

Our Ref: M210618 9 February 2024

Ms Adam Croft Principal Planner Northern Beaches Council PO Box 82 MANLY NSW 1655

Dear Mr Croft,

Applicant Submission to Traffic Engineer Referral Response No 46 Prince Alfred Parade, Newport (DA2023/0951)

Planning Ingenuity has prepared this response on behalf of the applicant, Royal Motor Yacht Club Broken Bay.

We have prepared the following response to the questions raised by the Council's Traffic Engineer following consultation with *Traffix Traffic and Transport Planners* and the Royal Motor Yacht Club Broken Bay.

This response is provided as supplementary information to the details provided in the Statement of Environmental Effects and Traffic and Parking Assessment Report provided with the development application.

The RMYC would be prepared to meet with yourself and Council's Traffic Engineer onsite to review the proposed development and the proposed traffic and parking arrangements that will support both its construction and operation.

If you have any questions, please do not hesitate to contact me on (02) 9531 2555 to discuss this proposal in detail.

Yours sincerely, Planning Ingenuity Pty Ltd

Troy Loveday

Princial Planner



Miranda NSW 2228

P 02 9531 2555



Issue	Response		
Parking requirements and design			

The Pittwater DCP applies to the subject site. The DCP does not provide a parking rate for Clubs however refers applicants to the TfNSW Guide to Traffic Generation Developments. This guide advises that parking must be provided to satisfy the average maximum demand and recommends that the characteristics of the proposed development be taken into account with comparisons drawn with similar clubs. As the developer is not proposing any change to existing membership levels they have argued that there is no requirement for any additional parking. This argument is not supported. The increased floor area, which caters largely for additional dining and social facilities will greater levels attract patronage from the existing membership and their quests and on-site parking capacity must be demonstrated to be adequate. The existing parking

Council acknowledges the parking assessment undertaken in the TIA is in accordance with Pittwater DCP and TfNSW Guide to Traffic Generating Developments, noting that parking has been provided to satisfy the average maximum demand of the RMYC.

It is reiterated that the proposed works are intended to improve the experience and assist with the retention of existing RMYC members and will not increase patronage on site.

RMYC has repeatedly affirmed its operations is constrained to the available car parking capacity of 282 spaces and maintained a Car Parking Plan of Management (CPPoM) to actively manage on-site parking demands, this document was submitted to Council as part of the development application.

Further reference is made to the RMYC membership numbers reported to the board as summarised in Figure 1, showing a steady decline in membership numbers which is expected to decline further due to increase in membership fees. The full membership report is provided at Attachment 1.

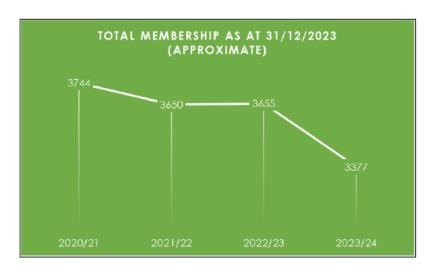


Figure 1: RMYC Membership Numbers

occupancy rates should either be factored up to cater for the additional floor space or additional parking provided drawn from rates for the uses of the expanded facilities eq restaurant rates for the new dining area floor space i.e. the greater of 12 spaces per 100 m² of GFA or 1 space per 3 seats.

While it may seem intuitive that adding more facilities to a club would attract more patrons, there are multitude of reasons suggesting that this is not the case:

Renovation/Refurbishment: It is reiterated that the proposed development seeks to refurbish the existing club facilities to improve amenity and upgrade member services. It is pertinent to note the only new facility provided as part of this proposal would be the gym which is to complement its existing swimming pool uses.

Overcrowding: Increasing facilities without expanding the overall space of the club may lead to overcrowding. This can result in a less enjoyable experience for patrons as they may find it challenging to navigate through crowded spaces. The proposal therefore seeks to provide additional facilities and GFA to address potential overcrowding in the club.

Increased Costs for Patrons: More facilities often come with increased operational costs, and these costs may be passed on to patrons in the form of higher entry fees, drink prices, or additional charges. This can deter potential customers, especially in current economic conditions and evident by declining membership mentioned earlier.

Constrained Parking: RMYC acknowledges its parking is limited and understands if parking is difficult to find it can deter future patronage. It is therefore, reasonable to expect that demand at the club will be self-regulating.

