

Traffic Engineer Referral Response

Application Number:	DA2022/1164
Proposed Development:	Demolition and construction of a commercial building - AMENDED PLANS
Date:	07/03/2023
Responsible Officer	
Land to be developed (Address):	Lot B DP 102407 , 34 - 35 South Steyne MANLY NSW 2095 Lot 2 DP 861591 , 34 - 35 South Steyne MANLY NSW 2095

Officer comments

Amended comments relating to amended report and plans – 07/03/2023

Proposal description: Demolition and construction of a commercial building

The applicant has made some amendments and provided further information in relation to the concerns raised in Traffic Referral Response on 11 November 2022.

Some of the amendments/further information include:

- The proposal has slightly changed its development GFA comprising 192.4m² GFA of Restaurant Serviced Area and 1,394.02m² GFA of commercial premises (a total of 1,586.42m² GFA). Previously, it was 199.4m² GFA of Restaurant Serviced Area and 1,386.5m² GFA of commercial premises (a total of 1,585.9m² GFA)
- A total of 13 parking spaces, including 2 tandem stackers, 2 car share spaces plus a separate loading bay (for loading/delivery vehicles up to the size of a 6.4m long Waste Wise Mini Garbage Truck) has been provided for the development.
- It is proposed to allocate the car parking spaces to the employees and staff of the commercial offices and restaurants. The proposed parking arrangements would therefore minimise the level of traffic activity in Rialto Lane by restricting traffic flows to the less intensive employee and staff uses only, without the more intensive levels of traffic activity which would be generated by customer uses of those parking spaces. The constrained nature of the carpark and the presence of car stackers also means the layout of the carpark is more suitable for those who might use the facility on a regular basis.
- The applicant's traffic consultant advises that Council's traffic engineer has "indicated that car share spaces would be considered equivalent to 3 parking spaces each". This is not the case. The outcome of the discussion was that Council did not support the use of car share in this location as there was already a significant number of car share vehicles operating within the Manly Town Centre. If the applicant wanted to allocate the spaces for employee pool car use, this was not opposed however no reduction in parking requirements would apply as a result of such use. While consideration to approval of a lower level of parking than DCP rates would be given, in view of the site constraints, it was not envisaged that anything less than a 50% reduction in the required parking would be supportable.
- The proposed new mixed-use building is expected to be serviced by a variety of light

commercial vehicles such as the Hyundai iLoad or similar white vans, and small trucks up to and including the 6.4m long Waste Wise Mini Garbage Truck which requires an overhead clearance of 2.08m.

The Traffic team has reviewed the following documents:

- Plans (Master Set), Amended – issue for DA, designed by DURBACH BLOCK JAGGERS, dated 10/01/2023,
- Amended Traffic and Parking Assessment report prepared by Varga Traffic Planning dated 23 January 2023,
- Addendum Statement of Environmental Effects prepared by Boston Blyth Fleming Town Planners dated 27th January 2023, and
- Traffic Referral Responses to DA2022/1164 dated 11/11/2022.

There were a number of traffic concerns raised in the Traffic referral comments dated 11 November 2022 that have not been adequately addressed in the Amended Traffic and Parking Assessment Report.

Parking Requirements and Design

- The parking requirements for the development are 39.6 parking spaces (rounded up to 40). The development proposes a total of 13 car parking spaces including two (2) carshare parking spaces, and two (2) tandem stackers. There is therefore a shortfall of 27 parking spaces.
- As outlined in the Traffic Referral comments dated 11/11/2022, a 50% reduction in parking requirements is considered the maximum that could be supported and the use of car share spaces at this site is not supported. The allocation of spaces for staff car pool use (as opposed to car share) is not opposed but this does not reduce the development's parking requirements. In the original Traffic Referral comments, it was suggested that the removal of the basement commercial floor space could potentially free up space below ground for additional parking/loading areas as well as reducing parking requirements associated with the development.
- Swept path plots for access to and from the development have been provided for the largest vehicle (6.4m long Waste truck) entering/exiting the site from Rialto Lane and then entering/exiting the carpark ramp. It is noted that that this turning path is based upon entry via eastbound travel on Rialto Lane (which is appropriate) with sufficient space to pass a parked truck within the Loading Bay on the north side of Rialto Lane.
- Given that the ramp and the carpark circulation roadway are single-width, and as the carpark appears to have no where for opposing vehicles to pass, vehicles may encounter on another on the access ramp or in the carpark and be unable to pass. A waiting bay inside the carpark and a signal system to manage ingress/egress movements should be included in the amended plans. The above will ensure that passing opportunities for vehicles in opposing directions will be available and shall be demonstrated by swept path plots for a B99 passing a B85 vehicle.
- A vertical clearance assessment on the driveway ramps has been undertaken and demonstrates that the proposed waste truck can access the carpark with adequate clearance.
- It is noted that stairs are proposed above car space number 8. For compliance with AS2890.1 section 5.3.1, the height between the floor and an overhead obstruction shall be a minimum of 2.2m. This should be confirmed for this space.

