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Transport Planning, Traffic Impact Assessments, Road Safety Audits, Expert Witness

30 July 2020

Reference: 190510.05FB

Mintus
Suite 506, Level 5,
55 Phillip St,
Parramatta NSW 2150
Attention: James Vergos

LETTER OF RESPONSE TO COUNCIL COMMENTS FOR MIXED USE DEVELOPMENT AT 90-98 GLENMORE RIDGE DRIVE, GLENMORE PARK

Dear James,

Reference is made to your request to provide supplementary traffic and parking advice with regards to the proposed Mixed Use Development at 90-98 Glenmore Ridge Drive, Glenmore Park (Concept Site layout in **Annexure A**). This letter provides a response to Penrith City Council's comments, as provided in their email dated 23 July 2020 for DA19/0348. Each of the Council's comments relevant to traffic and parking is reproduced in italics and responded to in the following sub-sections.

1 Medical Centre Parking

The scale of the proposed medical centre (which the applicant's traffic response letter, dated 11 June 2020 describes as "low scale"), appears to be much greater than that described in the revised traffic report (please refer to my first referral response where I have outlined this aspect in considerable detail). Comparisons in the revised traffic report to usage rates at the medical centre at 6 Bija Drive Glenmore Park are not considered to be applicable. The proposed medical facility at Glenmore Ridge Drive will entail (accordingly the application's Medical Centre Operation Plan) general practice services, emergency services, cardiology, high dependency care, imaging services (including CT, ultrasound and radiology), dental, drug health services, maternity, aged care, paediatric and physiotherapy services.

As an operator appears to have already been engaged (refer to the Medical Centre Operation Plan submitted with this DA) to operate/lease the proposed medical facility, it should be possible to provide information to Council as to how many health care professionals and support staff will actually be required to run the proposed operations outlined above. The revised traffic report with uses RMS estimates (rates given on page 8 of the revised traffic report, at the base of Table 2, see note 2), which is likely inconsistent with the description of the wide range of medical services outlined above. In any case it should be possible to provide

specific details on this aspect of the proposal and the additional information is request from the applicant.

There is also discrepancy as to the size of the proposed medical centre, as Table 2 indicates 750m² whereas Table 4 indicates 562m² (as presented on pages 8 and 12, respectively, in the revised traffic report). This needs to be clarified by the applicant.

The proposed scale of the medical centre has been included within the assessment, with the associated parking demand able to be adequately catered for within the proposed car parking area. As such, the proposed scale is acceptable and accepted on parking grounds.

Reference is made to the **MTE** traffic report (ref: 18280.03FC, dated 12 June 2020), which references the Glenwest Medical Centre in order to understand the parking demand of a medical centre development in the context of the Penrith LGA. The particular medical centre was selected as it is in a similar area to the proposed development and therefore is likely to exhibit similar usage demands at similar times. Further, other medical centres in the area such as the Glenmore Park Medical Centre were not used due to the lack of data.

Google “Popular Times” data was used in the creation of the expected parking demand of the medical centre component of the development throughout the day. Google “Popular Times” data is presented on Google Maps, and shows how ‘busy’ a particular site is at hourly intervals. Busyness is measured by number of people at the development within any given hourly period. Over time, this data provides an ‘average’ usage whereby showing the ‘average busyness’ of a development throughout the week.

Simply put, the comparison to the Glenwest Medical Centre for the proposed medical centre was used as to provide a parking demand profile that is similar to the area. It is unlikely that the peak of the proposed medical centre will differ significantly from that of the sample data and as such, the comparison is reasonable.

It is noted that the uses outlined within Council’s comment are typical of a medical centre development. The *RMS Guide to Traffic Generating Developments 2002*, as adopted by Transport for New South Wales (TfNSW), defines a medical centre as “a building with a subdivision of rooms being used by legally qualified general medical practitioners, dentists within the meaning of the *Dentists Act, 1934*, and registered health care professionals.” The uses outlined in the operational plan are consistent with this definition. As such, the proposed uses are acceptable, with the parking demand of these uses consistent with the rates applied and therefore, no further assessment is required.