In summary, the existing off-street car parking provision will continue to satisfy RMYC's operational requirements and satisfactorily managed by RMYC's CPPoM.

The parking requirements for other uses such as yoga studio and gym should be addressed in the traffic report. In particular are these facilities available only to vacht club members or are they available to the general public. Such facilities will undoubtedly attract new members or attract existing members to visit the facility more often. This in turn will increase parking demands.

Patrons within 5km must be signed in by a member to use the facilities, including its yoga studio and gym. It is noteworthy that the RMYC has a swimming pool and these facilities are to complement its use by existing members.

Again it may be intuitive that adding other uses such as a yoga studio and gym would attract more patrons. However, specialised venues that focus on specific activities or themes may attract patrons seeking a more tailored experience. RMYC would therefore likely struggle to compete with these specialised alternatives and these additional facilities could not be expected to result in an increase in membership numbers or patronage numbers

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How will this additional parking activity be catered for?	
There is a conflict in the total GFA of the proposed extension. Traffic report mentions an additional GFA of 1,010m² (page 10), whereas the Statement of Environmental Effects report mentions an additional GFA of 773m² (page 29). The applicant must clarify which floor area increase is correct and amend the reports as appropriate to ensure a consistent floor area is quoted across all the reports. If the floor area increase in the traffic report is incorrect it must be amended and the report updated to reflect the correct GFA and car parking requirements should be based on the correct GFA.	The proposal involves an increase in GFA of 773m² as indicated on the architectural plans prepared by MCHP Architects and submitted with the Development Application.
The traffic report mentions a total of 282 existing car parking spaces (page 7), whereas the Statement of Environmental Effects report mentions 290 car parking spaces (page 20). This discrepancy in total number of car parking spaces must also be	 Reference should be made to the CPPoM which specifies the following in relation to RMYC parking: Provision of a total of 282 spaces including 4 accessible spaces. All 292 spaces must be available at all times and not be obstructed by anything other than motor vehicles. It is understood that all spaces are generally available for staff, visitor, members and boat owners, noting the following: Traffic Information Specialist who undertook the parking survey have confirmed parking recorded beyond capacity in A1 was a data entry error and included staff parking in A4.

resolved. In addition, the car parking spaces should be broken down into staff parking, visitor parking, member only, boat owner member parking etc i.e to clarify what parking spaces are available for what uses and at what times of the day. If some parking spaces are unavailable to some users of the Yacht Club this must be detailed and such spaces clearly marked on the plans. The parking survey data would appear to suggest that some areas of the carpark are not available to all patrons, as some areas of the carpark are highly utilised (or in the case of area A1 parked beyond capacity), while other areas are poorly utilised eg Area D1. The reasons for this need to be explained and a more fine grained analysis of the parking occupancy data undertaken. Council's concern is that despite the clubs Car Parking Plan of Management the and information in the parking surveys, the complete picture has not been revealed. Visitors to the club experience difficulty

- If staff parking is underutilised it would be because parking is readily available on site without the need to enforce staff to park within their designated parking area, which can be enforced by RMYC.
- If reasonable to expect patrons will prefer to park close to the entrance as with any other development, and there is no surprise to some further areas of the car park being less utilised, showing capacity is available in parking areas further away from the building.
- The parking surveys identified seven (7) trailer parking spaces which were underutilised during the survey period, this should not be exaggerated to suggest that "some areas of the carpark are not available to all patrons".

The same claim of the extent and frequency of illegal parking on Prince Alfred Parade and its association with RMYC has been conclusively decided before Justice Preston in Land and Environment Court appeal (2016/158192) under the approval of development application No 379/15.

finding offstreet parking at present and there continues to be on-street illegal parking activity around the Motor Yacht Club which is not being effectively managed by the existing measures. Although no increase in member numbers is proposed it is never-theless considered likely that the development will increase competition for parking and exacerbate on-street illegal parking problems.

