

Traffic Engineer Referral Response

Application Number:	DA2023/0951
Proposed Development:	Alterations and additions to the Royal Motor Club Broken Bay
Date:	23/02/2024
Responsible Officer	
Land to be developed (Address):	Lot 5 DP 4689 , 46 Prince Alfred Parade NEWPORT NSW 2106 Lot 6 DP 110670 , 46 Prince Alfred Parade NEWPORT NSW 2106 Lot 262 DP 752046 , 46 Prince Alfred Parade NEWPORT NSW 2106 Lot 329 DP 824292 , 46 Prince Alfred Parade NEWPORT NSW 2106

Officer comments

Further comments - February 2024

- It is noted that the applicant has provided responses to the council's initial comments. However, no additional work has been done in order to address those concerns, other than disputing the validity of the requests for additional information.
- It is noted that the response letter states a decline in membership, however the expansions works are obviously not being undertaken to cater for a reduced number of members but to attract new members. It is also obviously not the case that the only users of the club are members. As with any club non-member visitors make up a significant proportion of those who utilise the club facilities particularly for large events such as weddings when parking pressures would tend to be most pronounced. The reporting to date has provided insufficient information for Council to determine if the existing 282 parking spaces are adequate and in particular if there will be adequate parking to cater for non-member visitors or indeed for members who are not boat owners.
- A site inspection carried out by Council's traffic engineer at 2:00pm on Thursday 22 February (not anticipated to be a busy time at the club) found almost 100% occupancy of parking in the upper levels of carparking (referred to as zones A & B in the developers parking occupancy surveys). It was also observed that several vehicles were parking in areas not designated for parking which impeded circulation and suggests that drivers of those vehicles had been unable to find parking elsewhere. By contrast parking in the lower levels of the carpark was less well utilised however the presence of boom gates and signage advising "Boat Owner members please wait here for green signal to access lower carpark" suggests that the lower levels of the carpark are not available for access by non boat owner members or by visitors to the club. This requires clarification and if this is the case, it may be the case that opening up parking in this area for non-boat owner members and visitors may be sufficient to address the parking issues.
- It is noted that the response letter mentions the parking surveys undertaken on 6th and 8th of January are consistent with industry requirements to capture RMYC's parking demands during its peak trading period. The surveys were undertaken between 12pm and 4pm. Council

believes that these surveys, undertaken only during the day time, and only over two days are inadequate to gauge the parking impacts at peak times. In particular the absence of data for the early evening period, the absence of data captured during an event at the club and the absence of data obtained on a Saturday are notable omissions from the collected data. The data provided from 2016 is considered to old to be relevant now and is also considered inadequate as it does not differentiate between parking occupancy rates in the upper and lower carpark areas which appears to be a critical issue. It is noted that advice given at the Prelodgement meeting relating to this development application was that "Parking occupancy surveys undertaken over several weekends at peak times (Spring/Summer weekend afternoons/early evening) should be used to determine existing average maximum parking levels on site with those parking demands adjusted to reflect increased demands generated by the proposed new or expanded facilities." The applicant appears to have chosen to disregard this advice.

- With regard to the referral comment requesting details on the loading/servicing arrangements. The applicant advises that these will be unchanged. There are no dedicated loading/servicing bays on site at present with deliveries appearing to be accommodated by parking in a vehicle circulation area blocking access to a boat ramp. With the expansion of dining and social areas it is expected that there will be an increased demand for deliveries. Information on the size of delivery/servicing vehicles, their frequency and the location and size of dedicated loading/servicing bays is required. Swept path plots demonstrating how the largest anticipated delivery vehicle can circulate through the site in a forwards direction are required.
- Given the above, the proposal remains unsupported.

Original Comments - dated January 2024

Proposal description: Alterations & Additions to Existing Yacht Building at 46 Princes Alfred Parade, Newport

The traffic team has reviewed the following documents:

- Plans (Master Set) – Revision D, designed by MCHP Architects, dated 28/03/2023,
- Traffic Impact Assessment, prepared by Traffix, dated 01/02/2023 (Reference No. 22.628r01v01),
- The *Statement of Environmental Effects* prepared by Planning Ingenuity (Reference No. M220260).

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 attract greater levels of patronage from the existing membership and their guests and on-site parking capacity must be demonstrated to be adequate. The existing parking 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 eg 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.
- 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 yacht 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. 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 1,010 m² (page 10), whereas the Statement of Environmental Effects report mentions an additional GFA of 773 m² (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 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 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 and the information in the parking surveys, the complete picture has not been revealed. Visitors to the club experience difficulty 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-the-less considered likely that the development will increase competition for parking and exacerbate on-street illegal parking problems.
- The traffic report presents 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 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 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.

- 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.
- 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.
- Motorcycle parking must be provided at a rate of 1 space per 100 motor vehicle spaces in accordance with the Pittwater DCP.
- 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.
- The issue of illegal parking activity at kerbside on Prince Alfred Parade has not been 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

Loading/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.
- 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.

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

Conclusion

The application is not supported at this stage with further information as outlined above required prior to further consideration of the proposal.

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.