

## Traffic Engineer Referral Response

<b>Application Number:</b>	DA2024/1684
<b>Proposed Development:</b>	Alterations and additions to an approved shop top housing development
<b>Date:</b>	06/03/2025
<b>Responsible Officer</b>	
<b>Land to be developed (Address):</b>	Lot 1 DP 1001963 , 638 Pittwater Road BROOKVALE NSW 2100

### Officer comments

This application seeks to provide an additional 20 apartments through the construction of an additional storey residential accommodation to an approved shop top housing development at 638 Pittwater Road, Brookvale. A Traffic Impact Assessment (TIA) has been prepared by Apex Engineers (dated April 2024), with respect to the parking and traffic generation impacting the road network.

### Traffic Generation

The future traffic generation has been assessed in accordance with Roads and Maritime Services (RMS) 'Guide to Traffic Generating Developments'. The TPA states that the proposed additional 20 residential units generates 4 vehicle trips during the AM peak hours. The existing retail/commercial site generates 29 vehicle trips during the weekday peak hours. The traffic generated by the proposed additional 20 apartments is unlikely to have any material impact on the operations of the local transport network.

### Car Parking

The development site currently provides a total of 152 car park spaces across the basement car park levels. The Architectural Plans shows 65 residential spaces on Basement Level B3, 22 residential spaces + 9 visitor spaces + 28 commercial spaces on Basement Level B2, and 28 commercial spaces on Basement Level B1.

The Architectural Plans shows the following mixed-use areas:

Commercial (Unit 1)	= 863m <sup>2</sup> (662+201 Mezzanine)
Basement Commercial	= 763m <sup>2</sup>
Retail/Business (Unit 2 & 3)	= 167m <sup>2</sup> (130+37 Mezzanine)
SOHO (Unit 1-8)	= 794m <sup>2</sup> (591+203 Mezzanine)

The applicable parking rates and required number of spaces are:

Commercial (Unit 1)	= 22	@ 1 space per 40m <sup>2</sup> (863/40m <sup>2</sup> )
*Basement Commercial	= 19	@ 1 space per 40m <sup>2</sup> (763/40m <sup>2</sup> )*
Retail/Business (Unit 2 & 3)	= 10	@ 1 space per 16.4m <sup>2</sup> GLFA (167/16.4m <sup>2</sup> )
SOHO (Unit 1-8)	= 20	@ 1 space per 40m <sup>2</sup> (794/40m <sup>2</sup> )
Total for mixed-use	= 52 spaces	

(\*71 if Basement Commercial area is used as offices)

The previously approved 40 residential units (1 x studio unit + 23 x 1 bed units + 2 x 1 bed and study units + 10 x 2 bed units + 4 x 3 bed units) requires 44 residential spaces and 8 residential visitor spaces.

The additional 20 residential units (13 x 1 bed units + 5 x 2 bed units + 2 x 3 bed units) proposed on the Third Floor Plan requires 22 residential spaces and 4 residential visitor spaces under the WDCP 2011.

The TIA states that the approved development includes 53 surplus car parking spaces and that the required 26 spaces can be accommodated, with a remaining surplus of 27 car parking spaces. The TIA overstates the number of surplus spaces, based on the mixed uses for this site as an office rate of 1 space per 40m<sup>2</sup> GFA was applied to all non-residential areas. Therefore the required number of spaces would be at least 104 car park spaces, which is a surplus of 48 spaces and not 53. If the basement commercial area (763m<sup>2</sup>) was also to be used for office purposes and included in the GFA, an additional 19 car park spaces would be required which reduces the surplus to 29 spaces.

The required 26 spaces for the additional 20 residential units can be accommodated within the existing car park, however it should be noted that retail and commercial uses, especially takeaways and restaurants; have greater parking rate requirements (2.5-6 times higher than office rates) so the surplus may not be sufficient depending on the future usage.

The development must also make provisions for accessibility and adaptability. According to the WDCP 2011, where a development comprises at least five (5) dwellings, 10% (rounded up to next whole number) of dwellings shall be capable of being adapted (Class C) under AS4299, and provide a 3800mm wide adaptable space. The development site which includes the approved 40 units and proposed 20 additional units, requires a total of 6 adaptable spaces. The proposed Third Floor Plan shows Units 46 and 48 as Adaptable Units but Units 44 and 45 are proposed as Liveable Units. The Liveable Housing Design Guidelines requires that Silver Level car park spaces be at least 3200mm (width) x 5400mm (length). The Architectural Plans show a total of 12 disability parking spaces, which provides sufficient needs for the overall site. However, at least 6 disability parking spaces should be allocated to the residential units, and at least 1 disability parking space should be provided for each of the mixed uses.