The parking surveys undertaken on 6th and 8th of January 2023 are consistent with industry requirements to capture RMYC's parking demands during its peak trading period.

surveys undertaken on January 6 & 8 2023 which show a maximum occupancy of 85% at 1:30pm-2pm on Sunday and suggests that this demonstrates that there is ample spare capacity on a typical Friday and Sunday. Making such assertions on the basis of two partial days of traffic data is not supported. Surveys should be undertaken over a range of weekends in spring and summer with the absence of any data for Saturdays or in the evening

between 4:00pm and 8:00p.m

The traffic report presents

It is considered onerous and excessive to conduct surveys over several weekends during both Spring and Summer afternoons/evenings, with no regard for the applicant's required resource intensity including manpower, time and financial investment. Accordingly, the surveys undertaken as part of the TIA is well-planned and targeted to estimate RMYC's peak parking demands and considered satisfactorily.

Further reference is made to the Parking Assessment (ref: 0046101v1) prepared by *Ason Group* dated 28 June 2016 provided in Attachment 2 which undertook parking surveys over the Anzac Day long weekend on 23^{rd,} 24th, and 25th April 2016. The report concluded that all parking demands could be sufficiently accommodated within the existing carpark noting the surveys conducted in January 2023 has shown a decline in parking demands.

The same claim of the extent and frequency of illegal parking on Prince Alfred Parade and its association with RMYC has been conclusively decided before Justice Preston in the Land and Environment Court appeal (File No 2016/158192) under the approval of Development Application No 379/15.

concerning as this would generally be expected to be a time of high parking activity. It is therefore requested that further surveys be undertaken over several weekends at peak times (Spring/Summer weekend afternoons/early evening). Council receives numerous complaints from the residents residing near the Yacht Club about illegal parking along Prince Alfred Parade during events hosted at the RMYC and infringements and warning notices are often issued by Council's Rangers. If offstreet parking is adequate such activity should not be occurring. The surveys must break down parking occupancy data into members parking, visitors parking, boat owner parking, staff parking and detail the utilisation of each category at the various surveyed times.

The traffic report must provide

details on additional staff as a

result of the proposed extension

and provide advice on where

existing and proposed additional

It is understood the proposal will not be increasing its existing staff numbers, and RMYC will be able to redistribute their existing staff to operate all existing and proposed facilities.

Staff is currently encouraged to park in staff parking areas but not required due to parking availability, noting RMYC can enforce staff to park in the staff car park at any time.

staff will park. It is noted that the staff parking area 13 spaces) is currently very under utilised which leads to questions about where staff are parking. The relatively isolated nature of the location does not lend itself to staff walking. cycling or catching public transport to work so how do staff travel and where do they park?	
Further details with regard to longer term parking activity by members who might park and depart by boat is required and information on the number and location of spaces used for such activity. In addition if there are any spaces allocated to specific members or staff the numbers, locations and utilisation of these must be assessed in the parking occupancy surveys.	Both the TIA prepared in 2023 and Parking Assessment approved in 2016 demonstrate the existing off-street car parking provision satisfies RMYC's operational requirements and can be satisfactorily managed by RMYC's CPPoM. It is pertinent to note that the matters relating to the existing off-street parking provision being able to satisfy RMYC operations has been conclusively decided before Justice Preston in the Land and Environment Court appeal of DA 379/2015.
The development does not propose any additional parking however it is not accepted based upon the above comments that the adequacy of the existing parking has been demonstrated.	Noted.

If new spaces are proposed they must be designed to comply with AS 2890.1 with provision made for disabled parking at a rate of 3% of the required parking for the new development work. Disabled parking spaces must be designed in compliance with AS 2890.6 and an accessible path of travel must be available from those spaces into and through the buildings via pathways and/or lifts.	Not applicable.
Motorcycle parking must be provided at a rate of 1 space per 100 motor vehicle spaces in accordance with the Pittwater DCP.	There is no requirement for motorcycle parking to be provided as the proposed development does not propose to change the car parking provision on the subject site. It is noted that the RMYC encourages its members to travel to the premises by motorcycle and any car space is available for use by riders of motorcycles or motor scooters.
Bicycle parking must be provided at a rate of 1 bicycle rack per 1000 m2 GFA or a minimum of 4 bicycle racks, whichever is the greater in accordance with the Pittwater DCP.	There is no requirement for bicycle parking to be provided as the proposed development does not propose to change the car parking provision on the subject site. It is noted that the RMYC encourages its members to travel by alternative transport modes such as walking and cycling. Space for parking bicycles is located adjacent to the building entry.
The issue of illegal parking activity at kerbside on Prince Alfred Parade has not been	RMYC has had extensive discussions with officers from Northern Beaches Council (and the former Pittwater Council) about illegal parking that occurs in Prince Alfred Parade in the vicinity of the site. The parking occurring outside residential properties in Prince

addressed in the traffic report. It merely advises that such parking activity is illegal however if there is "ample" offstreet parking why are users of the facility choosing to park illegally on-street. The traffic report should be updated to add additional commentary on this issue

