



Ref: 0395r02v02

28/03/2022

Swell Trading Pty Ltd
c/-
Chenchow Little Pty Ltd
6 Belmore Street
Surry Hills NSW 2010

Attention: Adam Hoh

**RE: 8 GROSVENOR PLACE, BROOKVALE (DA 2021 / 2559)
LETTER OF RESPONSE TO COUNCIL**

Dear Adam,

We refer to recent correspondence concerning the abovementioned development and in particular, the subject Development Application DA 2121 / 2559, which is currently under assessment by Northern Beaches Council.

We understand that Council's Traffic Engineer has reviewed the DA and accompanying Traffic Impact Assessment report (ref: 0359r01v02) dated 10/12/2021 (TIA Report), prepared by PDC Consultants, and issued a Traffic Engineer Referral Response dated 23/02/2022 which raises a number of issues regarding the parking and traffic generation rates adopted within the TIA Report.

We confirm that we have taken Council's comments into consideration and now provide the below response. For clarity, we have reproduced the relevant comments from the Traffic Engineer Referral Response separately below which are highlighted. Our response is provided underneath each comment.

Parking

The developer's traffic consultant has calculated the parking requirement for the development using the car parking rates in the Warringah Development Control Plan for Industry and Transport – Warehouse or Distribution Centre which require:

1.3 spaces per 100m² GFA (including up to 20% of floor area as office premises space component.
Office premises component above 20% determined at office premise rate).

Calculated as follows:

637m² @ 1.3 spaces per 100m² GFA = $637/100 \times 1.3 = 8.3$ spaces

The office floor space of 126m² is less than 20% of the GFA (127.4m²) and therefore no additional car parking spaces calculated at the office rate were considered necessary.

As the development is for sale and servicing of motor vehicles the use of warehouse rates for calculating parking is queried with the parking rates for the development more appropriately determined from those for "vehicle sales or hire premises" i.e 0.75 spaces per 100m² of site area plus 6 spaces per work bay. As the site has an area of 1053.7m²

PDC Consultants

PDC Consultants (Aust) Pty Ltd | ABN: 70 615 064 670
info@pdcconsultants.com.au | www.pdcconsultants.com.au
+61 2 7900 6514 | Level 14, 100 William Street, Woolloomooloo NSW 2011

and there are two work bays denoted by the car hoist and the vehicle cleaning and detailing bay this would equate to a parking requirement of 19.9 bays (rounded up to 20).

The warehouse proposal is indicating a total of 52 car spaces provided within the premises, via the use of 4 level car stackers. The architecture plans indicate six 4-level car stackers along the northern wall, and seven 4-level car stackers along the southern wall. The bulk of these spaces would however be cars on display for sale so could not all be considered as on-site parking.

It is noted that only 8 of the parking spaces have been allocated for use by staff and visitors with the remaining 44 required for operational needs of the development i.e required for display of motor vehicles for sale. Given the above, the parking requirements of the development are therefore considered unsatisfied.

It is also noted that no indication has been provided with regard to which spaces will be used for staff and visitor parking. These spaces would need to be dedicated and remain available at all times for staff and visitors. Spaces located in car stackers are generally considered unsuitable for use as visitor parking and, while it is noted that it is intended that visitor's vehicles will be valet parked by staff, use of those spaces will be inconvenient particularly as it is noted that the ground floor space needs on each stacker unit needs to be vacant to allow overhead spaces to be accessed. This is likely to result in high levels of congestion and potentially hazardous conditions for pedestrians within the site, particularly if multiple customers are being served and is likely to result in overflow onto the street as cars are shuffled.

A review of the parking arrangements and further information in a detailed plan of management are required to detail how the required 20 staff and visitor spaces will be provided and managed efficiently. At this point the allocation of this number of staff and visitor spaces in car stacker units is considered to be an over reliance upon mechanical parking and likely to leave insufficient parking available for the operational needs of the development

In responding to the Traffic Engineer Referral Response, we believe it is critical to firstly provide clarification on the proposed operation of the development as this should assist Council's understanding of the proposal, and associated traffic and parking impacts.

We agree with Council's comments above in that the proposed land use is better defined as a 'vehicle sales or hire premises', rather than a warehouse. The development will however be considerably different to a typical 'vehicle sales or hire premises' having regard for the following operational characteristics:

Business Model

- The Applicant currently operates the business at another (off-site) location and intends to move the business to the subject site.
- The business involves the trading (buying / selling) of high-end (luxury) and rare vehicles. The Applicant typically purchases vehicles, holds onto them for a period of time ranging from months to years as the value of the vehicles appreciates, before then offering the vehicles for sale at a premium price.
- Due to the high cost of vehicles, customers are confined to wealthy individuals.
- For comparative purposes, the development will operate similar to the following luxury car dealers located in Sydney:
 - Scuderia Graziani in Woolloomooloo (<https://www.scuderia-graziani.com/>)
 - Classic Throttle Shop in North Sydney (<https://classicthrottleshop.com/>)

Volume of Sales and Visitations

- Based on previous experience, the Applicant expects:
 - To sell only 10-20 cars per year.
 - On average, a maximum of one (1) customer attending the site each day, who would typically be on-site for one (1) hour. Accordingly, most of the time, there will be no customers on-site. Some overlap of customers may occur infrequently however, there would generally be no more than two (2) customers on-site at any one time.
- The above sales and visitation numbers are significantly less than that of typical vehicle sales premises, such as a Hyundai or Toyota Dealership, which sell hundreds, if not thousands, of vehicles each year and have thousands of customers inspecting vehicles each year.

