

15 May 2023

Kate McKinnon  
Senior Case Manager  
Department of Planning and Environment  
84 Crown Street  
Wollongong NSW 2500

**Re: Peer review - Proposed Kingswood apartments and hotel, 180 Great Western Highway and 26 Rodgers Street, Kingswood (DA21/0945)**

Dear Kate,

EMM has been engaged by Department of Planning and Environment (DPE) to undertake a peer review of the proposed mixed used development located at 180 Great Western Highway and 26 Rodgers Street, Kingswood (PPSSWC-214). There are two sites for this development:

- Northern Site: 180 Great Western Highway (GWH), Kingswood
- Southern Site: 26 Rodgers Street, Kingswood

The two sites are separated by Wainwright Lane and both sites have a frontage to Bringelly Road.

The southern site is currently vacant.

The northern site is currently occupied by Kingswood Hotel with an associated car park via Wainwright Lane. The car park currently accommodates eight spaces (including one space dedicated to hotel but no disability parking) . During the site inspection on Saturday, 29 April 2023 at lunchtime, six spaces were occupied (Plate 1.1).



**Plate 1.1 Existing off-street parking for Kingswood Hotel**

# 1 The proposed development

The application seeks demolition of the existing hotel and construct two residential apartment buildings (one building on each site) both with ground floor commercial uses. The southern site will be constructed first. Once completed, Kingswood Hotel will be accommodated to the ground floor of the southern site. Once both the sites are completed, the northern site will contain a new permanent hotel (transfer of the hotel from southern to northern site). Following the transfer of the hotel to the northern site, the temporary hotel on the southern site will revert to a commercial or retail use for permanent basis eg a bottle shop.

In summary, the eight storey building on the northern site (fronting GWH) will contain the following:

- 79 residential units
- 158 m<sup>2</sup> of Bistro
- 294 m<sup>2</sup> of Sports Bar
- 301 m<sup>2</sup> of VIP Lounge
- 162 car spaces (including 2 car wash bays and 4 service vehicle bays)
- 41 bicycle spaces; and
- 6 motorcycle spaces.

The six storey building on the southern site (Rodgers Street) will contain the following:

- 54 residential units
- 603 m<sup>2</sup> bottle shop
- 104 car spaces (including 2 car wash bays and 2 service vehicle bays)
- 19 bicycle spaces; and
- 10 motorcycle spaces.

The Development Application (DA) was submitted to Sydney Western City Planning Panel on 14 December 2021. As part of the approval process, EMM has been engaged by DPE to undertake a peer review of this development application in relation to parking. As such, this peer review specifically addresses the parking related matters, no traffic related assessment is undertaken as part of this peer review.

## 2 Documents reviewed

The following documents have been reviewed as part of this peer review:

- Penrith City Council's DA assessment report
- Traffic Impact Assessment report prepared by ttp, dated 22 November 2021 (ttp reference: 20227)
- A letter prepared by CJP Consulting Engineers in response to Penrith City Council's traffic and parking related issues, dated 22 December 2022 (CJP reference: 22222)
- Statement of Environmental Effects prepared by Hamptons Property Services Pty Ltd dated 6 December 2021
- Penrith City Council's Transport, Access and Parking DCP C10 (2014);
- Transport for NSW (TfNSW) letter dated 9 March 2023 (on behalf of Sydney Trains) and 6 September 2022;
- Hotel Plan of Management dated October 2020; and
- Relevant architectural plans prepared by Squillace, Revision F, dated 25 November 2022.

## 3 Penrith Development Control Plan 2014

Section 10.5 of the Penrith Development Control Plan 2014 (PDCP) provides for parking requirements. The PDCP notes that the requirements have been set "to ensure that development functions efficiently and there is limited impact on street parking and congestion".

Key objectives relevant to this review are noted to be:

- To ensure the provision of an appropriate number of vehicular spaces having regard to the activities present and proposed on the land, the nature of the locality and the intensity of the use
- To facilitate an appropriate level of on-site parking provision to cater for a mix of development types

The development controls set by Council in the PDCP include:

- For any proposed development, Council will require the provision of on-site car parking to a standard appropriate to the intensity of the proposed development as set out in Table C10.2.

Table C10.2 includes numerical parking requirements for various types of land uses.

