by the implementation of the permit parking scheme. In not correctly analysing the demands for parking of the development it can then not also mitigate any level of resulting overspill and will significantly affect the amenity of the nearby residents. No waste management plan has been provided and there are concerns regarding the provision for waste disposal and servicing due to the nature of the site. The proposal for alterations and additions to Manly Boatshed in its current form is not supported for approval on traffic engineering grounds and should be refused by Northern Beaches Council.

Please contact the undersigned should you require further information or assistance.

Yours faithfully

McLaren Traffic Engineering



Craig McLaren

Director

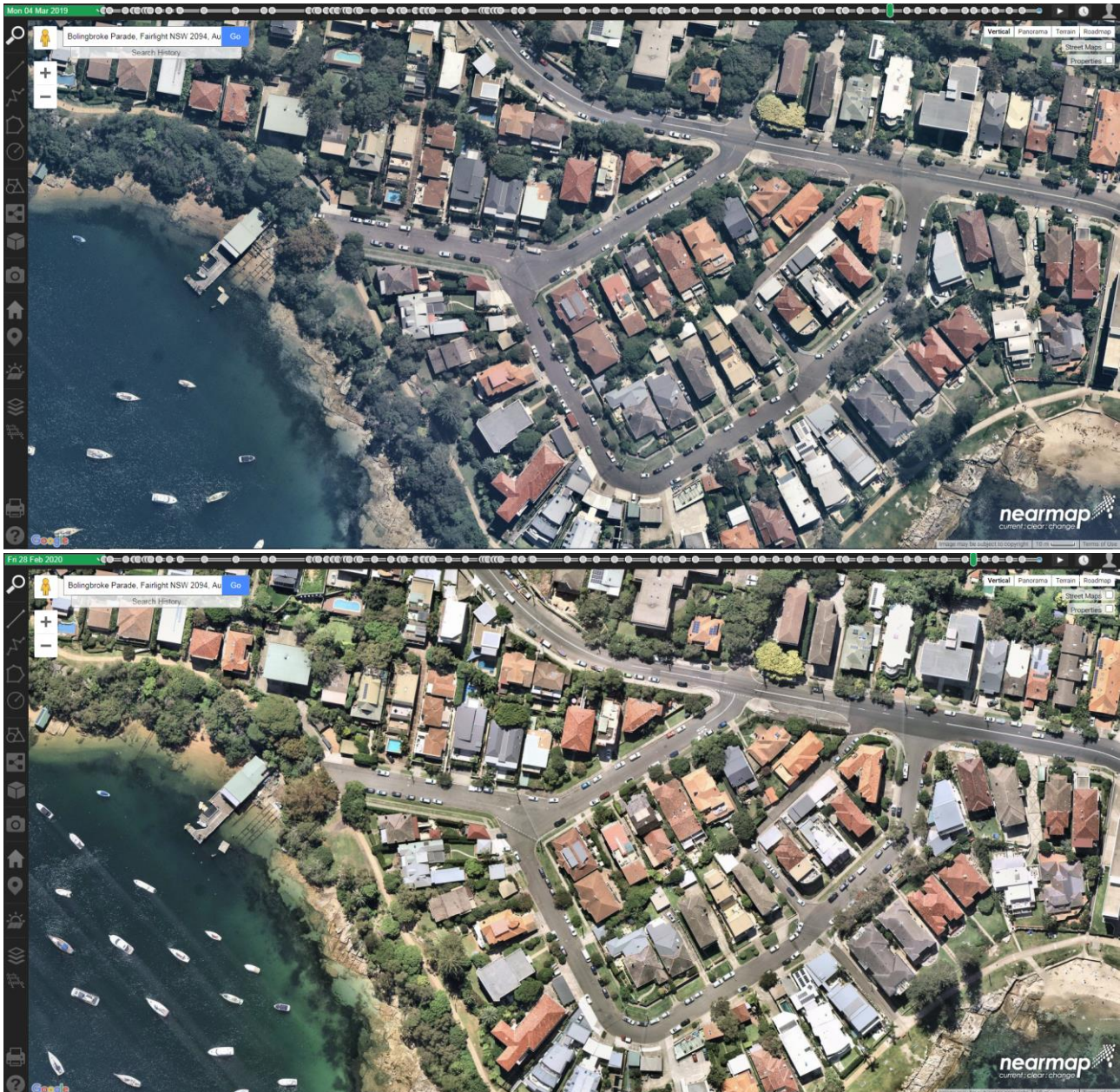
BE Civil, Grad Dip (Transport Engineering), MAITPM, MITE

RPEQ 19457

RMS Accredited Level 3 Road Safety Auditor [1998]

RMS Accredited Traffic Management Plan Designer [2018]

ANNEXURE A: ADDITIONAL AERIAL IMAGERY OF THE SITE FROM NEARMAP



ANNEXURE A: ADDITIONAL AERIAL IMAGERY OF THE SITE FROM NEARMAP