Finally, there is no discrepancy between areas used within the **MTE** traffic report submitted with the letter dated 11 June 2020, with *Table 2* presenting the gross floor area (GFA) and *Table 4* presenting the gross leasable floor area (GLFA), being 750m² GFA and 562m² GLFA respectively. Please refer to *Section 3.2.2* and *Table 3* within the MTE traffic report for further detail on this. These were shown according to the rate applied within the specific table and are correctly incorporated.

2 Access & Parking

2.1 Swept Path Testing

3. The acute bend at the south-western corner of the at-grade car park shall be redesigned to be no less than 90 degrees to avoid corner cutting. The Traffic Letter has provided turning paths to demonstrate that two-way passing can be achieved around the bend, however the turning paths conflict with the pedestrian path of travel for accessible parking which isn't considered appropriate. The acute bend shall be redesign accordingly.

The plans have been updated in order to accommodate two-way passing around the subject bend whilst not entering the line-marked pedestrian path. Swept path testing has been conducted as shown in **Annexure B** depicting this provision.

2.2 Car Parking Space Dimensions

4. Residential parking spaces should be a minimum width of 2.5m to accommodate full opening of vehicle doors in accordance with the DCP and AS2890. It is noted that the 2.4m wide spaces provided in the basement carpark comply with the Australian Standard as a minimum requirement, however they do not achieve compliance with the DCP. For Development Services consideration as this is a DCP control.

First and foremost, the Australian Standards are a mandatory document, whereby AS2890.1:2004 “sets out the minimum requirements for the design and layout of off-street parking facilities, including multi-storey car parks for motor cars, light vans and motorcycles. It includes access and egress requirements for both public and private car parks, and car parking on domestic properties”. In contrast, a DCP is a Council produced guideline, which is not a mandatory design standard in relation to traffic and parking. As such, the requirements of the relevant Australian Standards shall be used as a basis of car parking design.

The requirement for 2.5m wide residential car parking spaces is inconsistent with AS2890.1:2004 design standards, as previously detailed in **MTE's** letter (ref: 190510.02FA, dated 11 June 2020). This letter clearly outlines the required and acceptable design dimensions of residential car parking spaces, with the 2.4m width allowing for practical door opening room for users of the vehicle to enter and alight. Further, the 2.5m space width requested aligns with a User Class 2 being listed as for “Long-term city and town centre parking, sports facilities, entertainment centres, hotels, motels, airport visitors (generally medium-term parking)” in Table 1.1 of AS2890.1:2004. It is evident that residential users do not fall into this category, but rather matches the definition of the User Class 1A category, listed for “Residential, domestic and employee parking”. The requirement for residential car parking spaces to be larger than 2.4m wide within a compliant car park design is unsubstantiated and unreasonable.

Furthermore, Section C10 – 10.5.1 Parking – C 5) Design of Parking and Manoeuvring Areas of Council's DCP outlines the following:

For residential development, other than a single residence, the minimum space width shall provide for full door opening in accordance with Table B1 of AS2890.1:2004.

Table B1 of AS2890.1:2004 outlines that a width of 2.6m is required for full door opening, inconsistent with the Council's request for 2.5m wide spaces for full door opening. It is noted that this section has been included within the annexure of AS2890.1:2004, being a supplement to the document (i.e. not within the body of the guide) and is not the design standard for residential car parking spaces. It is

noted that *Table 1.1* of *AS2890.1:2004* states that a User Class 2 space allows for full door opening. With reference to *Figure 2.2* of *AS2890.1:2004*, a User Class 2 space requires a width of 2.5m. With this section being the actual design part of the standard (not an annexure), it is clear that the Australian Standards require a 2.5m wide space to allow for full door opening with Council's DCP reference to *Table 1.1* contradicting Council's own DCP.