The PDCP also includes a provision at 10.5.1(C)(4)

*Council has the discretion to waive or reduce the number of car spaces required for a particular site if the reduced provision can be justified in a Traffic Impact Statement, in terms of:*

- Proximity to public transport nodes;*
- Opportunity to share parking with another use; or*
- An empirical assessment of car parking.*

## 4 Outcome of the peer review and recommendations

### 4.1 Southern site (26 Rodgers Street)

#### 4.1.1 Southern site (permanent) parking assessment

The CJP letter has provided updated information of the development yield and its associated car parking calculation based on PDCP C10 (Table C10.2). For reference, the car parking calculation is extracted from the CJP letter.

Table 2 – Car Parking Requirements & Provisions – Southern Site				
Land Use	Yield	DCP Parking Rate	Parking Requirement	Parking Provision
Residential	12 x 1 bed units	1 space/unit	12.0	67 (inc. 2 car wash bays & 2 service bays)
	35 x 2 bed units	1 space/unit	35.0	
	7 x 3 bed units	2 spaces/unit	14.0	
Visitor	54 units	1 space/5 units	10.8	11
Bottle Shop	603m <sup>2</sup>	1 space/30m <sup>2</sup>	20.1	26
<b>Total car parking</b>			<b>91.9</b>	<b>104</b>
Total motorcycle parking			N/A	10
Total bicycle parking			11 resident/staff & 3 customer/visitor	19

Based on the above table, both the ttp TIA and the CJP letter have concluded that the car parking provision to the southern site would exceed the PDCP requirements.

#### [EMM assessment:](#)

##### i Car parking:

It should be noted that there is no rate for bottle shop, hence it is considered reasonable to use the category of Retail Premises Shop (Other neighbourhood and speciality store) and associated parking provisions for the assessment. The car parking rates are correctly applied under the CJP assessment.

However, the Squillace plans attached at the end of CJP letter shows that total 102 spaces will be provided over three levels (26 commercial parking in lower ground level for the bottle shop and remaining 76 spaces in basements 1 and 2). The breakdown of 76 spaces in basements 1 and 2 are provided below:

- Residential – 61 spaces
- Residential visitor – 11 spaces
- Service vehicle – 2 spaces
- Car wash spaces – 2 spaces

The minor discrepancy of parking provision on the southern site should be corrected.

##### ii Loss of on street parking on Rodgers Street

The swept path assessment shown in the CJP letter shows that to facilitate access for a 10.5 m long vehicle to the site, there will be loss of three car parking spaces in Rodgers Street. However, the existing driveway to the site will be reinstated which is approximately 5 m, hence the net loss of parking due to the construction of the southern site will be two spaces.

The net loss of street parking in Rodgers Street is considered to be acceptable given that the facility would exceed council's car parking requirements and further provides for 10 motorcycle spaces. There is no residential frontage where the car parking will be lost. However, a sign plan should be prepared showing the loss of on-street parking on Rodgers Street for consideration of the Local Traffic Committee.

All costs associated with the installation of this signage are to be borne by the developer.

### iii Bicycle parking

The CJP letter states that 14 bicycle spaces will be required (11 resident/staff and 3 customer/visitor) where 19 bicycle spaces are provided for the southern site.

The PDCP does not prescribe any bicycle parking rate. It refers to *Planning Guidelines for Walking and Cycling* (NSW Government 2004). Bicycle parking spaces should comply with AS2890.3:1993 Bicycle Parking Facilities. However, Section 4.6 of the ttp TIA states estimates the bicycle parking calculation based on 20-30% for residents and no spaces for bottle shop staff or visitors.

Section 3 of the PDCP states that bicycle spaces are to be located to provide convenient access from surrounding bicycle routes and main building entrances. It should not interfere with reasonable access to doorways, loading areas, access covers, furniture, services and infrastructure. The spaces are to be adequately lit during periods of use. Adequate signage will be required.

The plans attached at the back of CJP letter shows that eight spaces will be located in basement level 2. Six spaces will be located in basement level 1 and five spaces will be located in the lower ground level, totalling 19 spaces. However, the neither the TIA, nor the CJP letter state how these bicycle spaces will be accessed. If these bicycle spaces are to be accessed by goods lift/s, it should be clearly demonstrated by outlining the size of the lift.