Alfred Parade does not appear to have any relationship to the RMYC. We have understand the following factors are relevant to this issue:

- Some residents of properties in Prince Alfred Parade who cannot access their driveways in wet weather will park on the street instead of negotiating steep and slippery driveways.
- Many of the cars parked on Prince Alfred Parade belong to tradespersons associated with houses that are undergoing building work.
- Visitors to properties on Prince Alfred Parade will park on the roadside due to these properties having no visitor parking available.

All of these scenarios have no connection to the RMYC and it is not the responsibility of the RMYC to resolve this issue or to be penalised for the behaviour of local residents and their visitors.

Loading and Servicing

The traffic report mentions there are no changes to the existing servicing arrangements (section 5.5, page 11) but provides no information to outline what these are. The plans also provide no information with regard to loading and servicing bay locations and size. With the proposed expansion works it is reasonable to assume that there will be an increase in servicing and delivery requirements and details must be provided on how existing and proposed deliveries will be managed.

The proposal does involve any change to its existing loading/servicing arrangements which will continue to operate in accordance with the Land and Environment Court approval of DA 379/15.

Council has a full record of the development history including previously approved loading/servicing arrangements.

Details must be provided on the existing loading activities, the size of regular delivery and serving vehicles, the location and size of loading bays, and swept paths must be provided for access to and from these loading bays by the largest intended vehicle accessing the site. The applicant must demonstrate that there is adequate provision for off-street access for delivery vehicles together with adequate parking and turning areas for delivery and service vehicles on site within appropriate proximity to the buildings being served.

Existing loading arrangements for the site will be maintained with the new development. These arrangements that rely upon delivery trucks accessing the site's lower level to unload adjacent to the boat ramp will not be altered by the new development. Waste collection from the site will also be unchanged and existing arrangements will continue.

Traffic Generation Impact

The traffic report mentions extensive surveys having been undertaken by the applicant's Traffic Consultant however no details on the type of development, their size and location or any data to support the nominated average traffic generation rate have been provided. The traffic report

The traffic generation rate adopted in the TIA is based on the traffic data collected by *Traffix* at various clubs as summarised in Table 1.

should be updated to provide the above details to enable and assessment of their validity.

Table 1: Club Traffic Generation Rates

Club	GFA (m²)	No. of trips at site peak	Trip Generation Rate (veh/hr per 100m²)
CabraVale Diggers Club	14,629	342	2.34
St Johns Bowling Club	4,946	113	2.28
Canterbury Leagues Club	15,763	396	2.51
Guildford Leagues Club	5,290	118	2.23
Etalong Bowling Club	3,580	90	2.52
		Average	2.38

Traffic levels at these clubs are expected to be more intensive than a yacht club which caters for a very specific demographic, and therefore considered conservative.

Notwithstanding, it is again noted that the proposed development seeks approval to improve dining and social facilities for existing members (and will replace the existing facilities which are dated and need refurbishment). It should therefore be emphasised that the proposed development does not seek to increase patronage on site, and instead, the proposed works intend to improve the experience of its existing members.

In any event, the off-street parking provision will remain unchanged and would not encourage any additional traffic activity.



