

Traffic Engineer Referral Response

Application Number:	DA2021/1094
Date:	13/10/2021
Responsible Officer	
Land to be developed (Address):	Lot 4 DP 38041 , 7 Hayes Street BALGOWLAH NSW 2093

Officer comments

Proposal description: Change of use to specialised retail premises and update façade and amenities

The site is currently occupied by a two-storey industrial building comprising a cumulative floor area of 529.5m² and was previously approved to operate with two (2) off-street car spaces in a DA consent dated back in 1964.

The proposed development involves alterations and additions to the existing industrial building to facilitate its conversion to specialised retail premises (primarily for bulky goods sales) comprising a cumulative floor area of 453.5m².

Off-street parking is provided for a total of 3 cars in the front setback of the site. All car spaces will be directly accessed off Hayes Street consistent with existing arrangements.

Loading / servicing for the proposed development is proposed to be undertaken by a variety of light commercial vehicles up to and including 6.4m long Small Rigid Vehicles (SRV trucks), with a travel/height clearance limit of 2.8m. Vehicular access to the loading facilities is provided via a separate service driveway directly off Hayes Street.

The development is located within the Enterprise Corridor (B6) Land Use Zoning of Northern Beaches LGA based on *Manly Local Environmental Plan 2013 Maps*. *Manly DCP* applies to the subject site.

The *Traffic and Parking Assessment* prepared by Vagra Traffic Planning dated 1 July 2021 and the plans designed by MSK Architects dated 24 June 2021 have been reviewed by the Traffic team.

Parking requirement

- The development cumulative floor area of 453.5m² has been reported in the traffic report; however, the first page of the architectural plans show the proposed GFA is 503.53m². It is unclear which GFA is the final one, and this should be clarified.
- In terms of parking, as the development is primarily for bulky goods sales, under the DCP, parking should be provided at a rate of 1 space per 50sqm of GFA. The application of this rate to the proposed 453.5m² GFA results in nine (9) spaces. The development proposes three (3) vehicle parking spaces plus a loading bay. Offstreet parking spaces are proposed on the concrete "threshold" area in front of the building on its western side.
- A deficiency of six (6) car spaces is proposed. Parking in accordance with DCP requirements should be provided however as the development is for the reuse of an existing building, so some relaxation of requirements (approximately 3-4 spaces) could be considered. Therefore, the current parking shortfall is considered excessive given the following reasons:
 - The development will intensify the demand for parking on-street or in nearby off-street carparks whose parking has not been provided to support parking demands generated by neighbouring developments. Reliance on the public parking spaces on the adjoining road network to cater for the shortfall is not supported.
 - The surrounding area already experiences high demand for parking, and there is unlikely to be sufficient spare capacity in the network to provide safe and convenient parking.
 - Adjoining parking areas on private land (specifically the adjoining Woolworths carpark opposite the site) are not to be relied upon as these are provided to support existing uses and already experience high levels of demand.
 - Converting an older industrial/warehouse type premises for a use that has a higher traffic generation is often problematic; however, Council needs to balance the need for re-use of existing sites with the impacts of such re-use in terms of intensifying parking demands by permitting uses that have insufficient on-site parking.
 - The existing provision of car parking of 2 spaces was approved for industrial type activities and at a time when parking demands on-street were less intense. The existing use also has a much lower traffic generation rate than retail / bulky goods type activities. It must be noted that these spaces were partially approved on Council's road reserve, inconsistent with the modern practice of ensuring that all parking for the land use is provided on the site only.

Consideration should be given to the possibility of consolidating with adjoining property owners to ensure that sufficient on-site parking is provided for the proposed conversion of the existing building to a retail use.

- Parking space dimensions described on page 16 of the traffic report indicate that they comply with Australian Standard requirements; however, the parking spaces have not been dimensioned on the architectural plans and have not been labelled as staff/visitor parking spaces. The car parking spaces on the amended plans should be dimensioned /labelled and swept path plots should be included to demonstrate that entry and exit from all parking spaces to and from the street is possible.
- The proposed loading bay is undersized. It is considered that a bulky goods use must, as a minimum have a loading bay capable of accommodating a Small Rigid Vehicle (SRV). The loading bay therefore needs to have minimum dimensions of 3.5m wide, 6.4m long. As plotted, the loading bay is too small in terms of width and clearance, and the opening is too narrow to allow access. This would tend to result in deliveries being undertaken either from on-street or on the footpath neither of which is desirable with the latter being illegal. A compliant loading bay capable of accommodating at least an SRV should be provided. If this is not possible, alternative options to cater for deliveries should be outlined and the loading bay reallocated as a car parking. There may be potential for 2 stacked parking spaces for staff use to be provided

within the space occupied by the loading bay with an on-street Loading Zone created between the two driveways, this may require some adjustment to driveway dimensions to accommodate a SRV between them. The above changes would result in 5 offstreet parking spaces, which would be acceptable plus an on-street Loading Zone.

Traffic Impact

- It is reported in the Traffic report that neither the RMS Guidelines nor the Technical Direction nominates a traffic generation rate for specialised retail premises. The traffic generation rate for bulky goods retail stores (PM: 2.7 peak hour vehicle trips per 100m² GFA) was adopted in the traffic assessment and indicates a Net peak period increase in traffic generation of 7vph which is negligible in terms of road network impacts
- It is unlikely that the development would generate significant traffic levels and the development is not opposed on the basis of traffic generation.

Conclusion

Council does not support the proposal for the following reasons:

- There would be inadequate on-site parking provided to accommodate the change in land use.
- The loading dock is insufficiently sized to comply with contemporary standards for loading and unloading purposes and inadequate to support a bulky goods retail use.

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.