Marketing and Sales

- Vehicles will be marketed via the business website.
- Customers will contact staff via phone or website enquiry to schedule an inspection of a vehicle/s (Sale Vehicle). Importantly, no unscheduled 'walk-ins' will be permitted.
- Staff will arrange for a Sale Vehicle/s to be relocated to one of the vacant bays on the bottom level of the stacker, prior to arrival of prospective purchaser.
- Upon arriving at the site, customers will be marshalled to stand their vehicle within the parking aisle by a staff member. The staff member will then park the customer's car within one of the designated parking spaces.
- The low number of visitations and scheduling of all vehicle inspections means staff will have ample time to shuffle Sale Vehicles within the stackers prior to the arrival of customers to the site.

Number of Staff

- The development will operate with two (2) to three (3) on-site staff during hours of operation. Again, this is substantially less than other typical car dealerships.
- Staff will be responsible for numerous tasks including but not limited to, administration, cleaning of building and cars and servicing of cars using the hoist.
- Importantly, it is noted that the cleaning bay and car hoist are provided for cleaning and servicing of the Applicant's on-site luxury / rare vehicles only. No cleaning or vehicle servicing services will be offered to the general public.

With regard to the above, it is clear that the use of the site as a vehicle sales or hire premises will be vastly different to that of a typical such facility. Nevertheless, adopting Council's DCP parking rate of '0.75 spaces per 100m² of site area plus 6 spaces per work bay' to the proposed development, results in a parking requirement for eight (8) car parking spaces. As noted above, the proposed cleaning bay and car hoist (work bays) are ancillary facilities for the cleaning and servicing of the Applicant's on-site vehicles only, and therefore car parking for the work bays is not required. Additional car parking for the 'work bays' would only be required if the development was to offer vehicle servicing and / or cleaning to the general public, customers etc.

In response, the development provides a total of 52 car parking spaces including eight (8) spaces for staff / customer parking and 44 spaces for storage of Sale Vehicles, which complies with the requirements of Council's DCP. **Figure 1** below shows the location of the eight (8) car parking spaces, being the bottom car space in each of the identified stackers.

Even in the unlikely event that all staff and customers were to travel to the site in a private vehicle, the development would only generate a peak demand for five (5) car spaces, being three (3) staff spaces and two (2) customer spaces. The provision of eight (8) car spaces for staff / customer parking will therefore ensure that all typical staff and customer parking demands are wholly accommodated on-site, with up to three (3) vacant spaces being available at all times which will assist in shuffling of cars in the stackers and accommodate any non-design peak parking demands.

Importantly, it is reiterated that shuffling of cars would occur prior to customers arriving at the site. In this regard, when shuffling does occur, there will be a total of five (5) vacant spaces on-site including the three (3) vacant spaces that will be available at all times plus the two (2) customer spaces which would also be vacant noting customers would not be on-site. The five (5) vacant spaces will ensure that cars can be easily shuffled within the stackers and ensure that these activities can be wholly accommodated within the site. The limited number of visitations and volume of sales will provide staff with ample time to shuffle cars as required and will not result in any congestion or hazardous conditions for pedestrians as contemplated by Council above.