The modified Condition 85. Surplus Parking Spaces for the approved Modification of Development Consent DA2019/0239 granted for demolition works and construction of a mixed-use development at 638 Pittwater Road, Brookvale; states that the 53 surplus car parking spaces must not be allocated to any of the proposed apartments or retail tenancies. They may be used for visitor/customer parking prior to any redevelopment of the site but must be available to be reallocated when an application for the redevelopment of the site is lodged (i.e. any application to add additional apartments).

The overall development site should therefore provide for the following parking allocation:

- Provision of 66 Resident spaces, including at least 6 spaces capable of being adapted (Class C) under AS4299 (minimum 3.8m wide) or designed for people with disabilities in accordance with AS/NZS 2890.6.
- Provision of 12 Resident visitor spaces, including at least 1 space for persons with a disability.
- Provision of 22 spaces for Commercial (Unit 1), including at least 1 space for persons with a disability.
- Provision of 10 spaces for Retail/Business (Unit 2 & 3), including at least 1 space for persons with a disability.
- Provision of 20 spaces for SOHO (Units 1-8), including at least 1 space for persons with a disability.
- Any surplus parking spaces are to be used for visitor/customer parking only and may only be reallocated to the Commercial Unit 1 if the parking demand requirements are greater than those applied for office uses (1 space per 40m<sup>2</sup>).

The previously approved DA2019/0239 for the shop-top development including the 40 apartments, provided future proofing with the provision of additional basement parking and the potential use of the upper-level basement for retail/business purposes. Depending on how this area shown as Basement Commercial (763m<sup>2</sup>) is used, the Commercial Unit 1 (662m<sup>2</sup>) above may not have direct lift access to the Basement Level B2 parking levels as Lifts L1, L2 and L5 are all located on the current plans as part of the residential parking areas. A review of the car park layout should be undertaken with allocation of the minimum required 66 Resident spaces and 12 Resident visitor spaces (instead of the 88 Resident spaces and 9 Visitor spaces shown across the Basement Level B3 and B2 plans), so that a portion of commercial car park area can be located below Commercial Unit 1. This will ensure direct access to the commercial basement parking spaces using Lifts L2 and L5, where connectivity may not be possible if the entire Basement Commercial area was used for purposes other than parking.

### **Bicycle Parking and End of Trip Facilities**

Part C3(A) of the WDCP 2011 specifies bicycle parking and end of trip facilities requirements which would apply to this development. Part 7.6 of the NSW Planning Guidelines for Walking and Cycling provides further particulars on bicycle storage.

The rates for the residential component are 1 per dwelling (High-Medium Security Level) and 1 per 12 dwellings (High-Low Security Level) for visitors. The development requires a total of 60 resident 60 spaces (Class 2 - locked to rails within a secure room/enclosure) and 5 visitor spaces (Class 3- locked to high quality rails).

The rates for businesses and retail premises are 1 per 200m<sup>2</sup> GFA (High-Medium Security Level) and 1 per 600m<sup>2</sup> GFA (High-Low Security Level) for visitors. The development requires 9 staff spaces (792+238m<sup>2</sup>+763)/ 200m<sup>2</sup> Class 2 and 3 visitor spaces (1793m<sup>2</sup> / 600m<sup>2</sup>) Class 3, for the businesses/retail tenancies (Units 1-3).

The rates for office premises are 1 per 200m<sup>2</sup> GFA (High-Medium Security Level) and 1 per 750m<sup>2</sup> GFA (High-Low Security Level) for visitors. The development requires 4 staff spaces (591+199m<sup>2</sup>)/ 200m<sup>2</sup> Class 2 and 1 visitor spaces (790m<sup>2</sup> / 600m<sup>2</sup>) Class 3, for the office tenancies (Soho Units 1-8).

The overall development should provide 60 residents spaces and 13 staff spaces Class 2 (locked to rails within a secure room/enclosure); and 5 visitor (resident) and 4 visitor (business/retail) Class 3 (locked to high quality rails).

The Architectural Plans shows a total of 54 bicycle spaces (12 spaces in basement level 1, 2 spaces in basement level 2, and 40 in basement level 3), which is less than the WDCP 2011 requirements. All bicycle parking spaces are provided with double bike racks, which is only suitable for visitor parking (Class 3). Furthermore, no end of trip facilities appear to have been provided for the entire development.