It would be beneficial to allocate some of the bicycle spaces at the ground level, and at a visible location, so that visitors of the premise can identify the facility and park their bike. It is unlikely that any bottle shop visitors will use their bike, however, residential visitors may use their bikes for their allocated spaces. If all bicycle spaces are placed within the basement levels, appropriate signage needs to be installed for the visitors, as required by the PDCP.

The following conditions could be incorporated as part of the development consent, should this development be approved:

- a) Total 19 bicycle spaces to be provided in accordance with AS2890.3:2015 its respective user class.
- b) Adequate lighting should be provided for all secured (Class B) bicycle spaces.
- c) Visitor bicycle spaces (Class C) should be located at a clearly visible location or appropriate signage should be placed by directing its location/s. If bicycle spaces are provided at the ground level for the visitors, it should be weather protected.

### iv Loading dock and waste collection

The Squillace plans at the back of the CJP letter shows that one 12.5 m long Heavy Rigid Vehicle (HRV) turn table is provided at the lower ground level. In addition, two service bays are provided at basement level 1. However, no information is provided in regard to size of this service bays in basement level 1. The plan indicates that it is a standard car park which can only facilitate a small ute or van.

There is no information on waste collection vehicles. It is not specified whether the waste collection would occur by council collection or private contractors.

It appears that the loading dock and waste collection will be co-shared for this development.

It should be noted that Section 5(t) of the PDCP (Design of Parking and Manoeuvring Areas), states that *All loading and unloading areas are to be separated from car parking and waste storage and collection areas and located away from the circulation path of other vehicles.*

The above PDCP requirements have not been met. However, I understand that that small deliveries can be done by utes and vans in the car park. On-street deliveries can be restricted by condition on consent.

For a large scale development it is possible that waste collection and loading deliveries can occur at the same loading dock by adopting an effective Loading Dock Management Plan (LDMP) which could be conditioned as part of the approval.

A LDMP must be approved by council.

#### v Car wash bays

The PDCP requires one car wash bay for every 50 units. For 54 residential units, 2 car wash bays are required.

Two car wash bays are provided in basement level 1. Based on the drawings provide, it was not possible to identify the width of the spaces but it appears to be more than 3.5 m wide, which meets the general requirements of car wash bays.

Appropriate drainage facilities at the car wash bays can be conditioned as part of the development consent.

#### vi Disability parking

Table 4.5 of the ttp TIA describes that a total of seven disability parking spaces will be required. Eight disability parking spaces are provided (6 disability parking for 6 adaptable units and 2 disability parking spaces for the bottle shop). The plan attached with CJP letter shows that there will be 6 disability parking in basement levels 1 and 2.

The provision of disability parking of 7% (8/104) of the total spaces is considered to be adequate. Two disability parking spaces for the bottle shop visitors and residential visitors should cater the likely demand. It is reasonable to assume that residential and bottle shop visitors can share the same disability visitor spaces.

#### vii Motor bike spaces

The PDCP does not specify a motorcycle parking rate. However, five motorcycle spaces are provided in basement level 1 and five motorcycle spaces are provided in basement level 2, totalling 10 spaces. The motorcycle space dimensions meet the requirement of AS2890.1.

#### viii Compliance of parking in accordance with Australian Standards

I could not undertake a full compliance review of the basement car park as I don't have the AutoCAD plan. However, the car park seems to generally compliant with relevant Australian Standard. By reviewing the PDF plans of the basements, I would suggest that the following design issues need to be clarified/resolved:

- The HRV accessing the lower ground level would require a headroom of 4.5 m.
- A swept path assessment should be undertaken at the driveway entrance showing a 10.5 m truck and a B99 vehicle can enter and exit the site simultaneously without impeding each other, so that there is no potential queuing on Rodgers Street.
- A swept path assessment is required at the turn table by showing how a HRV/ council truck will enter and exit the loading dock without any difficulty.
- All visitor spaces which will have a high turnover should be 2.6 m wide.

- Access control (eg boom gates/security gates) – maximum 1:20 (5%) for at least 6 m prior to the control point.

In summary, all car parking spaces should be compliant AS 2980.1, 2890.2 and 2890.6 and this could be a condition of consent. All car parking spaces should be marked for the respective users.

