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Reference: 13.490

22nd May 2014

Urbis
Tower 2, Level 23 Darling Park
101 Sussex Street
SYDNEY 2000 NSW

Attention: Andrew Harvey, Associate Director

Re: Supplementary Report on the Dutton Lane Car Park Proposal, Cabramatta

Dear Andrew,

We refer to the above development application which was the subject of our Peer Review dated 28th November and note that we have undertaken further investigations on behalf of the Cabramatta Business Association. These provide further weight to the matters raised on our Peer Review and have been undertaken in response to Council's Assessment Report as reported to the South West Joint Regional Planning Panel (JRPP) meeting held on 8th May 2013.

1. Parking Provision

- i. The proposed development provides 275 spaces, whereas the DCP required 299 spaces. These 299 spaces comprise 133 spaces under the DCP, the provision of 9 spaces to reinstate the removal of 9 spaces in Hughes Street (to provide loading kerbspace) and the reinstatement of the existing 157 public parking spaces.
- ii. The shortfall of 30 spaces is concerning for any development on this site, with parking supply already known to be under significant and sustained demands. Indeed, even if full compliance with the DCP were to be achieved, in our view this is a critical site in the context of the Town Centre generally and its assessment warrants a more strategic approach. Specifically, while such a strategic approach may not be required in circumstances where this was a private development, the very fact that it is a Council-sponsored development is a special circumstance that provides a unique opportunity to canvass broader planning matters than simply assert and rely on general compliance with the DCP, as has occurred in the TIA Report prepared by Thompson Stanbury Associates.
- iii. In our view, the development cannot be considered as an isolated development. It is for this reason that the nature of existing parking demands within the Town Centre generally is a critical issue and we remain concerned that to date, no parking surveys have been



undertaken by the applicant in support of the development, but merely reliance made on the DCP (which is not achieved in any case, with a 30 space shortfall).

- iv. In order to assess current parking conditions, we have undertaken our own survey of parking within the Town Centre. These were undertaken on Saturday 17th May and Sunday 18th May, between 10am and 2pm, being the peak demands based on local knowledge. The survey covered most on-street and off-street public parking within a distance of about 200 metres. This was designed to determine not only demands within the Dutton Street car park, but also in local roads that were thought to be potentially impacted by parking overspill into residential areas. That is, the survey is geared to an understanding of the extent and nature of current problems within and beyond the Town Centre.
- v. The survey results are provided in Attachment 1 and are summarised in Attachment 2. It is noted that the survey covered a total of 915 spaces, comprising 709 off-street spaces and 206 on-street spaces. The results are summarised below:
 - On Saturday, the peak demand occurred between 11am and 1pm, with effective full utilisation of all spaces (97% off-street and 100.47% on-street). This is an extraordinarily high level of demand, noting that effective full capacity occurs at about 95% utilisation, as it takes some time for circulating traffic to find an available space which is otherwise recorded as being unused. During the survey, there was extensive queuing, circulation and illegal parking activity.
 - On Sunday, the peak demand occurred between midday and 1pm, similarly with effective full utilisation of all spaces (97% off-street and 100.00% on-street). This is also an extraordinarily high level of demand, with extensive queuing, circulation and illegal parking activity.
- vi. In summary, it is clear that the Town Centre is presently under immense parking pressure. Council's response to this issue in relation to this situation is to provide less parking for the development than is required under the DCP, presumably being content to exacerbate these current problems and create further infiltration into residential streets that are not currently impacted. Specifically, the shortfall of 30 spaces represents 200-300 metres of kerbspace (depending on the presence of driveways) and this will have a significant impact on residential areas.
- vii. In our view, the Precinct 2 Controls (Page 30) which reduce the parking provision by 40%, should not be applied in this case. The 40% discount is a recognition that parking in a centralised parking facility provides a public benefit and is able to be used by the wider community (as a public parking facility). However, in circumstances where there is already a demonstrated parking problem in the Town Centre, any such benefit will be offset by the adverse impacts created by further intrusion into residential areas.
- viii. Beyond this concern, it would not be unreasonable in our view to expect that Council would take steps to in fact redress this currently unsatisfactory situation through the provision of additional (not less) parking. Any such parking must be convenient for use, noting that many shopping excursions to the Town Centre involve bulk buys that require reliance on private cars, especially on weekends. We are unaware of any studies that provide a strategic approach to parking and in the absence of this, the absolute minimum that might be expected for this development is full technical compliance with the DCP parking rates, without claiming the 40% concession, resulting a need for an additional 30 spaces.



