

Traffic Engineer Referral Response

Application Number:	DA2023/0987
Proposed Development:	Demolition and construction of a shop top housing development with basement parking
Date:	29/04/2024
Responsible Officer	
Land to be developed (Address):	Lot 1 SP 14133 , 39 Belgrave Street MANLY NSW 2095 Lot 2 SP 14133 , 38 Belgrave Street MANLY NSW 2095 Lot 3 SP 14133 , 36 Belgrave Street MANLY NSW 2095 Lot 4 SP 14133 , 35 Belgrave Street MANLY NSW 2095 Lot 5 SP 14133 , 1 / 37 Belgrave Street MANLY NSW 2095 Lot 6 SP 14133 , 2 / 37 Belgrave Street MANLY NSW 2095 Lot 7 SP 14133 , 3 / 37 Belgrave Street MANLY NSW 2095 Lot 1 DP 100633 , 40 Belgrave Street MANLY NSW 2095 Lot 1 DP 104766 , 41 Belgrave Street MANLY NSW 2095 Lot 1 DP 34395 , 42 Belgrave Street MANLY NSW 2095 Lot 1 DP 719821 , 43 Belgrave Street MANLY NSW 2095 Lot CP SP 14133 , 35 - 39 Belgrave Street MANLY NSW 2095

Officer comments

Comments dated 29/04/2024

There were a number of traffic concerns raised in the traffic comments dated 08/04/2024. The comments were mainly related to the proposed retail/commercial off-street car parking requirement, proposed bicycle parking spaces, and the loading bay. The concerns have been discussed at the Section 34 Conference held on Thursday 11 April 2024 and they have been addressed in the Traffic Impact Assessment (TIA) Report prepared by JMT Consulting dated 23 April 2024, and the plans prepared by SJB Architects dated 22/04/2024.

Subject to conditions, the application can be supported on traffic grounds.

The proposal is therefore supported.

Comments dated 08/04/2024 (sent via email)

Some of the amendments/further information include:

- The retail component in the modified plans has been reduced from 447 m² in the original proposal to 423 m², resulting in a parking requirement of 11 retail spaces.
- A modified off-street parking plan should be submitted to the Council. The updated Traffic report indicates that the new plans include a total of 47 parking spaces, including 35 designated for residential use, 4 for visitors, 7 for retail, and 1 for car share. This represents an increase from the previous plan, which had 35 residential spaces, 4 visitor spaces, 6 retail spaces, and 0 car share spaces. The proposed modification therefore includes a deficiency of five (5) retail car spaces.
- One (1) car share parking space is proposed, and it is reported in the amended Traffic report that the use of car share space is assumed to be equivalent to between three (3) to five (5) parking spaces. The Traffic report also refers to previously approved DA2021/0179 (construction of a 39-room boarding house), where three car share spaces were agreed to replace the need to provide 15 standard parking spaces. This is not considered a conservative approach, and the shortfall of retail parking spaces is not considered acceptable given that:
 - 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 retail 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 the approval of a lower level of parking than DCP rates would be given, in view of the site constraints and that the development is for the reuse of an existing building, it was not envisaged that anything more than a 3-space reduction in the required parking would be supportable.
 - the amended traffic report states that the car share space will be made available for residents/visitors and retail/commercial users. The report justifies this by explaining that parking for retail uses is busiest during the day on weekends, while residential visitor parking demand is highest during the evenings on weekdays and weekends. However, this means that the spaces may often be in use by residents/visitors, making them unsuitable for retail use when they are needed.
 - While the use of car share parking on-site was supported in some development applications to offset some of the development's parking requirements, such arguments would be more appropriately applied to the residential parking component and are not accepted as a justification for a reduced commercial/retail parking supply.
 - 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 traffic report indicates that each residential apartment will be provided with an enclosed storage area for bicycles. This should be included in the amended Architectural Plans.
- The development does not include an off-street loading facility but will rely on the use of on-street Loading Zones on Belgrave Street and Whistler Street adjacent to the development site. A survey of the existing loading zones near the site has been conducted by the consultant and is included in the amended report. The survey indicates that while the loading zone usage reaches capacity at certain times of the day, there will be enough capacity to accommodate the expected number of deliveries arising from the proposal. The lack of a loading dock is therefore not opposed, noting that the Loading Zone on Belgrave Street and Whistler Street near the development will be retained and available for deliveries. A limitation on the size of vehicles servicing this development is required due to a 6m length restriction on trucks entering Whistler Street from Sydney Road.