#### 4.1.2 Southern site (temporary) parking assessment

The CJP letter has no information on the southern site (temporary) where Kingswood Hotel will be operational at the ground level while the northern site is constructed. Hence, the car parking calculation is extracted from the ttp TIA and shown below:

**Table 4.3: Temporary Car Parking Requirements for the Hotel Component (Southern Site)**

Land Use	Yield	DCP Parking Rate	Parking Requirement	Parking Provision
Sports Bar	77m <sup>2</sup>	1 space per 4m <sup>2</sup> of bar floor area	19.3	26
Bistro	77m <sup>2</sup>	1 space per 6m <sup>2</sup> lounge and dining room	12.8	
VIP Lounge	169m <sup>2</sup>		28.2	
Bottle Shop	280m <sup>2</sup>	1 space per 30m <sup>2</sup>	9.3	
Total			70	26

The above table shows that total 70 spaces will be required where 26 spaces are provided with a shortfall of approximately 63% of parking. A sports bar, bistro, VIP lounge and small scale bottle shop will be operational within 603 m<sup>2</sup> within the ground floor of the southern site. This facility will be replaced by a large scale bottle shop (whole 603 m<sup>2</sup> area) when both the site areas are operational and Kingwood Hotel is relocated back to the northern site (at its current location).

Section 4.2.2 of the ttp TIA justified the shortfall of 44 spaces by addressing the following parking demand management:

- Responsible drink-driving and carpooling and taxi services
- Encouragement of alternate mode of transport, rather than driving
- Monitor use of on-site parking by staff members; and
- Produce a Transport Access Guide (TAG)

Based on the above measures, the report considered that the parking shortfall on the southern side (temporary) is considered acceptable.

#### EMM assessment:

Penrith City Council's rate has been correctly used. It should be noted that there is no rate for bistro, hence it is reasonable to use the parking rate for 'lounge and dining room' for assessment.

In my professional opinion, the above monitoring and behavioural measures lack certainty and reliability and do not eliminate the risks of negative parking impacts at the adjoining streets. The proponent will have little control on the transport mode of the hotel patrons. No evidence is provided on mode share of comparable hotel.



Even though the proponent will have some control on mode share by the staff members, they can still park at the adjoining local roads eg Rodgers Street. Currently Rodgers Street is signposted to 'Restricted Parking Area; Park in Bays Only', however, there is no parking control signage (Plate 4.1). 'Park in Bays Only' signposting suggests that perhaps the residents along this street are already inconvenienced by long term commuter parking, given the close proximity of Kingswood Station. Areas near train stations where commuters compete for parking can cause local parking displacement and can sometimes result one part of the vehicle encroaching the driveway, effectively blocking the driveway for its use. Any shortfall of parking will worsen the existing parking situation in Rodgers Street and other nearby streets.



**Plate 4.1** Rodgers Street (looking west from Bringelly Road)

Furthermore, no information has been provided on duration of the construction of the northern site. The parking shortfall of 44 spaces may be exacerbated by construction workers parking. Some construction workers will require to drive to the site with their construction plant or equipment. As the Construction Traffic Management Plan (CTMP) has not been prepared yet, it is unknown the construction duration of the northern site, construction personnel in various stages of the development and where they will park. The cumulative impacts combined with shortfall of 44 spaces and construction worker parking for the northern site may have serious detrimental parking impacts to the nearby residential streets eg Rodgers Street, Orth Street, Stanley Crescent, First Street etc which are located within walking distance to the site.

To minimise parking impact during construction of the northern site, the following options could be considered (subject to CTMP satisfactorily demonstrating no parking impact during the construction of the northern site):

- In regard to parking impact, the most desirable option is no temporary operation of Kingwood Hotel at the southern site. This means, full operation of the bottle shop (whole 603 m<sup>2</sup> area on the ground floor), as per permanent southern site operation.
- Allow a lower scale yield of commercial facilities which would not exceed the parking requirement of 26 spaces in accordance with PDCP. The proponent should have the flexibility to choose the yield in accordance with their business plan.
- Council assessment report assumes a maximum of 300 persons for the temporary hotel at the southern site. This number could be proportionately reduced to 110 persons (based on provision of 37% of parking



provision for the temporary hotel). The following conditions could be imposed as part of the development consent:

- The maximum number of persons (including staff, patrons and performers) permitted in the premises at any one time is 110 persons inclusive of patrons outdoors at any one time.
  - The capacity for each area shall not exceed the maximum numbers at any given time.
  - The manager/licensee is responsible for ensuring the number of persons in the premises does not exceed that specified above.
- Some level of shortfall is acceptable if the proponent is willing to operate a free shuttle bus within 5-10 km radius for pick-up and drop-off of the hotel patrons. Similar shuttle services are operational in many hotels, pubs and RSL clubs in Sydney. The operation time, frequency could be conditioned as part of the development consent. I do not have specific information on the level of shortfall of parking that should be permitted, my experience suggests approximately 20% shortfall is considered reasonable. if the proponent seeks more parking shortfall, it should be justified by information on shuttle bus operation of a comparable hotel at a comparable location.

## 4.2 Northern site (180 Great Western Highway)

The CJP letter has provided updated information of the development yield and its associated car parking calculation based on PDCP C10 (Table C10.2). For reference, the car parking calculation is extracted from the CJP letter and presented below.

Table 1 – Car Parking Requirements & Provisions – Northern Site				
Land Use	Yield	DCP Parking Rate	Parking Requirement	Parking Provision
Residential	26 x 1 bed units	1 space/unit	26.0	91 (inc. 2 car wash bays & 4 service bays)
	48 x 2 bed units	1 space/unit	48.0	
	5 x 3 bed units	2 spaces/unit	10.0	
Visitor	79 units	1 space/5 units	16.0	15
Sports Bar	294m <sup>2</sup>	1 space/4m <sup>2</sup> of bar floor area	73.5	56
Bistro	158m <sup>2</sup>	1 space/6m <sup>2</sup> of lounge and dining room	76.5	
VIP Lounge	301m <sup>2</sup>			
Total car parking			250	162
Total motorcycle parking			N/A	6
Total bicycle parking			16 resident/staff & 18 customer/visitor	41

The table shows that 250 spaces are required. There are 162 spaces are provided which is a shortfall of approximately 35%.

Section 4.2.1 of the ttp TIA and CJP letter justified the shortfall of 88 spaces for bar, bistro and VIP lounge area based on the following:

- Following the introduction of the random breath testing, there is in increased awareness of responsible drink driving attitude which resulted increased patrons carpooling or use of taxi/ ride share services
- Findings of the Deloitte study showing carpooling and taxi/ride sharing services resulted responsible behaviour by the pub patrons.
- The visitors of the bar, bistro and VIP lounge areas would comprise of residents and employees in the vicinity of the hotel who will be able to walk to the hotel at lunch time or after work; and

- A parking survey undertaken at Wentworth Hotel in September 2015.

Based on the above justification, both ttp TIA and CJP letter concluded the shortfall of parking is considered acceptable.

#### EMM assessment:

##### **i Car parking:**

The car parking rates are correctly applied within the CJP letter.

The Squillace plans attached with CJP letter provide the following breakdown of 162 spaces across three basement levels:

- Basement level 1 – 53 commercial visitor spaces
- Basement level 2 – 25 residential, 15 residential visitor, 3 hotel staff, 4 service vehicle, 2 car wash, 4 accessible spaces, totalling 53 spaces
- Basement level 3 – 52 residential, 4 accessible, totalling 56 spaces. In addition, 6 motorbike and 44 bike spaces are provided on this level.

#### Assessment of residential component of parking

Based on the CJP car parking calculation, the residents (occupants) of the premises would require 84 spaces whereas 95 spaces are provided which is an oversupply of 11 spaces. However, for the residential visitors, 16 spaces will be required whereas 15 spaces are provided. This is a shortfall of one space. The overallocation of resident parking and the undersupply of visitor parking is often proposed in developments where there is a desire to optimise the value of private parking in the development. The overallocation of resident parking, however, does not 'offset' visitor parking requirements. Hence, in my view, the shortfall of residential visitor parking is not acceptable, notwithstanding that the resident parking for the development has a 13% oversupply of parking spaces.

The facility is located just opposite side of Kingswood train station. Furthermore, bus stops are located on the northern side of Great Western Highway and the eastern side of Bringelly Road. Pedestrian crossing facilities are provided in all approaches of Great Western Highway/ Bringelly Road intersection. Based on the location of the development and its close proximity to public transport accessibility and provision of six motorbike spaces, some reduction of parking may be considered for the residential component with the adoption of car share spaces (eg GoGet).