The TIA states that an additional 22 bicycle spaces, comprising 20 resident and 2 visitor spaces; be provided as part of the conditions of consent and that there is ample area in the basement car park level to accommodate the required bicycle spaces. The Applicant should show on amended plans the location of the required 20 residents bicycle parking spaces as they should be conveniently located together in a secure enclosure accessible for the residents. The location should not obstruct circulation within the car park or access to parking spaces.

All resident and staff bicycle parking must comply with the WDCP 2011 which requires a secure room/enclosure (Class 2). Basement Level B2 Plan shows an area marked as 'STORAGE' immediately north of the security boom gate for the residential parking area. This would be a possible location for the additional 20 resident bicycle parking enclosure which would require a minimum area measuring 5m long x 5.1m wide, to provide 2 rows of 10 bicycle parking spaces (1.8m x 0.5m) separated by a 1.5m wide aisle. This would require changes to the parking layout so that resident car park spaces 10, 11 and 12 are adjacent with the column relocated to the eastern side of car park space 12. The existing column located near the boom gate could then be removed so that it does not obstruct the access to the secure enclosure.

There is an existing bicycle parking area on Basement Level B3, which could provide the required 40 bicycle parking spaces for the approved 40 residents, however this would also need to be provided in a secure enclosure.

The development must provide visitor bicycle parking for both the residential (5 spaces) and non-residential (4 spaces) components. The stand-alone bike racks (for 2 bicycles) located on Basement Level B1 near L4 lift and on Basement Level B2 near the Resident parking space 15, may comply for visitors to the Retail/Business or Soho Units but it is unlikely that they would be able to easily locate the facilities within the basement car park levels. It would be more convenient for visitors, if the bike racks could be located on the ground floor paved areas near entrances without obstructing access. could be located together on Basement Level B2, on the eastern side of L4 lift. Alternatively all visitor bicycle parking spaces could be provided in one area on Basement Level B1, where 5 double bike racks are shown near car park space 1, with clear wayfinding signage.

The end of trip facilities must be provided for mixed-use buildings in accordance with WDCP 2011 and include a bathroom/change room containing at least one toilet and shower cubicle. Clothes lockers must also be provided for every required bicycle parking space.

The Basement Level B1 Plan does show 2 unisex toilets labelled WC 3 and WC 4 in the north-eastern corner of the Retail/Business Unit 1 basement area, however this is likely to be used for the units own purposes. The location is not accessible for Retail/Business Unit 2 and 3 or for Soho Units 1-8, and there does not appear to be any other toilet facilities in the non-residential part of the building.

The south-eastern corner of the Basement Level B1 Plan is marked as 'STORAGE' but there are no walls or lines outlining the extent of the area. This would be a suitable location for toilet facilities

including a shower cubicle, that services the above ground floor retail/business and SOHO units which could be accessed by both nearby lifts and stairs. Ideally the staff bicycle parking should also be conveniently located in this area, if minor adjustments can be made to accommodate all of the required services. A secured bicycle storage facility for staff providing 13 vertical bicycle parking racks (1.2m long x 0.5m wide) and lockers (0.5m depth x 0.35m wide x 0.9m height) can be provided within an area measuring 4.5m long x 3.9m wide. If there is insufficient space on the Basement Level B1, the staff bicycle storage enclosure could be located on Basement Level B2, between the ramp and L4 lift. This would not be very convenient for cyclists as it would require accessing the building from the ground level off Charlton Lane, use L4 lift to the staff bicycle parking on Basement Level B2, use the L4 lift again to access Basement Level B1, and then walk through the car park to get to the bathroom and shower facilities.

The proposal is not acceptable in its current form. The Architectural plans should be updated to show the required parking allocation and further consideration should be made with regards to the car park layout and parking access to the different mixed-use components, especially Commercial Unit 1. There is insufficient details regarding the location of bicycle parking, level of security and lack of end of trip facilities. The TIA does not specify the location of the additional resident bicycle parking spaces, which are not clearly assigned within the basement car park. Some of the existing bicycle rack locations are also randomly located without much thought for the user, especially visitors who would be unfamiliar with the parking layout. Bicycle parking spaces for residents and staff must also be High-Medium Security Level, where the bicycle frames and wheels are locked to high quality rails within a secure room/enclosure. There are also insufficient end of trip facilities with no shower cubicle, change room or lockers provided for bicycle users. Furthermore, the 2 toilets provided are located in the basement level of the Business/Retail Unit 1, which is not accessible to other users in the building. Additional toilet facilities incorporating a shower would provide the necessary amenity for the rest of the business/retail and SOHO units, and it is preferable that the staff bicycle storage enclosure with lockers be located in close proximity for access. It is requested that the above suggestions be considered to address the issues and Architectural Plans updated prior to further review.

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.