ATTACHMENT 1 - RMYC MEMBERSHIP REPORT



TOTAL MEMBERSHIP (APPROX) AS AT 31 DECEMBER 2023

	YTD	YTD	YTD	YTD
	2023/24	2022/23	2021/22	2020/21
Boat Owner/General	1038	1096	1095	1101
Senior Boat Owner	173	179	184	180
Social Members	1019	1115	1116	1216
Senior Social Members	155	157	162	166
Associate – Boat	485	530	527	507
Associate – Social	302	341	345	384
Senior Associate - Boat	47	50	53	45
Senior Associate - Social	27	27	31	29
Junior (up to 18 yrs)	37	57	26	17
Intermediate (18-25 yrs)	50	60	64	53
Other	44	43	46	46
TOTAL	3377	3655	3650	3744

New Members:	46 made up of	Boat Owner	7
		Associate to Boat Owner	2
		Social	31
		Associate to Social	4
		Intermediate	2

Renewals for December 2023 123

Members resigned for September 2023: 53 from 236 Renewals (22.5%) (12 Boat Owners)

Left message, no response	22	Still deciding	2
Moved	8	Not using	2
No reason given	7	Too expensive	1
Will renew	5	Changed to RPAYC	1
No answer	4	Requested Absentee	1

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ATTACHMENT 2 - PREVIOUS PARKING ASSESSMENT

Reference: 0046l01v1



28 June 2016

Royal Motor Yacht Club (Broken Bay) Pty Ltd C/- Hamptons Property Services Pty Ltd PO Box 954 Edgecliff NSW 2027 info@asongroup.com.au +61 2 9083 6601 Suite 1404, Level 14, 101 Grafton Street Bondi Junction, NSW 2022 www.asongroup.com.au

Attention: Kristy Hodgkinson

RE: Proposed Marina Extension, Royal Motor Yacht Club – Parking Assessment

Dear Kristy,

Ason Group has been commissioned to undertake an additional assessment of off-street parking impacts of the proposed extension (the Proposal) at the Royal Motor Yacht Club located at 46 Prince Alfred Parade, Newport (the Site). This assessment has been prepared to supplement the previous assessment undertaken in the Ason Group Traffic Impact Assessment (TIA) report dated February 2016 (the Ason Report).

Similar to the previous methodology, we have undertaken additional parking surveys, analysed the survey data, forecasted the future parking demand and assessed the impacts of the future parking demand. Reference should be made with the findings of the Ason Report, which provides background and context regarding the Site and the parking demands associated with the proposed extension. The findings of our assessment are documented below.

Survey Methodology

The additional parking surveys were undertaken on Saturday 23 April, Sunday 24 April and Monday 25 April 2016, between the hours of 9.00AM and 5.00PM, over the Anzac Day long weekend. This survey period was specifically scheduled for this weekend to provide results that would be fairly representative of the marina's current operation during standard busy weekend periods.

At the time of the surveys it was found that a total of 287 parking spaces are provided for club members, marina members and visitors. The weather conditions were generally fine throughout the survey period, with the exception of Saturday which experienced periods of rain. However, the weather conditions during the Saturday survey would not be considered to be a significant deterrent to the operations of the marina during the Anzac Day long weekend. In this regard, the weather conditions over the survey period would be considered reasonable for boating activities.

Existing Parking Utilisation

The results of the survey are presented graphically in Figure 1, Figure 2 and Figure 3. The following data trends were observed for each day:

- Saturday parking demand increased fairly uniformly from the start of the survey at 9.00AM before levelling of at about 175 occupied parking spaces from 1.30PM through to the conclusion of the survey at 5.00PM.
- Sunday parking demand increased fairly uniformly from the start of the survey at 9.00AM and gradually peaked at about 220 occupied parking spaces at 4.00PM.
- Monday parking demand increased fairly uniformly from the start of the survey at 9.00AM before peaking at approximately 200 occupied parking spaces from 1.00PM through to 3.30PM with a substantial decrease onwards.