Research shows one car share space replaces up to six general car spaces. On that note, one and two car share spaces could be considered for the development. However, this discount should not be considered for residential visitors and hotel component of the development as they are unlikely to use public transport facilities or car share vehicles.

#### Assessment of commercial component of parking eg sports bar, bistro and VIP lounge

The CJP car parking calculation breakdown suggests only three spaces are provided to hotel staff. The hotel operation is likely to require more than three staff members. It is unclear where the other staff members will park.

Based on the evidence provided, I do not agree that the introduction of random breath testing can be considered as a basis for reduced parking demand at pubs. It should be noted that random breath testing in

NSW commenced in 1982. The PDCP provisions were adopted in 2014. It is not conceivable that the 2014 PDCP provisions did not already contemplate changes in driver behaviour and parking demand from road traffic changes introduced in 1982. Any reduced parking demand would have manifested itself in the decades since random breath testing was introduced. It is reasonable to assume that it would have been part of the base case when Council determined the parking requirements for “Pubs / Registered Clubs”. It is not considered to be a supplementary or additional factor on which further reductions in parking can be justified.

Similarly, ride sharing services (eg Uber) also commenced before the adoption of the 2014 PDCP.

The ttp TIA also anticipates that visitors to the bar, bistro and VIP lounge areas would primarily be local residents who could walk to the facility. This may be the case but there is no evidence provided in support of this claim.

The ttp TIA draws on an example of the Wentworth Hotel, 193 Great Western Highway, Homebush. Surveys undertaken at the Wentworth Hotel are not reliable as an indication of parking demand at the Kingswood Hotel which is approximately 37 km away and in a different local government area. Furthermore the survey is nearly eight years old, hence parking demand can't be reliably derived from such an old survey.

Noting the above, there is little empirical evidence presented as a basis on which car space provisions should be varied. There is therefore inadequate justification demonstrated in the TIA, based on empirical assessment of car parking, to enable Council to exercise discretion pursuant to park parking requirements.

To achieve a satisfactory parking demand, the following measures could be investigated/ implemented:

- With same development, one component has an oversupply of parking whereas other components have shortage of parking supply. No reasoning or justification has been provided in support of this. Therefore, parking supply should be rearranged with exact number of spaces to be distributed to each land use or activity associated with the development. This would minimise the net shortfall of parking for the northern site.
- More concrete evidence and data on how random breath testing, ride share services could reduce the parking demands for hotels, pubs etc beyond the levels prescribed in the PDCP.
- Allow a lower scale yield of commercial facilities which would not exceed the parking requirement of 56 spaces in accordance with the PDCP. The proponent should have the flexibility to choose the yield in accordance with their business plan.
- The Council assessment report identifies a maximum of 500 persons for the permanent hotel at the northern site. This number could be proportionately reduced to 185 persons (based on provision of 37% of parking provision for the hotel).
- As recommended for the southern site (temporary), some level of shortfall is acceptable if the proponent is willing to operate a free shuttle bus within 5-10 km radius for pick-up and drop-off of the hotel patrons. Further evidence and data of comparable hotel at a comparable location would be required for justification of the discount sought for the hotel component of this development.
- The implementation of the Travel Access Guide (TAG) will be beneficial to hotel staff and at some extent to the residents but the TAG would not guarantee the reduced parking demand for the hotel patrons.

Based on the above assessment, the commercial component of the northern site should be self sufficient of parking, unless facts and empirical evidence are provided for any reduced car parking provision.

## ii Loss of on street parking on Wainwright Lane

The swept path assessment shown in the CJP letter acknowledges that 26 m on-street parking which equates to 4 to 5 spaces will be lost on Wainwright Lane in order to accommodate truck on-site. The letter states that this is a by-product of having on-site loading for a 10.5 m truck and is unavoidable. The letter has concluded that the loss of 4 to 5 spaces in Wainwright Lane is considered acceptable given that the existing hotel has limited on-site parking and there is a likelihood that these on-street parking spaces are currently used by hotel staff and patrons.