2. Loading

- ix. Our Peer Review identified that the traffic report states that Dutton Lane precinct (the loop road system) will lose 11 existing and 'publicly accessible' loading spaces in total, comprising 4 truck spaces and 7 van spaces.
- x. Nevertheless, these spaces are all presently under high demand and are located proximate to the buildings that they service. The recent surveys we have undertaken demonstrate that these loading spaces were 100% utilised on Saturday and Sunday and this is evident from the analysis in **Attachment 2**. In these circumstances, there is likely to be a latent demand presently for more loading capacity, even for existing demands.
- xi. In view of this, the loss of 11 existing loading spaces is of great concern and is not offset by the provision of 6 car spaces (suitable only for small vans) in this immediate locality, which will in any case be required by the development itself in view of its inadequate loading provision. The loss of 11 loading spaces will seriously impact that viability of the existing businesses that rely on these fundamentally.
- xii. The suggestion by the applicant that a single loading space is sufficient for the 2,995m² of net lettable retail area proposed under this development (with 30 separate tenancies) is plainly inadequate. The principal determinant of loading requirements is floor area and on that basis, the development would require 7 spaces based on the RMS Guidelines, of which 50% would need to be for trucks. This will include all sizes of trucks which will not be accommodated within the 6 van spaces that are provided.
- xiii. The development therefore will effectively displace all 11 existing loading spaces (4 trucks and 7 vans) that presently rely on the Dutton Lane loop road system, to the 55m long kerbspace that is to be made available within Hughes Street. This is considered to be unreasonable and unequitable, given their relative remoteness. It also ignores the following outcomes:
 - These on-street loading areas will require extensive use of the pedestrian linkages (arcades) and due to security concerns, drivers will be unlikely to use them;
 - The likelihood is that truck and van drivers will double park in the loop road, which defeats the purpose of achieving an enhanced urban amenity. It also raised concerns over delays and conflicts with pedestrians;
 - The provision of 55m of kerbspace along Hughes Street for the exclusive use of trucks will result in a very poor streetscape and amenity, noting that there are residential properties directly across the road; and
 - The loading zone would need to be 3.1m wide to comply with Table 2.1 of AS2890.5, which includes a 0.5m lateral clearance under Clause 2.4(a) of this standard. This may undermine the potential to implement the 'seagull' arrangement as proposed, due to insufficient road width. This is however a matter for detailed design.

3. Construction Traffic Impacts

- xiv. We reiterate that construction traffic impacts associated with this development will be significant and impact adversely on parking conditions, as well as the ongoing viability of businesses, particularly if servicing arrangements are compromised. While it is not unusual for a standard condition of consent to be imposed on the development requiring the preparation of a detailed Construction Traffic and Pedestrian Management Plan, in our view



these impacts are so significant as to warrant a detailed plan to be prepared outlining the principles to be adopted (if not a final plan). It will be essential to demonstrate how access will be maintained to existing properties, how pedestrians will be managed, how parking overspill will be mitigated and how construction worker vehicles will be accommodated. We note that the absence of a detailed CTMP that properly considers impacts on the viability of businesses in the locality would be grounds for claims for compensation due to loss of trade.

- xv. The impact of construction traffic is of such importance as to warrant resolution prior to any determination and cannot in our view be dealt with under a standard condition of consent. A detailed assessment is required, as would occur for any complex site situated within a vibrant area characterised by very high pedestrian concentrations.

4. Design Deficiencies

- xvi. The development has numerous design deficiencies and these are outlined in our previous Peer Review. Generally, the access principles require further consideration and the proposed exit ramp appears at odds with the objective of improving pedestrian safety and amenity.

5. Internal Design Aspects

- xvii. It is reiterated that the internal design aspects have been based upon design using a B85 Design Car as defined in AS2890.1 (Page 14 of the Traffic report refers). This is the design vehicle that is used only to assess access to parking spaces and in relation to ramps and primary circulation aisles, the design should be based on the B99 Design Car in accordance with Clause B2.2 of AS2890.1. To that extent, the swept paths provided in the report are unsuitable for the purpose of demonstrating that the proposed design is satisfactory.

6. Summary and Conclusions

In view of the above, we consider that while the proposed use may be supportable in principle, the absence of sufficient parking for the development (even setting aside existing problems) and the removal of loading spaces that are critical to the ongoing viability of current businesses are fundamental flaws that require further detailed consideration, in the public interest.

We trust that this further advice is of assistance and we are available to attend any meetings, should this be required. Please contact the undersigned should you have any queries regarding this matter.

