

Our Reference: **PT17063**

United Cinemas
C/O: MM Atelier Architects
PO Box 87
Mona Vale NSW 1660

29 May 2018

Att: Ms Vanessa Benitez

Via email: vanessa@mmaarchitects.com.au

**United Cinema Complex Gregory Hills
Request for Additional Information Response**

As requested we have reviewed the request for additional information from Camden Council dated 23 April 2018 and please find below information pertaining to each issue relating to traffic, parking and access matters.

For ease of reference each issue is repeated below with a response. Further, in response to the issues raised by Council the design of the development / parking and access areas has been revised and these plans are provided in **Appendix A** of this report.

**Traffic
Issue**

1. *For land uses that Camden Development Control Plan 2011 (Camden DCP) does not provide a prescribed parking rate, survey data from other similar uses in similar locations are required to demonstrate a suitable rate. For example, the cinema and recreation facilities parking rate should be based on a facility of similar development and not situated near a train station or transport hub.*

Response

As requested in the above comment the traffic report prepared for the development application has specifically assessed a directly comparable development to determine potential traffic and parking needs of the proposal. This information has been used to support similar development applications in comparable areas.

As per the requirements of the RTA Guide to Traffic Generating Developments, survey of a directly comparable facility was utilised to determine an appropriate parking provision for the cinema components. Of note above, Council's DCP does not include any parking rates for cinemas and is referring to a parking rate applied to the Narellan Town Centre which is not comparable to this site.

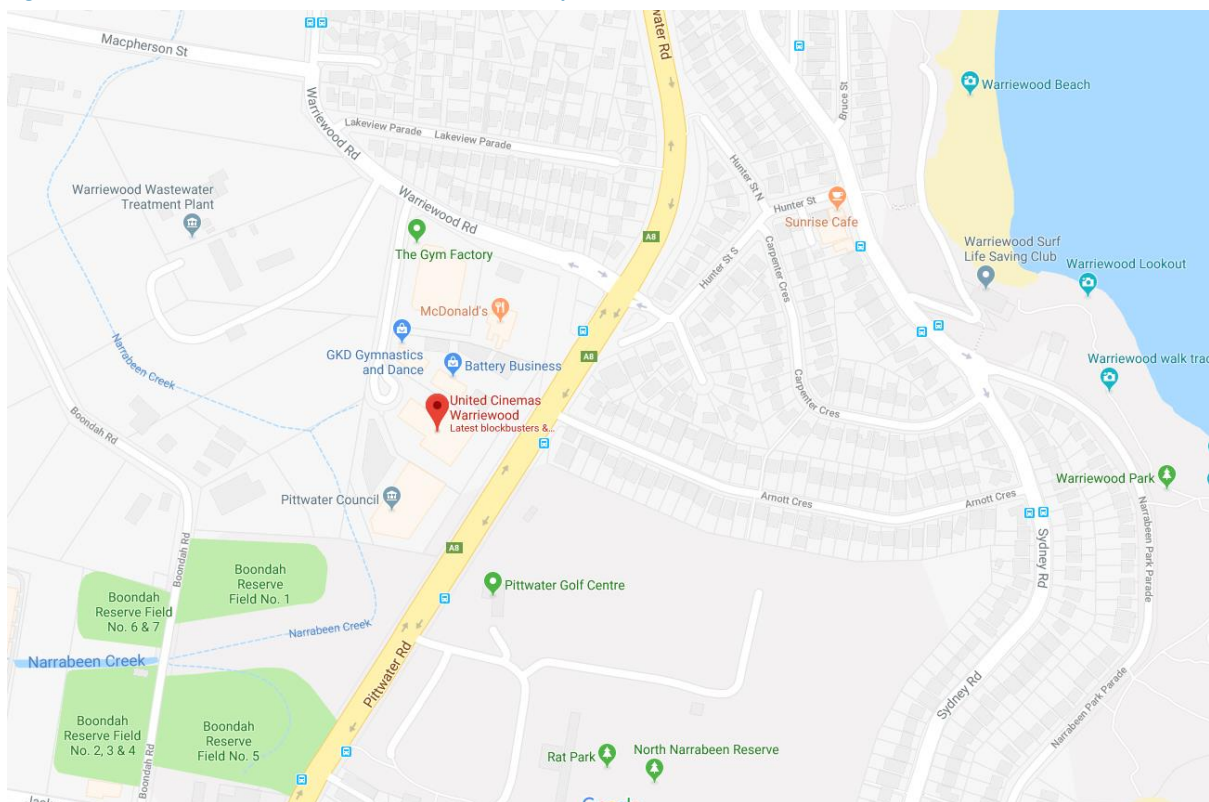
The Warriewood Cinema complex has a number of similarities to the proposed development and was surveyed as part of the development of the traffic report. These similarities with the Warriewood Cinema Complex include but are not limited to:

- The cinema is not located within a convenient walking distance to a rail line or rail station.
- The cinema is located within a short drive to an arterial road system immediately surrounded by commercial / industrial uses with residential dwellings located a short distance away
- The cinema is located within a short walking distance to local and regional bus services.
- The cinema complex includes restaurant / entertainment facilities.
- The same operator of the proposed development operates the Warriewood Cinema Complex.

The data collected from the Warriewood Cinema is considered 'clean' with little to no influx of parking / traffic demands by other developments and provides a solid base for determining the parking needs and potential traffic impacts of the proposed development.

The location of the Warriewood Cinema Complex is shown below in **Figure 1**:

Figure 1 - Location of United Cinemas Warriewood Complex



Of further note the survey data collected from the Warriewood Complex has been used as part of the approval of another United Cinema Complex in McGraths Hill NSW. This site also exhibited the same locational characteristics of the proposed site at Gregory Hills.

For investigations into the potential traffic impacts and parking demands of 'recreational facilities', the following is noted from the RTA Guide to Traffic Generating Developments:

5.9 Recreational and tourist facilities.

5.9.1 Recreational facilities.

Definition.

*A recreation facility is a building or place used for indoor or outdoor recreation, but does not include places of assembly. A billiard saloon, table tennis centre, squash centre, swimming pool, gymnasium, health studio, bowling alley, **fun parlour or any other building of a like character used for recreation** (whether or not used for the purpose of gain), is considered to be a recreation facility.*

Parking.

Off-street car parking must be provided to accommodate peak demand periods at the facility. Analysis ideally should be based on a predicted 85th percentile usage. In the case of large recreation developments, development applications must be supported by a traffic impact statement which incorporates a survey of similar developments.

Research by the RTA has failed to find a conclusive relationship between parking demand and the size and nature of the recreation facilities surveyed, indicating that the number of parking spaces required is best determined by the nature of the proposed development.

Overall the approach to determine the potential traffic impacts and parking needs of the proposed development has given specific consideration to the type of the development and based on detailed surveys of an existing facility which is considered a direct comparison to the proposed development.

Issue

5. The loading dock within the driveway to tenancy 1 conflicts with customers accessing the drive through and could lead to safety issues and queuing of vehicles on the road. Please address.

Response

In response to Council comments the design of the loading dock and adjacent drive thru access road has been modified to ensure both light and heavy vehicle travel in the same direction. Further, all reversing of the service vehicle is undertaken from an area separate to the main flow of traffic in the drive thru lane.

The proposed arrangements provide sufficient queuing area for a minimum of five (5) vehicles which complies with the requirements of the DCP.

The turn path analysis of the revised loading dock arrangement is provided in **Appendix B** of this report. This matter is considered resolved.

Issue

12. Queuing for 5-12 cars must be identified on the plans for the three take away food and drink premises.

Response

The revised plans provided in **Appendix A** confirm that all drive thru developments would provide a minimum queue area to allow five (5) vehicles to queue wholly within the property of each development.

This issue is considered resolved.

Issue

15. The traffic report identifies that there should be an additional four external seats which are not identified on the plans. Please address.

Response

The revised plans provided in **Appendix A** confirm that the plans reflect the correct number of seats estimated in the traffic report.

This issue is considered resolved.