Loading/servicing

- The Traffic report attaches a letter from a waste service provider confirming that their rear-loading vehicle is 6.4m in length and 2.2m in height. A dimension diagram attached to that letter shows an overhead clearance of 2.08m. The traffic report also advises that it requires an overhead clearance of 2.08m. As noted in the original Traffic Referral comments, it is unclear if the rear loading of the vehicle requires an increased overhead clearance beyond the quoted 2.2m. Further information clarifying the clearance height required when bins are emptied into the waste vehicle is required. This must confirm that there is adequate overhead clearance (2.5m) above the loading bay to cater for rear loading.
- Some information regarding future deliveries/loading arrangements, together with details of the delivery arrangements for the proposed development are required. This should include an analysis of future delivery frequency and the suitability of the proposed loading bay to cater for such deliveries including overhead clearance requirements. It is required to demonstrate that the development can operate effectively without any reliance on an on-street loading bay.

Pedestrian through Site Link

- As per the Traffic Referral comments, for the pedestrian through site link, measures to enhance the Shared Zone and cater for pedestrian safety at the junction with Rialto Lane should be considered. The corner splay and the sight line triangle should be plotted and dimensioned on the plans.

The amended plans and traffic report in their current form remain unacceptable given the concerns relating to the adequacy of the off-street parking and internal circulation arrangements. There are also areas where additional information is required to confirm the adequacy of the proposed arrangements.

The proposal therefore remains unsupported.

Comments - 11/11/2022

Proposal description: Demolition of existing structures and construction of a multistorey commercial building at 34 - 35 South Steyne, Manly, including 4 levels of above-ground commercial, a below-ground commercial and a basement carpark.

The traffic team has reviewed the following documents:

- Plans (Master Set) – issue for DA, designed by DURBACH BLOCK JAGGERS, dated 22/06/2022,

- Traffic and Parking Assessment report prepared by Varga Traffic Planning dated 30 June 2022,
- Statement of Environmental Effects prepared by Boston Blyth Fleming Town Planners dated July 2022, and
- Pre-Lodgement Advice (PLM2022/0084) dated 09 June 2022.

It is noted that:

- Vehicular access to the off-street parking facilities is provided via a new combined entry/exit driveway off Rialto Lane.
- Off-street parking for the proposed development is provided for a total of 12 cars, including 2 car share spaces and 5 bicycles in a basement parking area beneath the building.
- Loading and servicing will be undertaken by commercial vehicles up to and including the 6.4m long Waste Wise Mini Garbage Truck with an overhead clearance of 2.08m.
- The applicant's traffic consultant advises that Council's traffic engineer has 'indicated that a reduction of 50% (in DCP parking rates) would be considered acceptable and that car share spaces would be considered equivalent to 5 parking spaces each". This is not the case. The outcome of the discussion was that Council would give consideration to a lower parking rate given the site constraints however anything less than a 50% reduction would be unacceptable. It was acknowledged that Council has accepted a privately operated car share space in lieu of up to 5 car car spaces when assessing some other development application and it was suggested that the use of one or two car share spaces may be a means of reaching that 50% figure. It was NOT suggested that car share spaces could be used to provide even less than 50% of the required parking under the DCP.

There were a number of traffic concerns raised in the Prelodgement meeting (PLM) traffic referral comments dated 9 June 2022 that have not been adequately addressed in the Traffic and Parking Assessment Report.

Parking Requirements and Design

- The parking requirements for the development comprising 199.4m² GFA of Restaurant Serviced Area and 1,386.5m² GFA of commercial premises (a total of 1,585.9m² GFA) are 39.6 parking spaces (rounded up to 40). The development proposes a total of 12 car parking spaces including two (2) carshare parking spaces, and one (1) shared loading/waste/retail parking space. It is noted that the size of the

waste collection vehicle that will service the development is only small and regular servicing will therefore be required. The loading/waste bay cannot be considered a parking space as it will be in regular use for waste collection and deliveries. The development therefore provides only 11 parking spaces and, accordingly, there is a shortfall of 29 parking spaces.