Yours faithfully,

traffic

Graham Pindar
Director

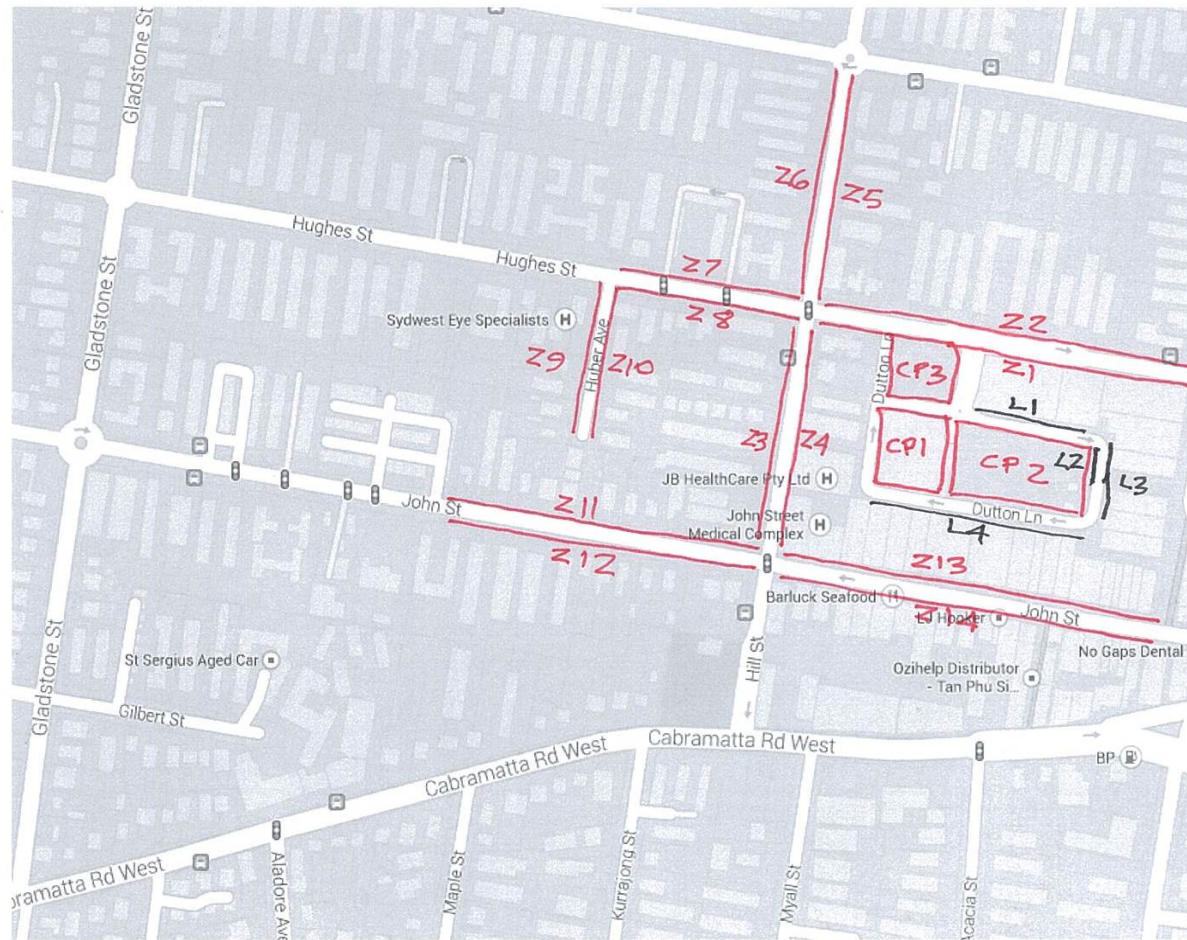
Encl: Attachments 1 and 2



Attachment 1

5/15/2014

Google Maps



<https://www.google.com/maps/@-33.894185,150.9350956,17z>



TRAFFIX SURVEYS	
Location:	Cabramatta
Day and Date	Saturday, 17 May 2014
Time:	10:00
Weather:	Fine
Surveyor(s):	

LZ: Loading Zone
ill.: Illegal
Reserved: Reserved with cones
TR: Truck
MB: Motorbike
MZ: Mail Zone