Issue

The proposed parking rate is not accepted and the overall parking rate should be derived from a similar development approved at 7 Gregory Hills Drive, Gregory Hills under DA/2017/45/1. The approved rates for the cinema which required a rate of one car parking space per five seats were based on the United Cinemas operating at Narellan Town Centre. Reference should be made to the Sydney Western City Planning Panel Paper-18 December 2017-2017-2017SSW013 for the approved parking rates. Council does not accept the argument of using linked trips to reduce the required parking provision.

Response

The above comment does not consider either the proposal on its own merit or the approach of the traffic report which has been undertaken in accordance with the RTA Guide to Traffic Generating Developments.

Whilst it is noted that Council (and the Sydney Western City Planning Panel) applied the Narellan Town Centre parking rate for a nearby cinema complex proposal, the application of this rate to this development is not relevant nor does it consider the surveys of a similar facility as per the requirements of the DCP presented in the traffic report.

On the matter of linked trips when considered the necessary parking requirements of a development, the following is noted in Camden Councils Development Control Plan **Part B Section 5.1**

Calculation of Spaces

- (2) *Calculations for the number of parking spaces will primarily be based on the gross floor area of the development, unless otherwise specified. Council may consider variations to parking rates in certain circumstances that do not warrant demand and may be supported by a car parking and traffic impact assessment study submitted with a development application. Council will also give consideration to other features of the development such as proposed maximum staffing levels, expected customer levels etc. where warranted.*

The consideration of surveyed customer levels for this development based on detailed surveys of a directly comparable development has not been considered by Council despite the fact that Council's own DCP acknowledges it is a necessary consideration.

On the matter of linked trips, the RTA Guide to Traffic Generating Developments clearly acknowledge linked trips do occur for retail type developments where a range of uses are available for patronage. Overall, parking for this development has been based on specific surveys of a comparable development.

Issue

2. *The traffic generation and impact of the surrounding road network and intersections need to be reassessed based on the reassessment of the off-street parking provision.*

Response

Any change to parking provision of this development will not change the traffic generation estimates of the traffic report submitted as part of the development application.

The traffic generation rates provided in the traffic report have been determined from a first principles basis and surveys of a directly comparable development and are considered an appropriate measure of potential traffic impacts of the proposal. Further, the traffic generation of other proposed uses at the site including retail, take away and restaurants have been based on rates provided in the RTA Guide to Traffic Generating Developments.

Issue

Roads and Maritime Services (RMS)

1. *The submitted traffic analysis for this application does not include traffic surveys of the current traffic conditions on the surrounding road network. The applicant has also not provided information regarding the trip distribution expected for the proposed development. Therefore, it is not clear how it was determined that the additional daily and peak vehicle trips from the proposed development will not alter the current levels of service and can be readily accommodated within the existing road network.*
2. *The Camden Valley Way/Gregory Hills Drive intersection is operating at a poor level of service and is at capacity. Roads and Maritime requests traffic surveys and SIDRA modelling for further consideration of the cumulative impacts of this development on the Camden Valley Way/Gregory Hills Drive intersection.*

3. *The submitted traffic analysis does not consider the traffic generation and trip distribution of service vehicles for the proposed development, particularly the vehicle type and likely arrival and departure times.*

Response

The traffic report included references to the traffic report prepared for the previously approved development at the site which found all local surrounding intersections would operate at a satisfactory level of service in the future at full development of the subject site. This is shown below.

Table 3.1 Intersection Analysis Results

| Intersection | Intersection Control | Degree of Saturation | Peak Traffic Period | | |
|-----------------------------------|----------------------|----------------------|---------------------|---------------------|------------------|
| | | | Delay (s) | 95th %ile Queue (m) | Level of Service |
| Lasso Road/Central Hills Drive | Roundabout | 0.308 | 13.1 | 10.5 | A |
| Rodeo Road/Central Hills Drive | Roundabout | 0.195 | 12.4 | 5.6 | A |
| Roden Road/Steer Road | T-Junction | 0.537 | 21.7 | 23.7 | B |
| Steer Road/Lasso Road/Bronco Lane | Roundabout | 0.134 | 12.1 | 4.0 | A |

It is noted that the previous approval for the site did not include or require an assessment of the intersection of Camden Valley Way / Gregory Hills Drive. It is also noted that this intersection has been recently upgraded with the size of the intersection determined through area wide traffic modelling of full development of the Oran Park, Gregory Hills and Narellan Town Centre precincts.

