

12th March 2021

**Attention: Mr Phil Lane, Principal Planner
Northern Beaches Council**

Dear Mr Lane,

I am writing a further submission in relation to DA2020/1097 following the release of the **Traffic and Parking Impact Statement provided by Transport and Traffic Planning Associates.**

I would appreciate if you could please ensure that the Northern Beaches Local Planning Panel read this submission when considering the Traffic and Parking Impact Statement

I have identified a number of serious concerns relating to this report and I have addressed each of these concerns below.

Road network

Page four of the report states:

“Campbell Parade in the vicinity of the site has one traffic lane in each direction. Unrestricted kerbside parking is generally permitted on both sides of the road”.

- This is statement is incorrect. The kerbside parking along Campbell Parade is restricted between 7am-9am and from 3pm-4pm during school days.

Traffic conditions

Page five of the report states:

“Traffic flow along Campbell Parade at the site frontage indicated relatively free-flowing conditions even during the sportsground peak periods on Friday’s evening (between 4.30pm and 5.30pm) and weekend between 1pm and 12pm and between 2pm and 3pm), being largely limited to local residential and industrial access movements outside of the school’s peak periods”.

- The report does not make clear on what basis it determined that these discrete periods of time were ‘peak periods’. Perhaps this is because the DA does not argue any clear rationale for the need to increase use of the oval after dark, nor has it provided an annual schedule of the current use of the oval.
- The use of the oval fluctuates from week-to-week as well as seasonally. Currently the oval is used on a weekend for cricket. Given that there are only two cricket pitches on the

oval (not three as is the case with soccer pitches) and the length of a cricket game being longer than soccer games, summer sees significantly less activity than during the winter soccer season where there are back-to-back soccer games. It is therefore incorrect to state that any recent monitoring would represent 'peak use' of the oval.

- The reference to a Friday evening (between 4.30pm and 5.30pm) representing a 'peak period' is interesting given that at 5.02pm on Friday 12th March there was not a single person utilising the oval. The Below photograph provides evidence of this and is date and time stamped.



Above photograph of Passmore Reserve during the reported "peak period" use – Friday afternoon between 4.30pm to 5.30pm. Not a single person utilising the oval. It was during this time that observations about traffic flow and safety issues were reportedly monitored.

- The report does not include any information on the date or dates that observations were performed or what method of analysis was used.
- There is no information relating to the actual number of vehicles that travelled along Campbell Pde or surrounding streets during the assessment period or reported periods of monitoring.

- The report does not include any photographic evidence supporting reported observations of “relatively free flowing traffic”. If the traffic was indeed “relatively free flowing” perhaps this because no sporting teams appear to be utilising the oval on Friday afternoons during the period of observation.
- The report does not provide any information on the average speed at which vehicles were travelling.
- The report does not comment on the fact that there is a cycle lane running parallel to Campbell Pde. This is a popular cycle lane that is a link between Manly Dam and Manly Beach.
- The report does not acknowledge that there is a pedestrian crossing approximately 10 meters from a corner, which has safety implications due to cars turning into a pedestrian crossing.

Traffic impact

Page seven of the report states:

“It is noted that the proposed lighting will not increase the capacity nor the intensity of use in terms of patronage of the existing sportsground”

- As outlined in my submission on the 15th December 2020, the claim that there will not be an increased patronage of the use of the oval is difficult to believe. This is because (a) the development proposal has not included any data on the ovals actual current level of use and (b) there have been nil detailed submissions from sporting clubs that currently use the oval about how their current teams would increase the use of the oval.

Given that there are clear concerns that about the ‘assumptions’ that the traffic report was based on, it follows that there are to be concerns about the validity and reliability of the report itself.

Parking

Page nine of the report states:

“The existing on-street parking spaces were surveyed on Wednesday, 17 February 2012, between 2.30pm and 7.30pm”.

- The report appears to have used survey data dating back to 2012, some nine years ago. If this is correct, one would think this data would not be a reliable estimation of current use.
- The above concerns relating to the assumptions on which this report was based is also relevant to parking. If one is to believe that there will be no increase in the number of patrons using the oval then it is arguable that a parking report is not necessary. If one is to conclude there will be a likely increase in patrons or a potential increase in

patrons, then the current report does not provide any comment on the potential impact of this.

- The below photo was taken on Friday 12th March at 5.04pm – the same time that the above photo was taken when the oval was not being utilised by any sporting teams. The photograph reveals that the vast majority of the car parks occupied despite not a single person utilising the oval. How are these parking bays to accommodate players, officials and spectators utilising the three football fields when the oval is actually being utilised?



The above photograph of car parks next to Passmore Reserve was taken during the reported “peak period use”. Note that there are very few available car spaces. Not a single person utilising the oval.

Summary

In summary, I strongly object to DA2020/1097 and have serious concerns about the validity and reliability of the Traffic and Parking Impact Statement provided by Transport and Traffic Planning Associates. These concerns are based on (a) lack of data in the report to justify claims; (b) lack of transparency around what data collection methods were reportedly utilised; (c) the unjustified assumptions the report is based upon; (d) the gaps in the report relating to important issues such as vehicle usage and vehicle speeds; and (e) inconsistencies between what the report suggests are “peak periods” of use and actual observations of use supported by photographic evidence above.

This is a serious matter than impacts on hundreds of residents living in Campbell Pde, employees working at the industrial state at the end of Campbell Pde, and the hundreds of students who attend Mackellar Girls High School.

Thank you for your consideration.

Justin Doran
Resident of Campbell Pde
Manly Vale