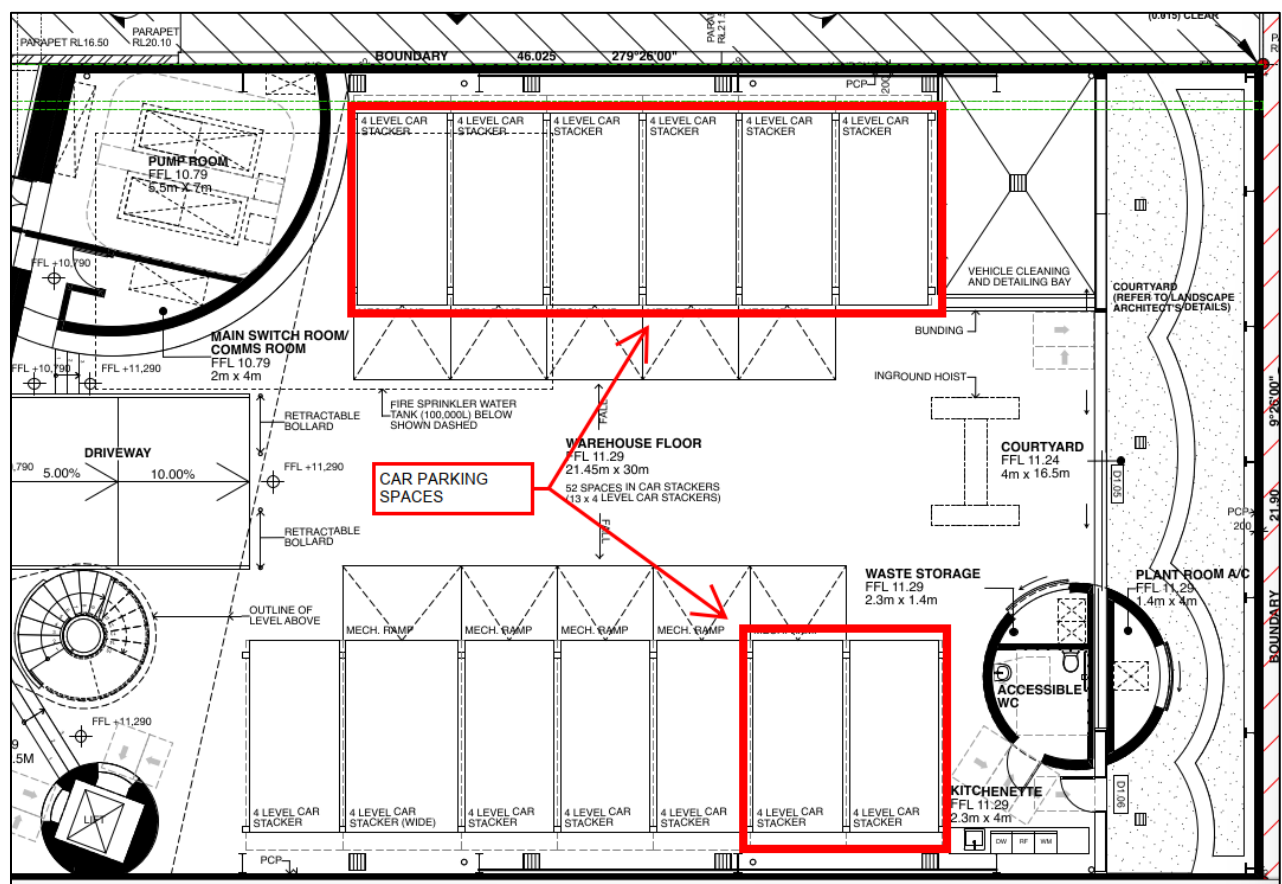


Figure 1: Location of Car Parking Spaces

Traffic Generation

The traffic report has used rates in the RMS's Guide to Generating Traffic Developments, to calculate the traffic generation from the site. The rates are:

Office and Commercial

- Daily Vehicle Trips @ 10 per 100m² GFA = $126/100 \times 10 = 12.6$
- Evening Peak Hour Vehicle Trips @ 2 per 100m² GFA = $126/100 \times 2 = 2.52$

Warehouses

- Daily Vehicle Trips @ 4 per 100m² GFA = $637/100 \times 4 = 25.5$
- Morning Peak Hour Vehicle Trips @ 0.5 per 100m² GFA = $637/100 \times 0.5 = 3.2$

Total:

- Daily Vehicle Trips = $12.6 + 25.5 = 38.1$
- Morning Peak Hour Vehicle Trips = 3.2
- Evening Peak Hour Vehicle Trips = 2.5

As noted above regarding parking rates, the development is more accurately assessed as a motor showroom rather than a warehouse. The applicable evening peak traffic generation rates for motor show room are 0.7 per 100sqm of site area. This would equate to 7.4 evening peak hour trips. A similar rate in the am peak would be anticipated.

The existing structure on-site is an industrial development providing commercial services as a concrete supplier with 2 separate buildings on-site totalling approximately 230m² GFA.

The traffic generation rates for factories are:

- Daily Vehicle Trips @ 5 per 100m² GFA = $230/100 \times 5 = 11.5$
- Evening Peak Hour Vehicle Trips @ 1 per 100m² GFA = $230/100 \times 1 = 2.3$

Given the above the net increase in traffic generation from the site would be in the order of 5 peak hour vehicle trips in the peak periods. This level of additional traffic will not impact to a significant level on the surrounding road network.

Consistent with the above discussion, we agree with Council in that the traffic generation of the proposed development will be more consistent with that of a 'motor showroom', and the resultant traffic generation of the development will be in the order of five (5) trips or less during peak periods. This level of traffic generation will have no material impact on the surrounding road network and the traffic impacts of the development are considered acceptable.



We trust the above satisfactorily addresses the concerns raised in the Traffic Engineer Referral Response dated 23/02/2022. Please contact the undersigned should you have any queries or require anything further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Paul Corbett', with a long horizontal stroke extending to the right.

Paul Corbett
Director, PDC Consultants

Email: pcorbett@pdcconsultants.com.au