In any case, a 2.6m wide car parking space is a design for User Class 3 or 3A being listed as "*Short term high turnover parking*" in *Table 1.1* of *AS2890.1:2004*. Providing 2.6m is an over design for residential use considering the current design meets the Australian Standard requirements and therefore allows for adequate door opening.

Notwithstanding the above, the proposed residential car parking layout is provided in an open format, such that full door opening can be achieved by relying partially upon the adjacent car parking space. The reliance on the adjacent car parking space based upon the above would be limited to 100mm, which is a minor encroachment, even when a car is parked in the adjacent parking space and is typical for low turnover residential car parks. The requirement to allow for the full door opening within the actual car parking space is unnecessary and the design complies with *AS2890.1:2004* requirements.

It is noted that the parking envelope in *Figure 5.2* of *AS2890.1:2004* clearly shows that the neighbouring space is to be used for door opening, with a 300mm area on either side of the space utilised. The Australian Standards therefore have considered door opening within their design and as such, the 2.4m width of the User Class 1 space is acceptable. In the event that a wall is directly adjacent to a 2.4m wide car parking space, as required under the standards additional widening of 0.3m is required to allow for door opening.

Please contact Mr Matthew Elyard or the undersigned on 8355 2440 should you require further information or assistance.

Yours faithfully,

McLaren Traffic Engineering



Tom Steal
Senior Traffic Engineer

BE Civil AMAITPM MIEAust
RMS Accredited Level 1 Road Safety Auditor
RMS Accredited Work Zone Traffic Management Plan Designer and Inspector



**ANNEXURE A: PROPOSED PLANS
(2 SHEETS)**

REFERENCES
DRAWINGS TO BE READ IN CONJUNCTION WITH BUT NOT LIMITED TO ALL STRUCTURAL, ENGINEERING, STORMWATER ENGINEERING, LANDSCAPE ARCHITECTS, AND OTHER ASSOCIATED PLANS & REPORTS
REFER TO THE BASIC REPORT FOR ADDITIONAL REQUIREMENTS

NOTES
ALL DIMENSIONS AND SETOUTS ARE TO BE VERIFIED ON SITE AND ALL DIMENSIONS OR ANY DISCREPANCIES TO BE NOTIFIED TO THE ARCHITECT
REQUIRED DIMENSIONS TO BE USED AT ALL TIME
DO NOT SCALE MEASUREMENTS OFF DRAWINGS



PARKING LEGEND

- BICYCLE PARKING 600x1200
- CAR WASH PARKING 3400x5400
- COMMERCIAL ACCESSIBLE PARKING 2600x5400
- COMMERCIAL PARKING 2600x5400
- MOTORCYCLE PARKING 1200x2500
- RESIDENTIAL ACCESSIBLE PARKING 2400x5400
- RESIDENTIAL PARKING 2400x5400, U.N.O.
- SERVICES / CARRIER PARKING 2600x7500

LEGEND

GT GREASE TRAP

*ALL SPEED HUMPS REDUCED TO ALLOW TROLLEYS PASS

E	27.07.2020	GENERAL AMENDMENTS
D	24.06.2020	GENERAL AMENDMENTS
C	02.06.2020	GENERAL AMENDMENTS
B	10.02.2020	GENERAL AMENDMENTS
A	17.05.2019	DA SUBMISSION
Rev.	Date	Description