- Dimensioned plans, including parking space and ramp widths, must be submitted to the Council prior to the issue of the Construction Certificate.

In summary, the application can be supported on traffic grounds, subject to the applicant changing the shared car-share parking space to a retail parking space. The council is open to approving a lower level of parking than the DCP rates, and a reduction of three (3) spaces in the required parking could be considered acceptable.

Original Comments dated 20/12/2023

Proposal description: Demolition and construction of a shop top housing development with basement parking

The proposed development is for the demolition of the existing structures and construction of a shop top housing comprising 25 residential apartments (15 x two-bedroom, 10 x three-bedroom apartments), 447m² retail premises and basement carpark for 45 vehicles (35 residential, 6 visitor and 4 retail spaces). Vehicle access is provided at Whistler Street.

The traffic team has reviewed the following documents:

- Plans (Master Set) – Job No. 6693, designed by Time & Place, dated 28/06/2022,
- Transport Impact Assessment report, Project Number 2317, prepared by JMT Consulting dated 03 July 2023,
- Statement of Environmental Effects prepared by BBF Town Planners dated July 2023, and
- Pre-Lodgement Advice (PLM2023/0054) dated 13 June 2023.

Parking requirement and design:

- The land is zoned E1 Local Centre under Manly Local Environmental Plan 2013 (LEP).
- Manly DCP applies to the subject site. The parking requirements for the development comprising 25 units (15 two-bedroom units and 10 three-bedroom units) and 447m² retail/commercial premises are 35 resident spaces, 4 visitor spaces, 11.2 retail/commercial users (round up to 12) = 51 spaces. In response, 45 parking spaces have been proposed (35 residential parking spaces, 4 visitor parking spaces and 6 retail parking spaces). There is therefore a shortfall of six (6) retail/commercial parking spaces.
- The shortfall of 6 retail/ commercial parking spaces is not considered acceptable given that:
 - o While some relaxation of DCP requirements in this location could be considered to reduce traffic levels and given 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, such arguments would be more appropriately applied to the residential parking component and is not accepted as a justification for a reduced commercial/retail parking supply.

o Section 4.2.5.4 of Manly DCP gives some exceptions to parking rates/ requirements in Manly Town Centre (including commercial/retail 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 applicable to this site as the site is not constrained in terms of its ability to provide parking. As outlined in the PLM referral comments, the removal of some of the residential units would reduce the parking requirements associated with the development.

o In accordance with the PLM referral comments, a shortfall in retail parking requirements is not considered acceptable i.e retail parking for 12 vehicles is required however consideration could be given to some shortfall in residential parking given the proximity of the development to good public transport, shops and services. It should be noted that any approval for a development in this location will be subject to a condition of consent that parking permits will not be available for residents/tenants of this property to reduce reliance on car travel and promote use of active travel and public transport.

o 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.

o 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 plans show eight (8) accessible parking spaces which is acceptable. The design of the accessible parking spaces appears to be compliant with the Australian Standard AS2890.6:2009 Parking Facilities-Off Street Parking for People with Disability. Bollards have been provided on the plans for the disabled shared areas as shown in Figure 2.2 of the Australian Standard AS2890.6:2009.
- The Manly DCP 2013 requires the provision of one (1) bicycle stand for every three (3) car parking spaces with a minimum provision of one stand for each premises, i.e. 15 spaces required. Bicycle parking spaces are not presented in the architectural plans. This should be confirmed on the amended plans.
- The basement carpark layout and car spaces appear to be compliant with Australian Standards AS2890.1:2004 Off-Street Parking requirements. However, parking spaces width and ramp width have not been dimensioned and although scaled dimensions suggest they are adequate, this needs to be confirmed on dimensioned plans.
- The proposed driveway is 6m in width for the first 8m into the property which assists ease of access. Swept path plots have shown that it is appropriately sized to permit a B99 vehicle to pass a B85 vehicle entering or exiting the site as required by AS2890.1 clause 3.2.2. The driveway width reduces to 3.6m on the ramp.
- The ramp is single-width and will be no capacity for vehicles to pass on it. To overcome this, a waiting bay inside the carpark and a signal system are required to be included in the plans.
- The driveway and ramp gradients appear satisfactory however a vertical clearance assessment on the driveway ramp should be undertaken, using traffic engineering software such as Autotrack/Autoturn, for a B99 car entering and accessing the carpark to demonstrate that there is adequate overhead clearance and that show any scraping and bottoming does not occur.
- As reported in the Traffic report, garbage collection for the proposed development is expected to be undertaken by Council's waste contractor with bins to be stored on-site and brought out to the kerbside on Whistler Street on collection days.