	Location																									
	Off Street Spaces												On Street Spaces													
													Zone Number													
Zone	CP1 - Level 1	CP1 - Level 2	CP1 - Level 3	CP1 - Level 4	CP1 Extension South	CP1 Extension West	CP2 broken down	CP3	L1	L2	L3	L4	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Capacity	97	118	120	120	29	31	160	68	18	9	8	21	9	0	9	7 + 3LZ	15	18	12	9	11	11	22	22	35 + 1M2	27
Time Start																										
10:00	70 + 23 Reserved	118	120+1ill.	86+1ill.	27	14	158	67	17	9	7	21	9	0	9	7 + 2LZ	13+1TR	18	11	9	11	10	23 + 1ill.	21 + 1TR	35	24 + 2MB
11:00	72 + 22 Reserved	118	120	114+1ill.	27	15	160	68	18	8	7	20	9	0	9 + 1il	7 + 3LZ	13+1TR	18	12	9	11	11	22 + 1ill.	21 + 1TR	35 + 1ill.	26
12:00	74 + 21 Reserved	118+1ill.	120	114+2ill.	29	17	159	68	18	9	8	21	9	0	9 + 1MB	7 + 2LZ	13+1TR	18	13	9	11	11	22 + 1ill.	21 + 1TR	35	27
13:00	82 + 12 Reserved	114+1ill.	119	111+1ill.	24	23	159	68	18	9	8	20	9	0	9 + 1MB	7 + 3LZ	13+1TR	18	12	9	10	11	22 + 1ill.	21 + 1TR	35	27
14:00	84 + 10 Reserved	118+1ill.	118	108+1ill.	22	20	159	68	18	9	8	20	8	0	9	7 + 3LZ	13+1TR	18	12	8 + 1ill.	10	8	23	21 + 1TR	35	27



TRAFFIX

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Zone	CP1 - Level 1	CP1 - Level 2	CP1 - Level 3	CP1 - Level 4	CP1 Extension South	CP1 Extension West	CP2 broken down	CP3	L1	L2	L3	L4	1	2	3	4	5	6	7	8	9	10	11	12	13	14	
Capacity	97	118	120	120	29	31	160	68	18	9	8	21	9	0	9	7 + 3LZ	15	18	12	9	11	11	22	22	35 + 1MZ	27	
Time Start																											
10:00	71 + 23 Reserved	117	120	51	18	2	157	68	17	8	8	20	9	0	9	7 + 3LZ	12+1TR	18	12	8+1TR	11	10	20+1TR	22	35+1 ill.	26+2MB	
11:00	73 + 20 Reserved	118	120	79	21	10	160	68	17	9	8	20	9	0	9	7 + 3LZ	12+1TR	18	12	8+1TR	11	11	21+1TR	22	35+1 ill.	26+1MB	
12:00	75 + 19 Reserved	118	120	113	25	11	159	68	18	9	8	21	9	0	9 + 1 ill.	7 + 3LZ	12+1TR	18	12	8+1TR	11	11	21+1TR	22	35+1 ill.	26+2MB	
13:00	72 + 22 Reserved	118	119	118	26	21	160	68	18	9	8	21	9	0	9	7 + 3LZ	12+1TR	18	12	8+1TR	8	10	20+1TR	21	35+1 ill.	26+1MB	
14:00	67 + 25 Reserved	118	120 + 1 ill.	119 + 1 ill.	27	30	159	68	17	8	8	20	8	0	9	7 + 3LZ	12+1TR	18	12	8+1TR	9	10	19+1TR	20	35+1 ill.	26+2MB	



Attachment 2

Saturday, 17 May 2014

Zone	Off-street	On-street	Loading
Capacity	743	211	56
10:00	685	208	54
11:00	717	212	53
12:00	723	212	56
13:00	714	211	55
14:00	709	206	55

Peak Volume %

Zone	Off-street	On-street	Loading
10:00	92.19%	98.58%	96.43%
11:00	96.50%	100.47%	94.64%
12:00	97.31%	100.47%	100.00%
13:00	96.10%	100.00%	98.21%
14:00	95.42%	97.63%	98.21%
Average	95.50%	99.43%	97.50%

Spare Capacity

Zone	Off-street	On-street	Loading
10:00	58	3	2
11:00	26	-1	3
12:00	20	-1	0
13:00	29	0	1
14:00	34	5	1
Average	33	1	1

Sunday, 18 May 2014

Zone	Off-street	On-street	Loading
Capacity	743	211	56
10:00	627	208	53
11:00	669	209	54
12:00	708	211	56
13:00	724	203	56
14:00	735	202	53

Peak Volume %

Zone	Off-street	On-street	Loading
10:00	84.39%	98.58%	94.64%
11:00	90.04%	99.05%	96.43%
12:00	95.29%	100.00%	100.00%
13:00	97.44%	96.21%	100.00%
14:00	98.92%	95.73%	94.64%
Average	93.22%	97.91%	97.14%

Spare Capacity

Zone	Off-street	On-street	Loading
10:00	116	3	3
11:00	74	2	2
12:00	35	0	0
13:00	19	8	0
14:00	8	9	3
Average	50	4	2