As stated in [Section 6](#) of the traffic report, all uses which were listed in the RTA Guide to Traffic Generating Developments were applied with the recommended RTA traffic generation rate. All other uses were estimated based on surveys of a directly comparable development.

The proposed development was estimated to generate some 557 PM peak hour trips two way compared to 525 PM peak hour trips of the approved development. It is my view that the marked spare capacity of surrounding local intersections as modelled in the original traffic report would not be compromised with an additional 25 PM peak hour trips spread over 4 local intersections.

As stated in Section 6.2.4 of the traffic report submitted with the development application, the AM peak hour traffic generation of this proposal would be significantly less than the estimated **712** peak hour trips which would have been generated by the previous approval for the site. That is, the major component of the development, namely the recreational / cinema spaces would generate very little traffic during the AM road network peak.

Overall it is my opinion that:

- modelling of the previously approved application clearly showed significant spare capacity of local intersections at full development of the site

- the minor increase of 25 PM peak hour trips of this proposal over and above the previously approved proposal would not impact on the operation of surrounding local intersections nor would require detailed intersection modelling to justify this position; and
- the proposed development would be a significantly less traffic generator in the AM peak period compared to the previously approved development at the site which would have generated some 712 AM peak hour trips two way.

Please do not hesitate to contact myself on 0414 462247 should you require any additional information.

Yours sincerely

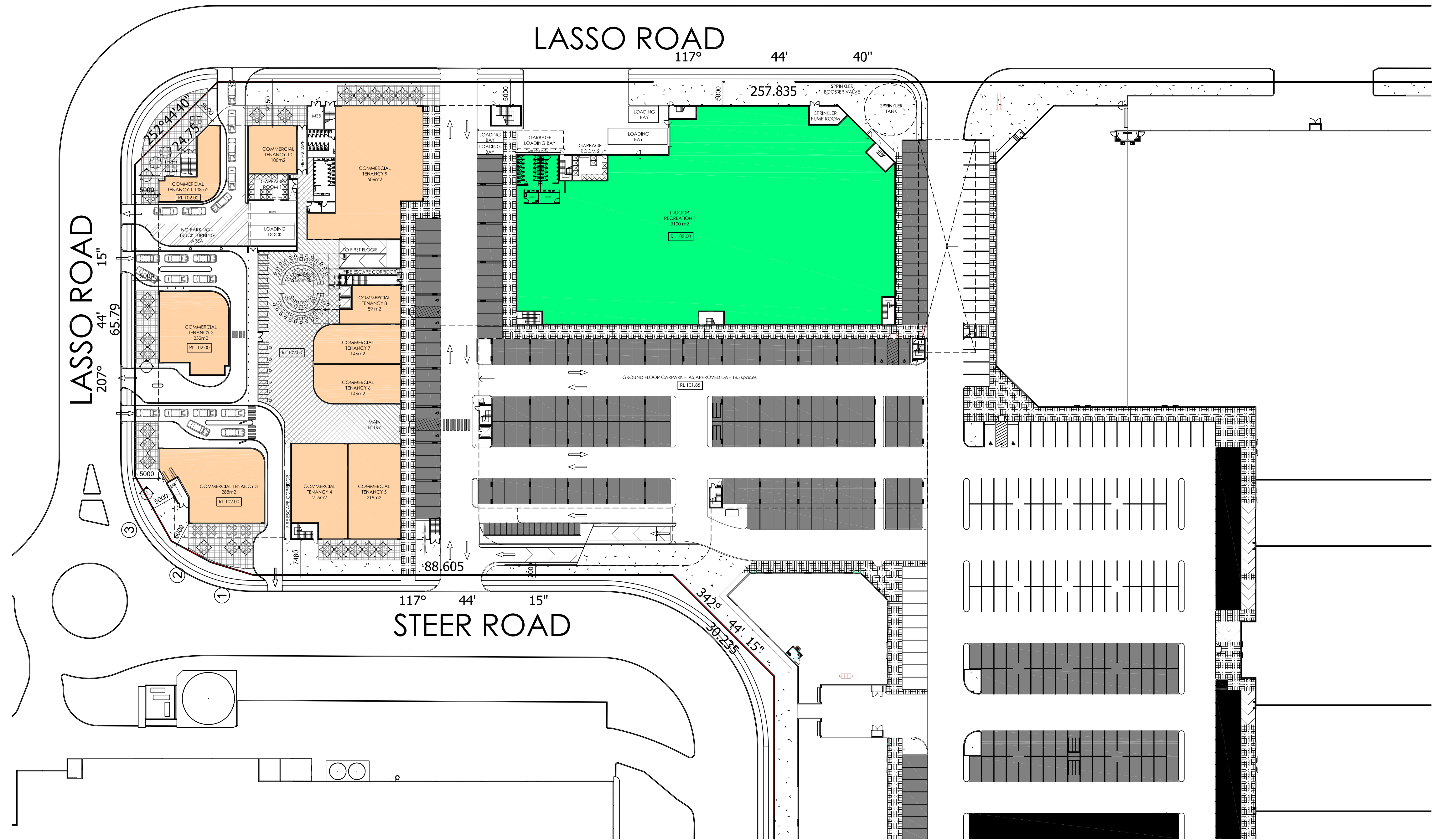
A handwritten signature in black ink, appearing to read 'D Brodie', with a horizontal line underneath.