- It is also reported in the traffic report that there is an existing loading zone on Belgrave Street that operates between 6am-9am Monday to Friday. This loading zone is currently utilised by the existing retail/commercial tenancies and would continue to be used for the purpose of servicing the retail component of the proposed development. Some information regarding future deliveries/loading arrangements, together with details of the delivery arrangements for the proposed retail component of the development, an analysis of future delivery frequency and the suitability of the proposed loading bay to cater for such deliveries should be included in the report.
- It is noted that a pedestrian sightline triangle of 2.0 metres by 2.5 metres, in accordance with AS2890.1:2004 are provided at the vehicular access for pedestrian visibility for exiting vehicles.
- A queueing assessment was included in the traffic report based on the anticipated peak traffic volumes for the development. The analysis confirmed that the 98th percentile inbound queue expected at the access was less than 1 vehicle based on an average service rate of 167 vehicles per hour. The calculated chance of a conflict/queue of the development was 0.21%. Therefore, the likelihood of vehicular conflict in the driveway is considered negligible.

Traffic generation

- The proposal will generate minimal traffic during peak periods; therefore, it will not have any unacceptable implications in terms of road network capacity performance.

Conclusion

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 supported.

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

Construction Traffic Management Plan

A Construction Traffic Management Plan (CTMP) and report shall be prepared by a Transport for NSW accredited person and submitted to and approved by the Northern Beaches Council Traffic Team prior to issue of any Construction Certificate.

The CTMP must address following:

- The proposed phases of construction works on the site, and the expected duration of each construction phase
- The proposed order in which works on the site will be undertaken, and the method statements on how various stages of construction will be undertaken
- Make provision for all construction materials to be stored on site, at all times
- The proposed areas within the site to be used for the storage of excavated materials, construction materials and waste containers during the construction period
- The proposed method of access to and egress from the site for construction vehicles, including access routes and truck routes through the Council area and the location and type of temporary vehicular crossing for the purpose of minimising traffic congestion and noise in the area, with no access across public parks or reserves being allowed.
- Where access is required across private property not in the direct ownership of the proponent, such as a private road/driveway, community title road or right of way, the CTMP is to include:
 - Evidence of the legal right to use the access route or provide owners consent from the owners/strata/community association.
 - Demonstrate that direct access from a public space/road is not viable for each stage of works.
 - Unless owner/strata/community associations consent is obtained, vehicles are not to exceed 24 tonnes or 7.5 metres in length (an assessment must be undertaken that the surface is capable of supporting up to 24 tonnes, otherwise the weight limit should be reduced in the CTMP). If consent is obtained, a copy must be included in the CTMP,
 - No materials or plant are to be located or parked in the private road/driveway, community title road or right of way
 - How any disruption to other users of the private road/driveway, community title road or right of way will be minimised and all users kept informed of likely disruption where the access will be closed or blocked for any given time.
 - A Dilapidation report, including photographic surveys, of the private road/driveway/right of way must be included prior to any works commencing on the site. The report must detail the physical condition of the private road/driveway/right of way, and any other adjacent private property assets or adjacent public property that may be adversely affected by vehicles servicing the development site to undertake works or activity during site works.
 - A requirement for Post-Construction Dilapidation Reports, including photos of any damage evident at the time of inspection, to be submitted after the completion of works and prior to the Occupation certificate. The report must:
 - Compare the post-construction report with the pre-construction report,
 - Clearly identify any recent damage or change to the private road/driveway/right of way and whether or not it is likely to be the result of the development works,
 - Should any damage have occurred, identify remediation actions taken.
 - Be submitted to Council with the Occupation Certificate.
- The proposed method of loading and unloading excavation and construction machinery, excavation and building materials, formwork and the erection of any part of the structure within the site. Wherever possible mobile cranes should be located wholly within the site
- Make provision for parking onsite. All Staff and Contractors are to use the basement parking once available
- Temporary truck standing/ queuing locations in a public roadway/ domain in the vicinity of the site are not permitted unless approved by Council prior
- Include a Traffic Control Plan prepared by a person with suitable RMS accreditation for any activities involving the management of vehicle and pedestrian safety
- The proposed manner in which adjoining property owners will be kept advised of the timeframes for completion of each phase of development/construction process. It must also