I agree with CJP's assessment that due to the narrowness of Wainwright Lane, approximately 5.5 m between kerbs, it is inevitable that there will be some loss of parking at this laneway. However, the net loss of street parking in Wainwright Lane would have considered to be acceptable if the hotel component of the development was to comply the car parking requirement which is not the case. The loss of 4 to 5 on-street parking is another reason why the development should fully comply with the PDCP car parking requirements.

Should the development be approved, a sign plan showing the loss of on street parking on Wainwright Lane should be prepared for consideration of the Local Traffic Committee.

All costs associated with the installation of this signage are to be borne by the developer.

## iii Bicycle parking

CJP letter states that 34 bicycle spaces will be required (16 resident/staff and 18 customer/ visitor) where 41 bicycle spaces are provided for the northern site.

The plans attached with the CJP letter shows that 20 spaces will be located in basement level 3, 10 spaces will be located in basement level 2 and 14 visitor bicycle spaces will be located in basement level 1, totalling 44 spaces. However, the neither the TIA, nor CJP letter state how these bicycle spaces will be accessed. If these bicycle spaces are to be accessed by goods lift/s, it should be clearly documented with the size of the lift.

There will be some benefits of allocating some portion of the total 14 visitor bicycle spaces at the ground level at a visible location so that visitors of the premise can park their bike. It is unlikely that many hotel patrons will use a bike, however, residential visitors may use their bikes. As per the current proposal, if all bicycle spaces are placed within the basement levels, appropriate signage needs to be installed as required by the PDCP.

The following conditions could be incorporated as part of the development consent, should this development be approved:

- a) Total 44 bicycle spaces to be provided in accordance with AS2890.3:2015 its respective user class.
- b) Adequate lighting should be provided for all 30 secured (Class B) bicycle spaces.
- c) 14 visitor bicycle spaces (Class C) should be located at clearly visible location or appropriate signage should be placed by directing its location/s. If bicycle spaces are provided at the ground level for the visitors, it should be weather protected.

## iv Loading dock and waste collection

The Squillace plans with the CJP letter shows that one 12.5 m long HRV will be provided at the ground level which will be accessed to/from Wainwright Lane. In addition, 4 service bays are provided at basement level 2. No information is provided in regard to size of this service bays, however, the plan indicates that it is a standard car park which can only facilitate a small ute or van.

There is no information on waste collection vehicles. However, it appears that loading dock and waste collection will be co-shared at the northern site.

I understand that that small deliveries to be done by utes and vans can occur in the car park. However, no information is provided how one loading dock (HRV) will serve the hotel delivers, and waste collection for the residents and the hotel. Further information is required for justification of one heavy vehicle loading dock serving the entire northern site. This can be documented in the LDMP.

#### v Car wash bays

The PDCP requires one car wash bay for every 50 units. For 79 residential units, two car wash bays are required.

Two car wash bays are provided in basement level 2. I could not determine the width of the spaces but unlike the southern site, the car wash bays appear to be too narrow. A minimum 3.5 m spaces would be required as during the car wash, residents will open their car doors to clean inside.

The minimum width of the car wash bays and appropriate drainage facilities can be conditioned as part of the development consent.

#### vi Disability parking

Table 4.4 of the ttp TIA describes that total nine disability parking spaces will be required where 10 disability parking are provided (eight for adaptable units and two for hotel components). The plan attached at the CJP letter shows that there will be four disability parking in basement level 3, 4 disability parking in basement level 2 and 2 disability parking in basement level 1.

The provision of disability parking of 4% (10/250) of the total spaces is considered to be adequate. Two disability parking for residential visitors should cater the demand for the parking needs for people with disability. It is reasonable to consider that residential and bottle shop visitors may share the same visitor disability spaces.

#### vii Motor bike spaces

The PDCP does not specify a motorcycle parking rate. However, six motor bike spaces are provided in basement level 1. The motorbike spaces dimensions meet the requirement of AS2890.1.

#### viii Compliance of parking in accordance with Australian Standard

I could not undertake a full compliance review of the basement car park as I don't have the AutoCAD plan. However, the car park seems to generally compliant with relevant Australian Standard. By reviewing the PDF plans of the basements, I suggest that the following design issues need to be clarified/resolved:

- The HRV accessing the lower ground level would require a headroom of 4.5 m.
- In the CJP letter, the exit swept path undertaken by a 10.5 m long vehicle from the site to Wainwright Lane needs to be redone as it is not clear how a static vehicle exits the site at an angle from the allocated loading zone.
- A swept path assessment should be undertaken at the driveway entrance showing 10.5 m truck and B99 vehicle can enter and exit the site simultaneously without impeding each other, so that no potential queuing occurs on Wainwright Lane.
- All visitor spaces which will have a high turnover should be 2.6 m wide.
- Access control (eg boom gates/ security gates) – maximum 1:20 (5%) for at least 6 m prior to the control point.

