

Traffic Engineer Referral Response

Application Number:	DA2024/0044
Proposed Development:	Demolition works and construction of Seniors Housing with basement parking
Date:	13/11/2024
Responsible Officer	
Land to be developed (Address):	Lot 11 DP 12435 , 27 Kevin Avenue AVALON BEACH NSW 2107 Lot 10 DP 12435 , 25 Kevin Avenue AVALON BEACH NSW 2107

Officer comments

Further Comments - dated 13/11/2024

- It is noted that an amended master set has been provided dated 25/06/2024, followed by amended traffic report dated 28th June 2024, footpath access plan dated 25/06/2024 and amended access report dated 24th September 2024.
- It is noted that the basement layout has been redesigned to provide a total of 16 car parking spaces including 10 accessible parking spaces and 1 car wash bay. The proposed 16 car parking spaces do not satisfy the car parking requirements of minimum 18 spaces as per DCP and SEPP as SEPP requires a minimum of 14 resident parking spaces and DCP requires a minimum of 4 visitor parking spaces, including one accessible parking space for visitors and a car wash bay for residents. Hence, the proposed layout results in a shortfall of 2 car parking spaces which have not been justified in the amended traffic report. For more details on car parking requirements, please refer to the original traffic comments dated 16th May 2024.
- It is noted that the amended proposal provides 10 accessible parking spaces with a shared zone. However, some of the accessible parking spaces which are provided within the double garage have door running through the shared zone, which results in obstructed access for wheelchairs. The door which is blocking shared zone must be removed and a bollard must be placed in the shared zone to prevent parking on the shared zone.
- It is noted that the amended traffic report has provided a swept path analysis for car wash bay as requested in the original comments, however other requested swept paths are still missing. Other swept paths like B85 passing B99 on the driveway and access ramp must be provided. Also, the ramp leading to further parking spaces (no. 9 to 16) is a single ramp. Hence, it must be demonstrated with swept path that where a vehicle would prop to give way to entering vehicle and the entering vehicle can go around the propped vehicle. The waiting bay must be marked and convex mirror must be shown on the plans.
- It is noted that a footpath access plan has been provided to show a continuous path of travel from the site to bus stops on Barrenjoey Rd (south of Central Rd) using existing and proposed footpaths. This plan is similar to the plan provided to Council on 28th June and 26th August, where Council's traffic engineer has already provided comments. Although with some modifications, this plan is still unacceptable because of following reasons:
- The proposed plan exceeds the requirement of path of travel of minimum 400m as per SEPP to both the bus stops.

- The proposed plan includes crossing Kevin Avenue, north of Park Avenue at an unsafe location where sight lines are obscured by the crest.
- The proposed plan includes lots of relocation of signs but have not clearly shown where they will be relocated to.
- The plan shows a relocation of telstra pit, but there are no details supporting this relocation. Council believes that the applicant needs an approval from the Telstra before proposing a relocation.
- The proposed footpath works appear to partially encroach within the boundaries of no. 701-703, which cannot be accepted unless the developer purchases the strip of land from the property owner of no. 701-703. The amended survey still dated as 2019 and showing lawn instead of footpath outside no. 701-703, shows an incorrect boundary line of no. 701-703.
- The proposed kerb ramp at the intersection of Central Road and Barrenjoey Rd includes modifications to existing stormwater kerb inlet. However, there are no detailed design provided for this modification. Since the proposed work on existing intel is the matter for Council's Development Engineering or stormwater engineering team, the traffic team does not provide any comments on it but relies on the other teams for the assessment of proposed modifications.

Given the number of issues outlined above, the DA remains unsupported.

Original Comments - dated 16/05/2024

Proposal Description: Proposed Seniors Housing at 25-27 Kevin Avenue, Avalon Beach

The Traffic Team has reviewed the following documents:

- Plans (Master Set) - revision A, prepared by Gartner Trovato Architects, dated 23/10/2023
- Traffic and Parking Assessment Report (ref:23029), prepared by Terrafric Pty Ltd, dated 19th September 2023
- Footpath Survey (ref: 21372), prepared by Bee & Lethbridge, dated August 2019
- Access Report, prepared by Accessibility Solutions dated 7th December 2023
- The Statement of Environmental Effects, prepared by BBF Townplanners, dated November 2023
- Pre-Lodgement Advice (PLM2023/0046) dated 11 May 2023

Comments

- The architectural plans and SEE report show that there are 8 x 3-bed and 2x 2-bed self-care housing units resulting in a total of 28 bedrooms. However, the traffic report mentions there are 10 x 3-bed units resulting in a total of 30 bedrooms and carries out the car parking requirements based on 30 beds. The traffic report must be updated to be consistent with the architectural plans and SEE report.
- The basement carpark is reported to provide for 21 car parking spaces however, as discussed below, given the way the carpark is currently designed it can not be considered to provide any more than 12 car parking spaces, however could be adapted to provide more. This is discussed further below.