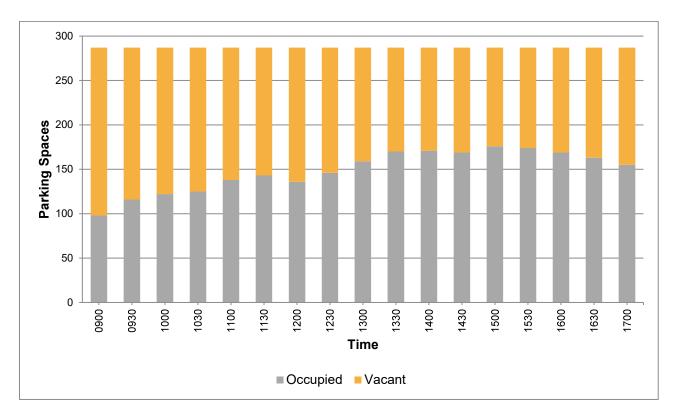


Figure 1: Parking Occupancy, Saturday

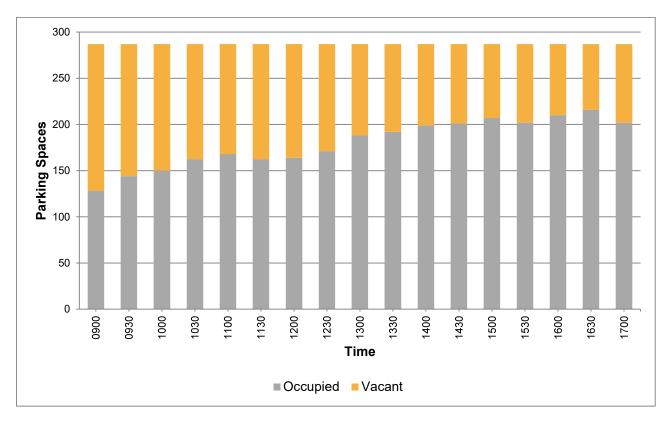


Figure 2: Parking Occupancy, Sunday



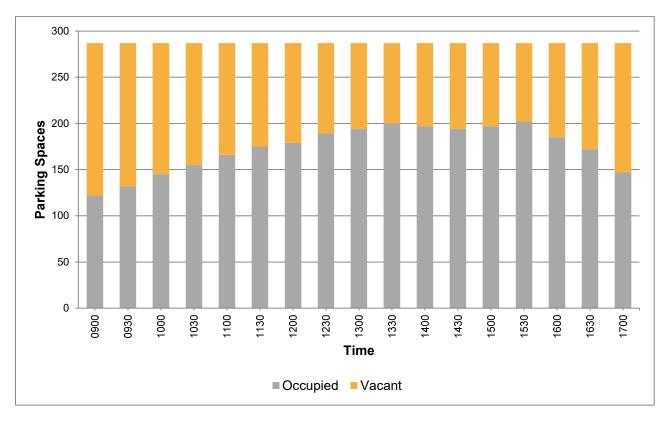


Figure 3: Parking Occupancy, Monday

In detail, the results indicate that:

- On the Saturday, parking availability was at its lowest at 3.00PM with 176 occupied spaces representing 64% occupancy. However, at this time there were 111 vacant spaces, equivalent to 36% of the 287 onsite parking spaces.
- On the Sunday, parking availability was at its lowest at 4.30PM with 216 occupied spaces representing 77% occupancy. However, at this time there were 71 vacant spaces, equivalent to 23% of the 287 onsite parking spaces.
- On the Monday, parking availability was at its lowest at 3.30PM with 202 occupied spaces representing 72% occupancy. However, at this time there were 85 vacant spaces, equivalent to 28% of the 287 onsite parking spaces.

Seasonal Factors

As described in the Ason Report, the following seasonal trends were identified:

- Occupancy was higher in warmer months than in cooler months. The winter average was 47% and summer was 84%, suggesting a median of 66% occupancy.
- The occupancy of 'shoulder' periods (i.e. between busy summer periods and the low activity of winter periods) would be in the order of 66%.

Having regard for the above, the recent weekend parking survey indicated peak daily occupancies of 64%, 77% and 72% for Saturday, Sunday and Monday respectively, which results in an average peak weekend occupancy of 71%. This is relatively consistent with the shoulder period occupancy described above.

Recognising that average weekend occupancy is higher during the summer months, it is assumed that the parking demand during the summer periods would be 18% higher than that recorded during the recent surveys. Figure 4, Figure 5 and Figure 6 present the forecasted parking occupancy during summer months for the respective surveyed periods based on the application of seasonal factors.