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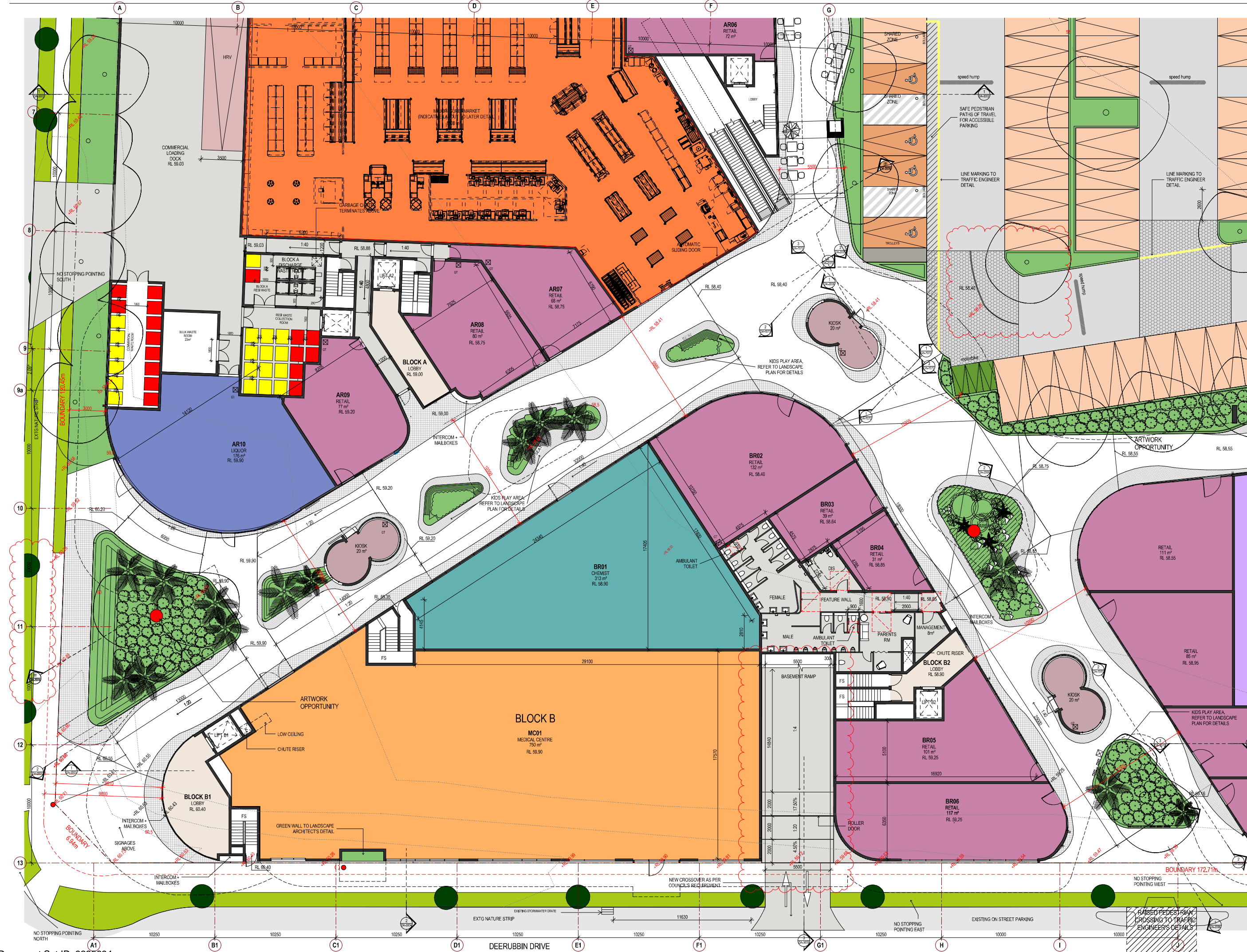
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