Property Access

- The vehicle access is provided from Kevin Avenue. The traffic report on page 7 states that “The two-way accessway has a minimum width of 6.1m comprising a 5.5m wide roadway and 2 x 300mm wide kerbs”. However, these dimensions are not annotated on the plans. Hence, the width of driveway and carpark access ramp must be shown on the plans.
- The traffic report has not provided any swept path analysis. A swept path analysis must be provided to demonstrate a passing of a B85 and B99 vehicle on the driveway and access ramp in compliance with AS/NZS2890.1 Clause 2.5.2 (c). Also, swept path analysis must be provided to demonstrate access to critical spaces such as the car wash bay.

Parking

- According to the clause 108(k) of SEPP Housing 2021, the non-discretionary parking requirement for independent living units is a minimum of 0.5 spaces per bedroom. Therefore, the proposed development is required to provide a minimum of 14 car parking spaces for the proposed 28 bedrooms. It is proposed that the development will provide 20 residential car parking spaces which would comfortably exceed the minimum requirement of 14 spaces. However, as the plans show 10 of the spaces as being accessible, for compliance with AS2890.6 these spaces would need to be at least 2.4m in width with a 2.4m min hatched shared space adjacent. It is not therefore appropriate for all of these spaces to be shown on the plans as being accessible, merely that they be demonstrated to be capable of conversion to accessible spaces in compliance with SEPP Housing schedule 4 Part 1 clause 4(2).
- It is noted that all the ten units are provided with a marked accessible parking space, nine of these inside a double garage with an adjacent regular parking space. According to AS2890.6, an accessible parking space is to be 2.4m wide by 5.4m long with a hatched shared zone of same dimensions. The shared zone is to have a bollard to prevent it from being used as a parking space. The proposed accessible parking spaces do not comply with AS 2890.6 as they do not have a marked shared zone with hatching. Moreover, if the adjacent spaces are marked as shared zone, the total number of car parking spaces will be reduced to 12 spaces only and this number will not satisfy the car parking requirement. It is noted that SEPP Housing Schedule 4, Part 1 clause 4(5) does not require the international symbol for disabled access to be provided at the spaces however clause 4 (2)(c) requires that a minimum of 15% of the parking spaces comply with AS 2890.6 with 50% being either compliant or at least 3.2m in width and having a level surface with a maximum gradient of 1:40 in any direction. The developer therefore needs to adjust the parking area plans to nominate which spaces are the designated compliant accessible parking spaces and adjust the parking numbers to reflect SEPP requirements. Also, a minimum of 2.5m headroom clearance must be provided at accessible spaces in compliance with AS2890.6. The traffic report must be updated to confirm that the minimum 2.5m headroom clearance at accessible parking spaces is available. At present the traffic report only states min 2.2m headroom clearance throughout the basement (page 7).
- SEPP Housing 2021 does not provide guidance in terms of the number of visitor parking spaces but does note in Schedule 4, Part 1 clause 4(4) that at least 5% of any visitor parking must comply with AS/NZS2890.6. The provision of visitor parking is therefore assumed and for a housing development there will clearly be a need for visitor parking in addition to the residential parking requirements. As the SEPP does not detail a visitor parking requirement, the Pittwater DCP has been referenced and requires visitor parking to be provided at a rate of 1 space for every 3 dwellings (rounded up), which means a minimum of 4 visitor spaces are required for the proposed ten dwellings of which at least one must be accessible (for compliance with SEPP Housing Schedule 4, Part1 clause 4(4)). The single proposed visitor parking space does not satisfy this requirement. Furthermore, the present location of the

visitor/car wash bay looks inaccessible due to less manoeuvring area. Hence, a swept path for the B85 vehicle ingressing and egressing this space must be provided.

- Dimensions of car parking spaces must also be shown on the plans.