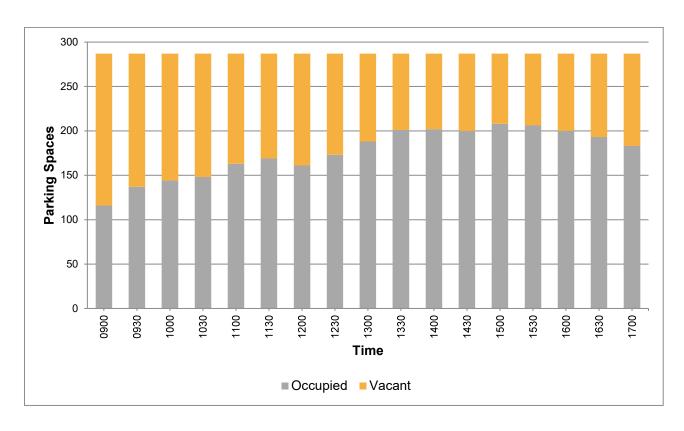


Figure 4: Parking Occupancy, Saturday (Seasonally Adjusted)

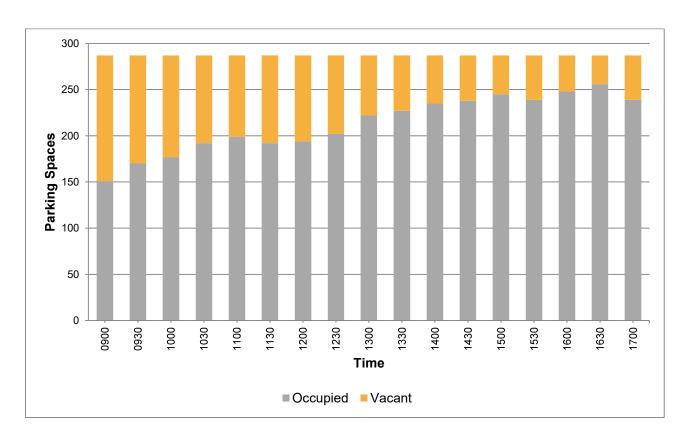


Figure 5: Parking Occupancy, Sunday (Seasonally Adjusted)



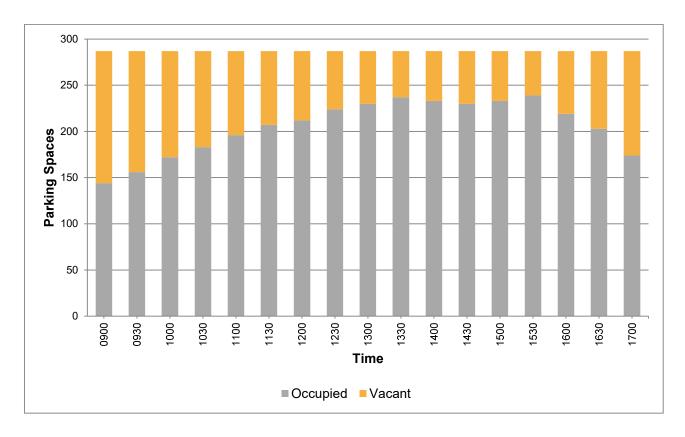


Figure 6: Parking Occupancy, Monday (Seasonally Adjusted)

The seasonally adjusted parking demands indicate that:

- On the Saturday, forecast parking availability would be at its lowest at 3.00PM with 208 occupied spaces representing 73% occupancy. However, at this time there would be 79 vacant spaces, equivalent to 27% of the 287 on-site parking spaces.
- On the Sunday, forecast parking availability would be at its lowest at 4.30PM with 256 occupied spaces representing 89% occupancy. However, at this time there would be 31 vacant spaces, equivalent to 11% of the 287 on-site parking spaces.
- On the Monday, parking availability would be at its lowest at 3.30PM with 239 occupied spaces representing 83% occupancy. However, at this time there would be 48 vacant spaces, equivalent to 17% of the 287 on-site parking spaces.

Parking Assessment

The additional parking demands generated by the Proposal were assessed based on parking rates obtained from the following documents:

- Australian Standards 3962-2001 Guidelines for design of marinas, Standards Australia (AS3962)
- Guide to Traffic Generating Developments, Roads and Maritime Services (RMS Guide)
- The Traffic and Parking Implications of Marina Developments, Christopher Hallam & Associates Pty Ltd (the CHA report)

Application of the parking rates resulted in the following anticipated increase in parking demand:

- 8-17 spaces as per AS3962
- 22 spaces as per RMS Guide



• 5 spaces as per the CHA report

Having regard for the above, under a 'worst case' scenario the additional parking demand generated by the Proposal would be 22 parking spaces. Application of this demand on the seasonally adjusted parking occupancy results in a future parking demand as shown in Figure 7, Figure 8 and Figure 9.