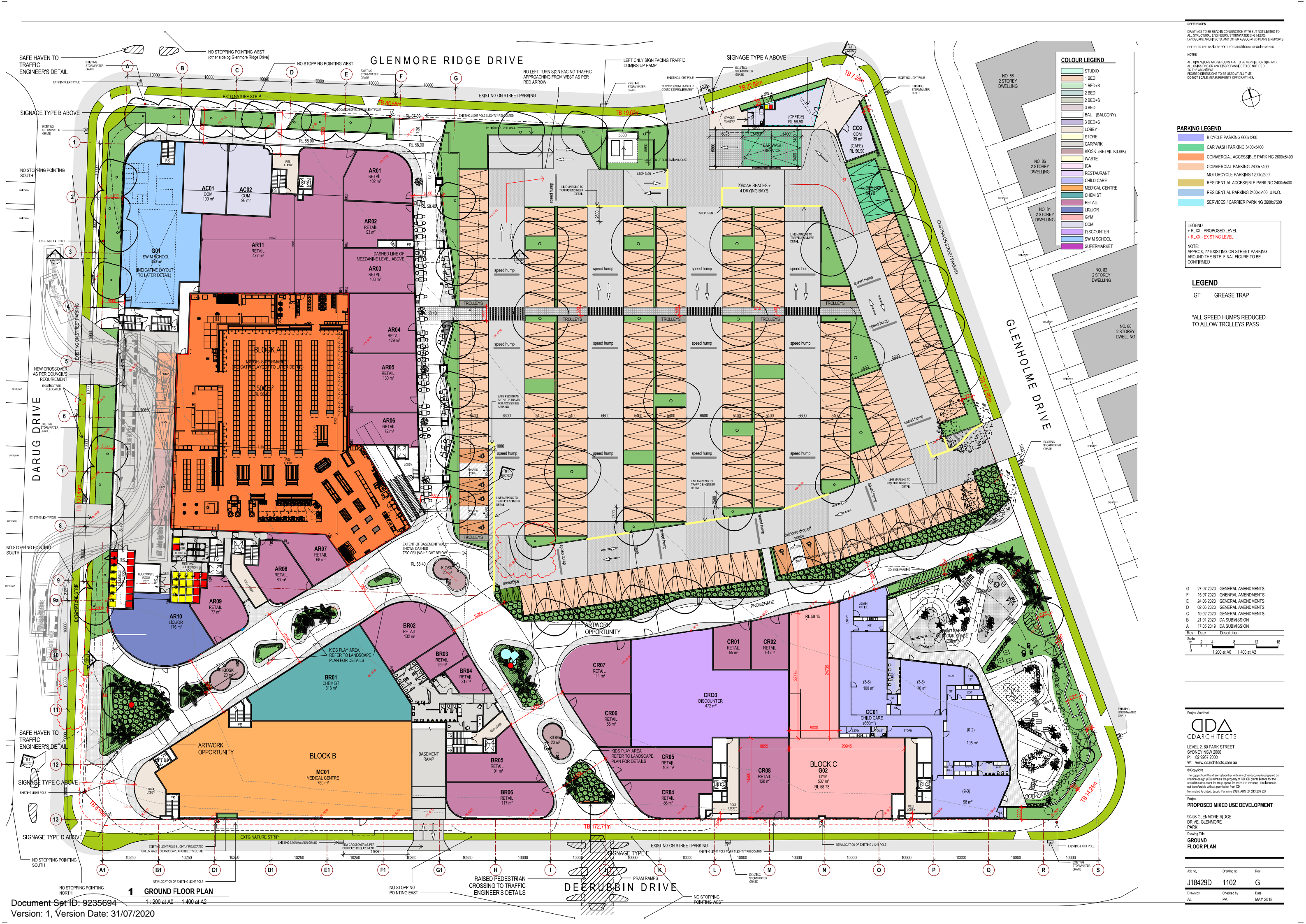
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Notified Architect: Jacob Yarmine 8395, ADRN 24 243 255 327