DEAN BRODIE

Managing Director

Appendix A – Revised Design Plans

| SCHEDULE OF SHORT LINES | | |
|-------------------------|------------|----------|
| N°. | BEARING | DISTANCE |
| 1 | 314°33'30" | 9.42 |
| 2 | 325°55'00" | 9.42 |
| 3 | 178°31'15" | 15.725 |



1 SITE PLAN
SCALE 1:500

| AMENDMENTS | | |
|------------|----------|------------------------------------------------|
| H | 31.05.18 | RESPONSE TO COUNCIL QUERIES |
| G | 29.01.18 | BOUNDARY HIGHLIGHTED & GROUND FLOOR PLAN SHOWN |
| F | 29.11.17 | DA SUBMISSION |
| E | - | NOT ISSUED |
| D | - | NOT ISSUED |
| C | - | NOT ISSUED |
| B | - | NOT ISSUED |
| A | - | NOT ISSUED |
| IS | DATE | DESCRIPTION |
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|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------|-------|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|--------|----------|------|--|--|
| AUTHORISED | <div>Notes:</div> <div>The information contained in this document is copyright and may not be used or reproduced for any other project or purpose.</div> <div>Verify all dimensions and levels on site and report any discrepancies prior to the commencement of work.</div> <div>Drawings are to be read in conjunction with all contract documents.</div> <div>Use figured dimensions only. Do not scale from drawings.</div> <div>The Architect cannot guarantee the accuracy of content and format for copies of drawings issued electronically.</div> <div>The completion of the issue details checked and authorised section below is confirmation of the status of the drawing.</div> <div>The drawing shall not be used for construction unless endorsed "For Construction" and authorised for issue.</div> | TOWN PLANNER | STORMWATER | NORTH | ARCHITECT | PROJECT | 5m101520253035 | | | | | |
| | | DFP PLANNING PTY LTD | CARDNO | | | ATELIER ARCHITECTS ABN 94 100 875 125 PO Box 87 Mona Vale NSW 1660 PH: (02) 9970 2817 MOB: 0401 000 075 nominated architect Vanessa Benitez 7446 | UNITED CINEMAS GREGORY HILLS | SCALES | DRAWN | DATE | | |
| | | TRAFFIC ENGINEER | ACOUSTIC | | | | 1:500@A1 | VB | SEP 2017 | | | |
| | | POSITIVE TRAFFIC PTY LTD | ACOUSTIC LOGIC | | | DRAWING | SHEET No. | | ISSUE | | | |
| | | BCA CONSULTANT | QUANTITY SURVEYOR | | | SITE PLAN - GROUND FLOOR | DA01 | | H | | | |
| | | GRS BUILDING REPORTS PTY LTD | HUGH B GAGE | | | | | | | | | |

Appendix B - Loading Dock Turn Path Analysis

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