Access to Transport

- It is noted that an access report has been provided for the proposed development, the access report provides two options for footpath access to bus stops, to shops and services to demonstrate compliance with SEPP Housing clause 93. Option A refers to minor works to add drainage grates to bridge the gutter to enable the wheelchair access and construction of a new footpath to connect with an existing footpath adjacent to a recently completed seniors housing development. However, no further details have been provided on the proposed connection over the speed hump and grades along the existing and proposed footpaths. Council does not believe it is appropriate to rely upon crossing over the speed hump unless it is formally upgraded to a raised marked pedestrian crossing. Unless this is done, such use would be contrary to the Austroads Guide to Traffic Management Part 8 which recommends physical barriers be provided to prevent use of flat topped speed humps as pedestrian crossings unless they are approved and marked as a pedestrian crossing. Also, it is understood that the applicant is relying on the new footpath built outside No.701-703 Barrenjoey Road to be used by the people in wheelchairs, however, no grades on this section have been checked. Council has concerns that this section has steeper grades and would not be suitable for use by wheelchairs. The Seniors housing development at No. 701-703, has provided a widened footpath, but relies upon an accessible path of travel located within the property boundary and the publicly accessible footpath has not been reviewed in terms of its acceptability under the current SEPP. Hence, Council requests the applicant to revise their access report and provide advice on the footpath and ramp grades and crossfalls, both proposed and existing, that the application relies upon.
- It is noted that the footpath survey has been provided. However, the survey is dated 2019 and still shows nature strip in the place of recently constructed footpath outside the recently constructed SEPP Housing at No. 701-703. Council requires up to date survey information with footpath gradient details plotted throughout the travel routes for pedestrian access to the bus stops. Furthermore, Council has concerns with regard to the existing widths of existing footpaths along Kevin Avenue for use by wheelchairs or mobility scooters. The widths must be checked and confirmed on the plans and if inadequate widened to min 1.5m to comply with Council's current footpath standard. A detailed plan showing widened footpath with levels and gradients throughout the path of travel must be provided.
- The proposed route called option B in the access report proposes an access route to bus stops that is within 400m of the development as required by the SEPP but relies upon access through a drainage reserve and Right of Way between No.s 22 and No. 24 Kevin Avenue. This grassed and treelined strip of land currently has no footpath however it is considered unlikely that that a compliant footpath could be constructed along this strip of land as the grades appear to be in excess of the required 1 in 14. The Option B route also relies upon use of the bus stop on the eastern side of Barrenjoey Road near Wollstonecraft Avenue. Sealed and appropriately graded access to that bus stop does not appear to be available as the bus stop is at a different level to the adjacent footpath. Any person in a wheelchair or motorised scooter travelling on this footpath would not be able to reach the bus stop without travelling over the driveway and grassed nature strip or onto the road. Option B is unlikely to be an acceptable route option.

Sight lines

- The adequacy of sight lines to pedestrians and vehicular traffic at the point where the driveway exits the property have not been demonstrated. This is required for compliance with AS2890.1

clause 3.2.4.

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:

CONDITIONS TO BE SATISFIED PRIOR TO THE ISSUE OF THE CONSTRUCTION CERTIFICATE

Vehicular Swept Paths

Vehicular manoeuvring paths must be provided to demonstrate all vehicles can enter or depart the site in a forward direction without encroaching on required car parking spaces. The drawings must be compliant with Australian/New Zealand Standard AS/NZS 2890.1:2004 - Parking facilities - Off-street car parking.

Details demonstrating compliance with this condition must be submitted to the Principal Certifier prior to the issue of the construction Certificate.

Reason: To ensure compliance with Australian Standards relating to manoeuvring, access and parking of vehicles.

Vehicle Access & Parking

All internal driveways, vehicle turning areas, garages and vehicle parking space/ loading bay dimensions must be designed and constructed to comply with the relevant section of AS 2890 (Off-street Parking standards).

With respect to this, the following revision(s) must be undertaken;

All internal driveways and vehicle access ramps must have ramp grades and transitions complying with AS 2890.1. To ensure the gradient requirements and height clearances are satisfied, a driveway profile must be prepared for all internal ramps showing ramp lengths, grades, surface RL's and overhead clearances, taken from the crest of the ramp to the base. The driveway profile must be taken along the steepest grade of travel or sections having significant changes in grades, where scraping or height restrictions could potentially occur and is to demonstrate compliance with AS 2890 for the respective type of vehicle.

Plans prepared by a suitably qualified Engineer shall be submitted to the Principal Certifier prior to the issue of a Construction Certificate.

Reason: To ensure compliance with Australian Standards relating to manoeuvring, access and parking of vehicles.

Vehicle Access & Parking

All internal driveways, vehicle turning areas, garages and vehicle parking space/ loading bay dimensions must be designed and constructed to comply with the relevant section of AS 2890 (Off-

street Parking standards).

With respect to this, the following revision(s) must be undertaken to the parking allocation:

- XX residential spaces
- XX residential visitor spaces
- XX retail spaces
- XX community facility spaces
- XX car share spaces
- XX car wash bays
- XX motorcycle spaces
- XX residential visitor spaces must be line marked as "Residential Visitor Only".

These amendment(s) must be clearly marked on the plans submitted to the Principal Certifier prior to the issue of a Construction Certificate.

Reason: To ensure compliance with Australian Standards relating to manoeuvring, access and parking of vehicle.

CONDITIONS WHICH MUST BE COMPLIED WITH PRIOR TO THE ISSUE OF THE OCCUPATION CERTIFICATE

Operational Management Plan

An Operational Management Plan (OMP) is required to be prepared and submitted to Council detailing the operation of the development. The OMP shall include, but not be limited to the following:

- Vehicle access and egress.
- Through-site circulation of vehicle movements.
- Management of car parking areas.
- The location and content of directional signage.
- Complaints management.
- Noise management.
- Truck delivery times and methods of control to manage the sequencing of the loading docks.
- Waste management.

Details demonstrating compliance are to be submitted to the Principal Certifier prior to the issue of any Occupation Certificate.

Reason: To ensure that the development operates with minimum disruption to the surrounding area.

ON-GOING CONDITIONS THAT MUST BE COMPLIED WITH AT ALL TIMES

Site Occupancy

That the number of (customers/visitors/patients/guests/patrons) on the site at any one time be limited to X.

Reason: To ensure that all parking generated by the site is contained on the site.