- The use of car share parking on-site was suggested at the PLM meeting as a potential means to offset some of the development's parking requirements. The developer proposes two (2) car share parking spaces, and the developer wishes to consider these spaces the equivalent of five (5) parking spaces each. Upon further reflection, the use of car share spaces at this site is not supported. This part of Manly is well served by car share already as highlighted in the developers traffic report and while commercial tenants of the development are encouraged to sign up for individual or corporate membership of a car share organisation operating in Manly, the dedication of two spaces for car share use is now considered undesirable and unnecessary. The developer may elect to dedicate two of the spaces for pool car use which would make vehicles more accessible for workers in the building but this does not reduce the development's parking requirements.
- While some relaxation of DCP requirements in this location could be considered to reduce traffic levels and to encourage greater use of sustainable transport modes, having regard to the proximity of the site to good public transport, shops and recreational uses and the high level of walking and cycling activity in the vicinity, a 50% reduction in parking requirements is considered the maximum that could be supported.
- Section 4.2.5.4 of Manly DCP gives some exceptions to parking rates/requirements in Manly Town Centre (including commercial premises) where the constraints of the site preclude the provision of some or all of the required parking spaces and where the movement of vehicles to/from the site would cause unacceptable conflict with pedestrian movements. This is not the case at this site as it is not constrained in terms of its ability to provide parking. The removal of the basement commercial floor space would free up space below ground for additional parking/loading areas as well as reducing parking requirements associated with the development.
- The development is not for alterations and additions to an existing building or change of use of an existing structure, and it is not unreasonable to expect that the developer should provide parking
- As outlined at prelodgement stage, there is no longer any capacity to levy contributions for parking from the Manly Section 94 Contributions plan, therefore each DA must now be considered on its merits in terms of the adequacy of parking.
- Any increased parking demand on-street as a result of parking shortfall for this development will exacerbate existing high levels of parking congestion in the Manly Town Centre.
- The driveway at the property line is measured to be approximately 6.1 metres wide, reducing to about 4.4 meters wide inside the property on the ramp. No plots for access to and from the development have been provided. As also outlined in the PLM referral, a swept path plot must be provided for B99 vehicles entering/exiting the site from Rialto Lane and then entering/exiting the carpark ramp. Noting that this must be based upon entry via eastbound travel on Rialto Lane past a parked truck

within the Loading Bay on the north side of Rialto Lane. Entry from the south is not permissible under existing travel flow arrangements in Rialto Lane.

- The ramp and the carpark circulation roadway are single-width. There will therefore be no capacity for vehicles to pass on the ramp and through the circulation roadway. A waiting bay inside the carpark and a signal system to manage ingress/egress movements should be included in the amended plans. Passing opportunities for vehicles passing in opposing directions within the carpark are to be available and shall be demonstrated by swept path plots for a B99 passing a B85 vehicle.
- A vertical clearance test has been shown for the Waste Collection vehicle, which shows that this vehicle can negotiate the driveway. A vertical clearance assessment on the driveway ramps should be undertaken, using traffic engineering software such as Autotrack/Autoturn, for a B99 car entering and accessing the carpark to show any scraping and bottoming.

Loading/servicing

- Provision has been made for an off-street loading bay to cater for deliveries to the proposed commercial/ retail premises. The loading bay length is measured approx. 5.4m which is not sufficient length to accommodate a 6.4m SRV. The traffic report attaches a letter from a waste service provider confirming that their rear loading vehicle is 6.4m in length and 2.2m in height. The traffic report however advises that it requires an overhead clearance of 2.08m. The letter also advises that a dimension diagram is attached but this has not been provided to Council. There is a lack of clarity regarding the required dimensions for the waste service. In particular it is unclear if the rear loading of vehicle requires an increased overhead clearance beyond the quoted 2.2m. Further information clarifying the space requirements and in particular enclosing the dimension diagram is required to verify that the loading bay is appropriately sized and that the 2.5m overhead clearance above the loading bay is adequate.
- As noted in the PLM referral, the shared use of a parking bay/loading bay is not supported given that access for loading/waste collection is not feasible if the parking bay is occupied and noting the frequent waste collection regime that will be required as a result of the limited capacity of the vehicle. The parking bay should be reallocated a Loading Bay.
- It is reported in the traffic report that loading/servicing for the proposed development is expected to be undertaken by a variety of light commercial vehicles and small to medium-sized trucks up to and including the 6.4m long Waste Wise Mini Garbage Truck. Council requires clarification on the intended loading/unloading arrangements that will apply noting that the loading bay and overhead clearance is unsuitable for servicing by most small trucks and by no medium sized trucks. Some information regarding future deliveries/loading arrangements, together with details of the delivery arrangements for the proposed development are required. This should include an analysis of future delivery frequency and the suitability of the proposed loading bay to cater for such deliveries. It is required to demonstrate that the

development can operate effectively without any reliance on an on-street loading bay. The loading bay should be plotted to conform with the dimensions of the largest vehicle anticipated to require access the site. Use of Loading Zones in Rialto Lane which are already overused is not appropriate

- As noted in the PLM comments, the bin store room is not located adjacent to the waste collection bay and requires waste collection staff to transport bins through the circulation area to reach the waste collection vehicle. This is unsafe and impractical.

Pedestrian through Site Link

- As per the PLM referral comment, for the pedestrian through site link:
 - o measures to enhance the Shared Zone and cater for pedestrian safety at the junction with Rialto Lane should be considered eg. Contrasting paving, warning signage and markings.
 - o For compliance with AS2890.1 clause 3.2.4 (b), the corner splay at the point where the pedestrian through sight link meets Rialto Lane should be 2.5m x 2.0m which will allow for visibility to/from pedestrians exiting the through site link onto Rialto Lane. The sight line triangle should be plotted and dimensioned on the plans

The plans and the traffic report in their current form are unacceptable due to the inadequacy of the provided information as outlined above.

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.