PROPOSED MIXED USE DEVELOPMENT

50-58 GLENMORE RIDGE DRIVE, GLENMORE PARK
Drawing Title
PART 2 GROUND FLOOR PLAN, BLOCK B

Job No.	Drawing No.	Rev.
J18429D	1202	E
Drawn by	Checked by	Date
AL	Checker	MAY 2018





REFERENCES

Drawings to be read in conjunction with BUT NOT LIMITED TO ALL STRUCTURAL, ENGINEERING, STORMWATER ENGINEERING, LANDSCAPE ARCHITECTS, AND OTHER ASSOCIATED PLANS & REPORTS. REFER TO THE BASIC REPORT FOR ADDITIONAL REQUIREMENTS.

NOTES

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LEGEND

+ RLXX - PROPOSED LEVEL
- RLXX - EXISTING LEVEL

NOTE: APPROX. 77 EXISTING ON-STREET PARKING AROUND THE SITE, FINAL FIGURE TO BE CONFIRMED.

LEGEND

GT GREASE TRAP

*ALL SPEED HUMPS REDUCED TO ALLOW TROLLEYS PASS

G	27.07.2020	GENERAL AMENDMENTS
F	15.07.2020	GENERAL AMENDMENTS
E	24.06.2020	GENERAL AMENDMENTS
D	02.06.2020	GENERAL AMENDMENTS
C	10.02.2020	GENERAL AMENDMENTS
B	21.01.2020	DA SUBMISSION
A	17.05.2019	DA SUBMISSION

Rev. Date Description

Scale
0 2 4 8 12 16
1:200 at A0 1:400 at A2

Project Architect

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Notwithstanding, Jacob Yarmine 8395, ADV 24 243 255 327

Project:

PROPOSED MIXED USE DEVELOPMENT

90-98 GLENMORE RIDGE DRIVE, GLENMORE PARK

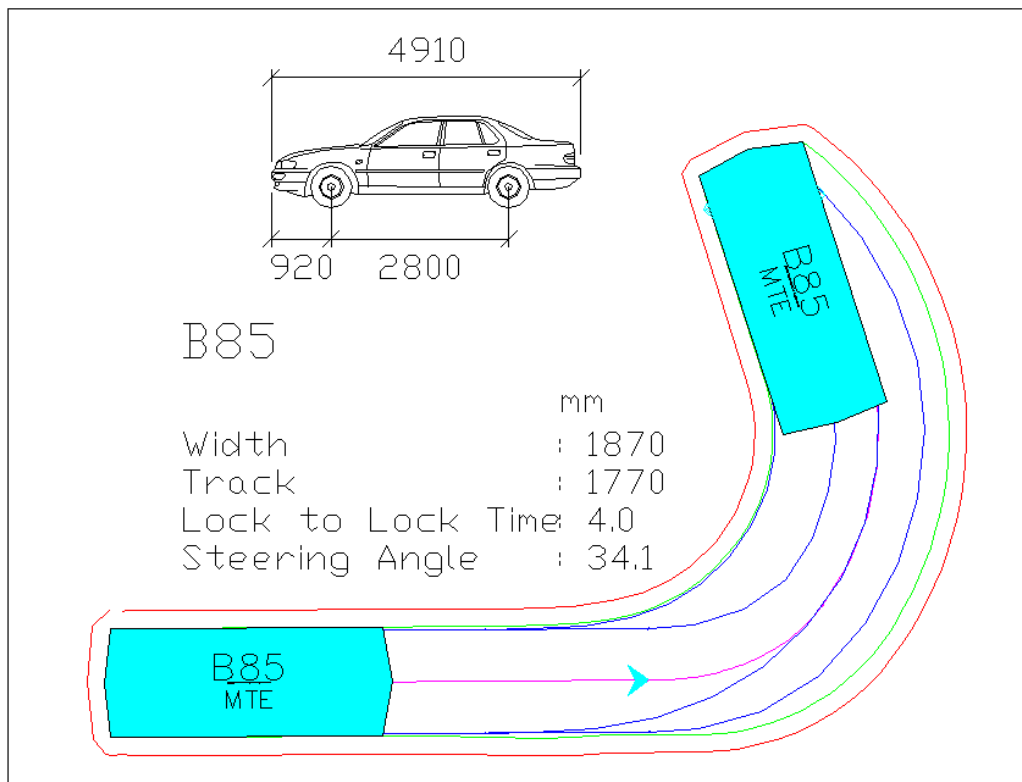
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GROUND FLOOR PLAN