specify that a minimum Fourteen (14) days notification must be provided to adjoining property owners prior to the implementation of any temporary traffic control measure

- Include a site plan showing the location of any site sheds, location of requested Work Zones, anticipated use of cranes and concrete pumps, structures proposed on the footpath areas (hoardings, scaffolding or shoring) and any tree protection zones around Council street trees
- Take into consideration the combined construction activities of other development in the surrounding area. To this end, the consultant preparing the CTMP must engage and consult with developers undertaking major development works within a 250m radius of the subject site to ensure that appropriate measures are in place to prevent the combined impact of construction activities, such as (but not limited to) concrete pours, crane lifts and dump truck routes. These communications must be documented and submitted to Council prior to work commencing on site
- The proposed method/device to remove loose material from all vehicles and/or machinery before entering the road reserve, any run-off from the washing down of vehicles shall be directed to the sediment control system within the site
- Specify that the roadway (including footpath) must be kept in a serviceable condition for the duration of construction. At the direction of Council, undertake remedial treatments such as patching at no cost to Council
- The proposed method of support to any excavation adjacent to adjoining properties, or the road reserve. The proposed method of support is to be designed and certified by an appropriately qualified and practising Structural Engineer, or equivalent
- Proposed protection for Council and adjoining properties
- The location and operation of any on site crane

The CTMP shall be prepared in accordance with relevant sections of Australian Standard 1742 – “Manual of Uniform Traffic Control Devices”, RMS’ Manual – “Traffic Control at Work Sites”.

All fees and charges associated with the review of this plan is to be in accordance with Council’s Schedule of Fees and Charges and are to be paid at the time that the Construction Traffic Management Plan is submitted.

A copy of the approved CTMP must be kept on-site at all times while work is being carried out.

The development is to be undertaken in accordance with the Construction Traffic Management Plan approved by Northern Beaches Council Traffic Team.

Reason: To ensure public safety and minimise any impacts to the adjoining pedestrian and vehicular traffic systems.

CONDITIONS THAT MUST BE ADDRESSED PRIOR TO ANY COMMENCEMENT

Work Zones and Permits

Prior to commencement of the associated works, the applicant shall obtain a Work Zone Permit where it is proposed to reserve an area of road pavement for the parking of vehicles associated with a construction site.

A separate application is required with a Traffic Management Plan for standing of construction vehicles in a trafficable lane and a Roads and Maritime Services Work Zone Permit shall be obtained for State Roads.

Reason: To ensure Work zones are monitored and installed correctly.

Road Occupancy Licence

Prior to commencement of the associated works, the applicant shall obtain a Road Occupancy License from Transport Management Centre for any works that may impact on traffic flows.

Reason: Requirement of TMC for any works that impact on traffic flow.

Demolition Traffic Management Plan

As a result of the site constraints, limited vehicle access and parking, a Demolition Traffic Management Plan (DTMP) shall be prepared by an suitably accredited person and submitted to and approved by the Northern Beaches Council Traffic Team prior to commencing any demolition work.

Due to heavy traffic congestion throughout the area, truck movements will be restricted during the major commuter peak times being 8.00-9.30am and 4.30-6.00pm.