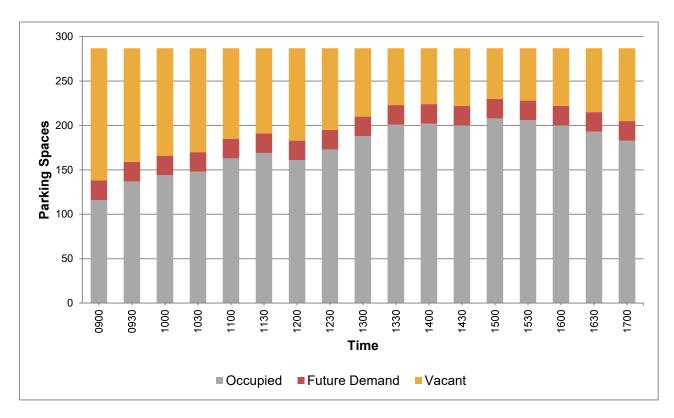


Figure 7: Future 'Worst Case' Parking Occupancy, Saturday (Seasonally Adjusted)



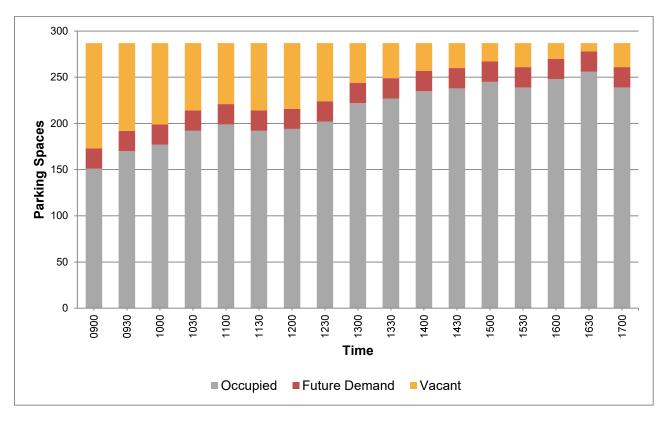


Figure 8: Future 'Worst Case' Parking Occupancy, Sunday (Seasonally Adjusted)

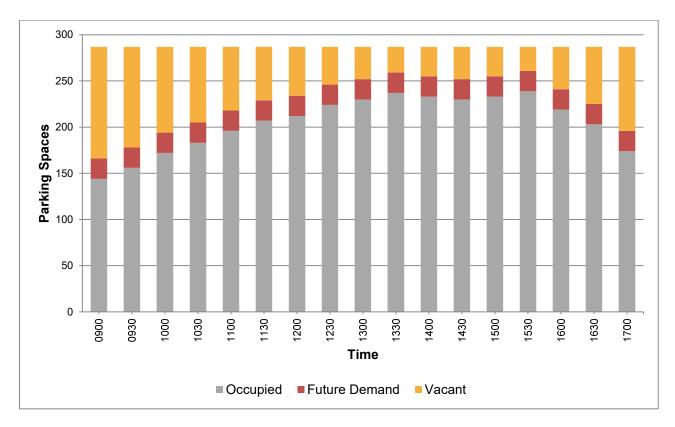


Figure 9: Future 'Worst Case' Parking Occupancy, Monday (Seasonally Adjusted)



The analysis above clearly demonstrates that even under a 'worst case' scenario – whereby the Proposal generates up to 22 additional parked cars during the summer months – the existing car park would satisfactorily accommodate this additional demand. The results demonstrate that the maximum forecasted parking demand would be 278 spaces during Sunday with 9 vacant parking spaces. This is consistent with the findings of the assessment undertaken in the Ason Report, which forecasted a maximum parking demand of 274 spaces and 8 vacant parking spaces.

Summary

In summary, the additional parking demand would be in the order of 5 to 22 parking spaces. An analysis of the 'worst case' scenario of parking demand of 22 parking spaces demonstrates that the car park could sufficiently accommodate this demand. Accordingly, the parking assessment above demonstrates that the Proposal remains supportable on parking grounds, without the need for additional on-site car parking. Furthermore, the findings are consistent with the findings of the parking analysis presented in the Ason Report.

Yours sincerely,

Piran Trethewey

Director - Ason Group

Email: piran.trethewey@asongroup.com.au