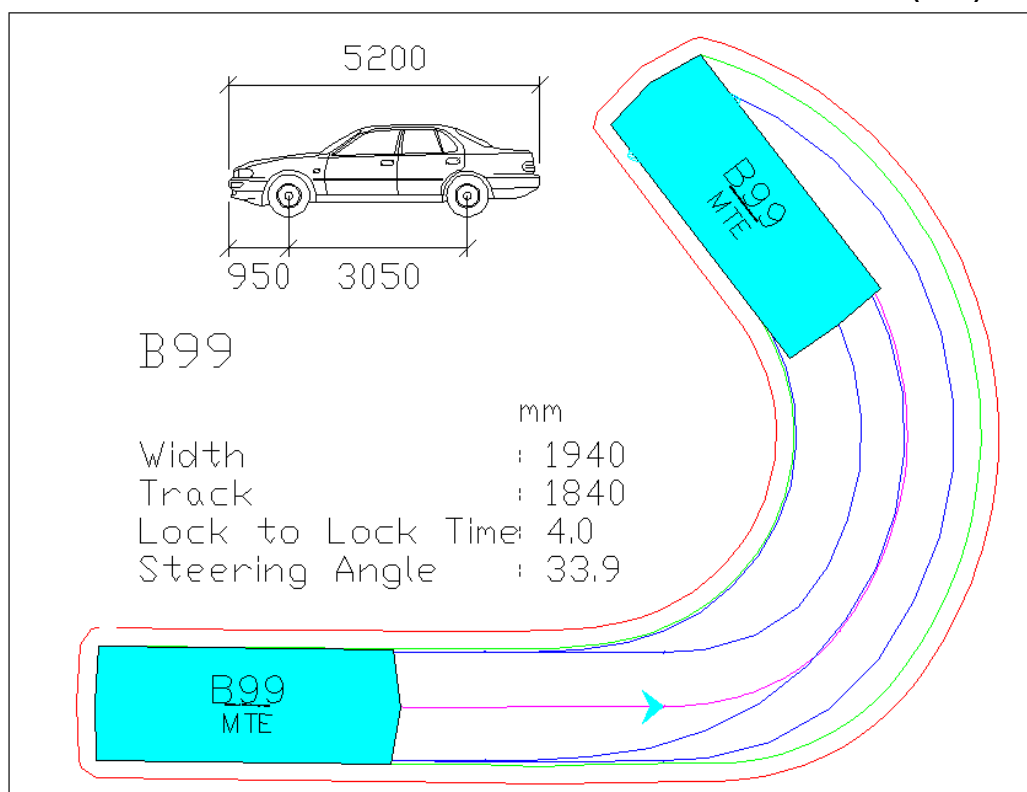
Job No.	Drawing No.	Rev.
J18429D	1102	G
Drawn by	Checked by	Date
AL	PA	MAY 2018