The DTMP must:-

- Make provision for all construction materials to be stored on site, at all times.
- The DTMP is to be adhered to at all times during the project.
- Specify construction truck routes and truck rates. Nominated truck routes are to be distributed over the surrounding road network where possible.
- Provide for the movement of trucks to and from the site, and deliveries to the site. Temporary truck standing/ queuing locations in a public roadway/ domain in the vicinity of the site is not permitted unless prior approval is granted by Council's Traffic Engineers.
- Specify that, due to the proximity of the site adjacent to ##### School, no heavy vehicle movements or construction activities effecting vehicle and pedestrian traffic are permitted in school zone hours (8:00am-9:30am and 2:30pm-4:00pm weekdays).
- Include a Traffic Control Plan prepared by an TfNSW accredited traffic controller for any activities involving the management of vehicle and pedestrian traffic.
- Specify that a minimum fourteen (14) days notification must be provided to adjoining property owners prior to the implementation of any temporary traffic control measures.
- Include a site plan showing the location of any site sheds, location of requested Work Zones, anticipated use of cranes, structures proposed on the footpath areas (hoardings, scaffolding or temporary shoring) and extent of tree protection zones around Council street trees.
- Take into consideration the combined construction activities of other development in the surrounding area. To this end, the consultant preparing the DTMP must engage and consult with developers undertaking major development works within a 250m radius of the subject site to ensure that appropriate measures are in place to prevent the combined impact of construction activities. These communications must be documented and submitted to Council prior to work commencing on site.
- Specify spoil management process and facilities to be used on site.
- Specify that the roadway (including footpath) must be kept in a serviceable condition for the duration of demolition. At the direction of Council, the applicant is to undertake remedial treatments such as patching at no cost to Council.

The DTMP shall be prepared in accordance with relevant sections of Australian Standard 1742 – “Manual of Uniform Traffic Control Devices”, RMS’ Manual – “Traffic Control at Work Sites”.

All fees and charges associated with the review of this plan is to be in accordance with Council's Schedule of Fees and Charges and are to be paid at the time that the Demolition Traffic Management Plan is submitted.

Reason: This condition is to ensure public safety and minimise any impacts to the adjoining pedestrian and vehicular traffic systems. The DTMP is intended to minimise impact of construction activities on the surrounding community, in terms of vehicle traffic (including traffic flow and parking) and pedestrian amenity adjacent to the site.

CONDITIONS TO BE COMPLIED WITH DURING DEMOLITION AND BUILDING WORK

Implementation of Demolition Traffic Management Plan

All works and demolition activities are to be undertaken in accordance with the approved Demolition Traffic Management Plan (DTMP). All controls in the DTMP must be maintained at all times and all traffic management control must be undertaken by personnel having appropriate TfNSW accreditation. Should the implementation or effectiveness of the DTMP be impacted by surrounding major development not encompassed in the approved DTMP, the DTMP measures and controls are to be revised accordingly and submitted to Council for approval. A copy of the approved DTMP is to be kept onsite at all times and made available to the accredited certifier or Council on request.

Reason: To ensure compliance and Council's ability to modify the approved Construction Traffic Management Plan where it is deemed unsuitable during the course of the project.

Implementation of Construction Traffic Management Plan

All works and construction activities are to be undertaken in accordance with the approved Construction Traffic Management Plan (CTMP). All controls in the CTMP must be maintained at all times and all traffic management control must be undertaken by personnel having appropriate TfNSW accreditation. Should the implementation or effectiveness of the CTMP be impacted by surrounding major development not encompassed in the approved CTMP, the CTMP measures and controls are to be revised accordingly and submitted to Council for approval. A copy of the approved CTMP is to be kept onsite at all times and made available to Council on request.

Reason: To ensure compliance of the developer/builder in adhering to the Construction Traffic Management procedures agreed and are held liable to the conditions of consent.

Ongoing Management

The applicant shall be responsible in ensuring that the road reserve remains in a serviceable state during the course of the demolition and building works.

Reason: To ensure public safety.

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

Disabled Parking Spaces

Where disabled parking spaces are provided they must be in accordance with AS2890.6:2009.

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

Reason: To ensure compliance with Australian Standards.

Shared Zone Bollard

A bollard is to be provided at the shared zone between disabled spaces in accordance to Australian Standards AS2890.6:2009.

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

Reason: To ensure compliance with Australian Standards.

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

Landscaping adjoining vehicular access

The applicant must ensure that the planting chosen for any land immediately adjacent to the driveway and adjacent to any driveway intersections must not exceed a height of 1m.

Reason: To maintain unobstructed sight distance for motorists.