**ANNEXURE B: SWEPT PATH TESTING
(2 SHEETS)**

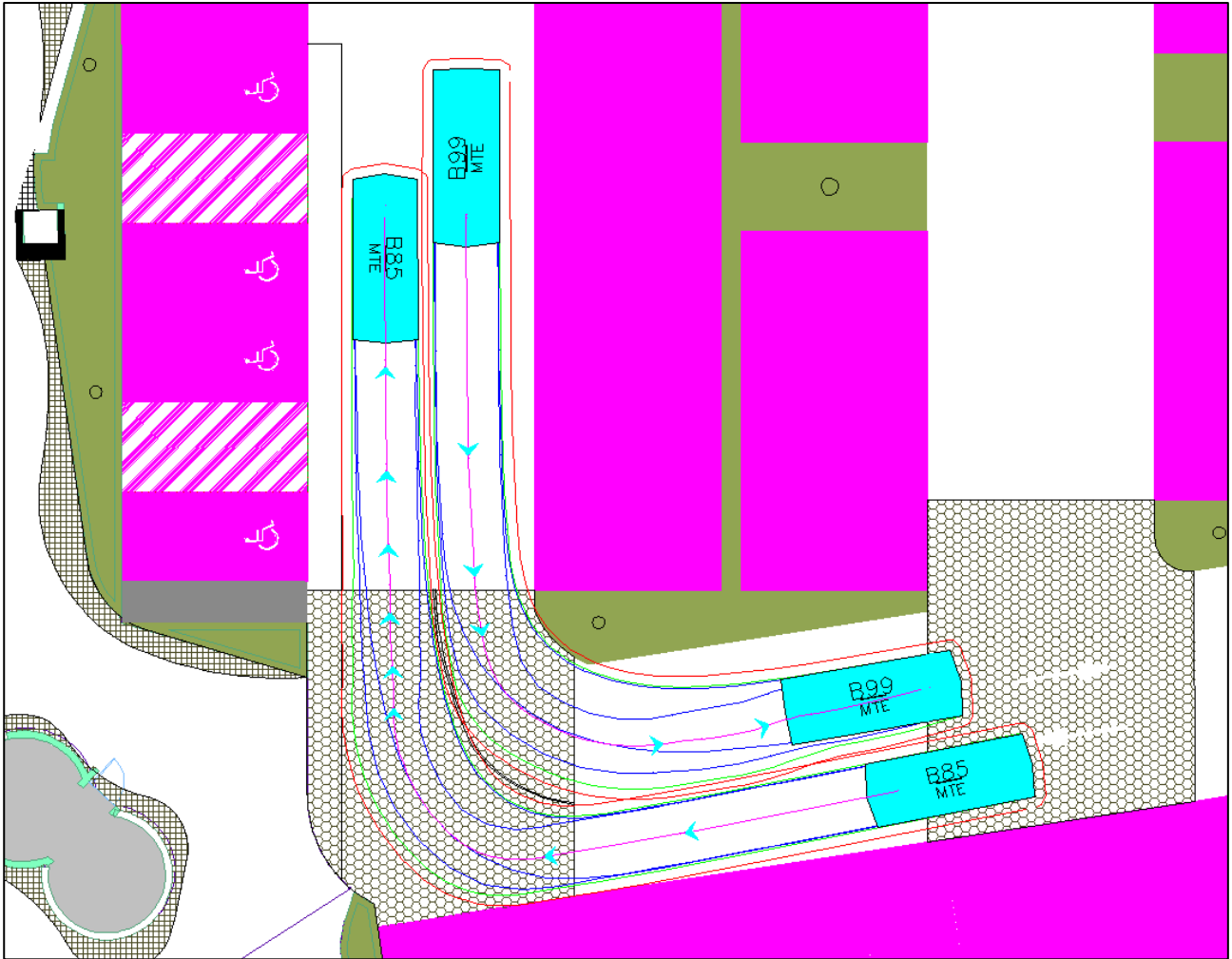


AUSTRALIAN STANDARD 85TH PERCENTILE SIZE VEHICLE (B85)



AUSTRALIAN STANDARD 99.8TH PERCENTILE SIZE VEHICLE (B99)

Blue – Tyre Path
 Green – Vehicle Body
 Red – 300mm Clearance



TWO WAY PASSING AROUND SOUTH-WESTERN BEND ON GROUND LEVEL CAR PARK

Successful – Satisfies Council's Comment.

Subject to low lying landscaping within 300mm of traffic aisle.

Note: Vehicle body and clearance does not enter line-mark pedestrian path.