In summary, all car parking spaces should be compliant AS 2980.1, 2890.2 and 2890.6 and this could be a condition of consent.

#### 4.3 15 minute parking on the Great Western Highway

There is an existing 15 minute parking (8.30 am to 6 pm Mon to Fri and 8.30 am to 12.30 pm on Saturday) on Great Western Highway at the site frontage (Plate 4.2). This car parking space is beneficial to short term visitors to the hotel and should be retained for future use of the hotel.



Plate 4.2 Great Western Highway (looking west)



## 5 Matters for further investigation

The matters that are not adequately addressed or need further information/ clarification and their magnitude of impact are summarised in Table 5.1.

**Table 5.1** EMM peer review summary

Item	Site	This letter reference	Matter	Inadequacies and shortcomings	EMM recommendations	Category
1	Southern site (permanent)	Section 4.1.1i	Car parking provision	Minor discrepancy of car parking provision	Car parking provision should be corrected.	Minor
2	Southern site (permanent)	Section 4.1.1ii	Loss of on street parking on Rodgers Street	Signage plan	<p>A sign plan should be prepared showing the loss of on-street parking on Rodgers Street for consideration of the Local Traffic Committee.</p> <p>All costs associated with the installation of this signage are to be borne by the developer.</p>	Minor
3	Southern site (permanent)	Section 4.1.1iii	Bicycle parking	Allocation of bicycle parking	<p>A demonstration on how the bicycle spaces located at the basement level will need to be accessed.</p> <p>The following condition can be imposed in regard to bicycle parking:</p> <ul style="list-style-type: none"><li>• Total 19 bicycle spaces to be provided in accordance with AS2890.3:2015 its respective user class.</li><li>• Adequate lighting should be provided for all secured (Class B) bicycle spaces.</li><li>• Visitor bicycle spaces (Class C) should be located at a clearly visible location or appropriate signage should be placed by directing its location/s. If bicycle spaces are provided at the ground level for the visitors, it should be weather protected.</li></ul>	Major

**Table 5.1**      **EMM peer review summary**

Item	Site	This letter reference	Matter	Inadequacies and shortcomings	EMM recommendations	Category
4	Southern site (permanent)	Section 4.1.1iv	Loading dock and waste collection	A demonstration on how one loading dock and two serve bays for utes and vans are sufficient to serve the residential and bottle shop components of the development.	<p>Preparation of the Loading Dock Management Plan (LDMP) for council's approval.</p> <p>The plan must include the strategy for the management of all servicing of the site including delivery vehicles, waste collection, service vehicles, and others as relevant to the site, and should include information such as vehicle arrivals to the site, the anticipated numbers of arrivals per week, time of day of the arrivals, length of stay, vehicle type etc. along with access arrangement and how these will be managed to prevent disruption to public streets.</p> <p>The management plan needs to include details for all uses of the site including for the set up and pack down of events. This plan should align with the Plan of Management for the site and relevant details, including communication of the plan can be contained in both. The management of the plan needs to be able to respond to changes in the surrounding road environment and be updated accordingly.</p> <p>Once approved, this management plan must be provided to all tenants and external users)</p>	Moderate
5	Southern site (permanent)	Section 4.1.1v	Car wash bays	NA	<p>Recommended condition:</p> <ul style="list-style-type: none"> <li>• The car wash bays must be minimum 3.5 m wide.</li> <li>• Appropriate drainage facilities must be provided for the car wash bays.</li> </ul>	Major
6	Southern site (permanent)	Section 4.1.1viii <b>Error! Reference source not found.</b>	Compliance of off-street car parking in accordance with relevant Australian Standards	Refer to Section 4.1.1viii	<p>All car parking spaces should be marked for its respective users. Visitor spaces (high turnover) should be 2.6 m wide in accordance with Australian Standard AS2890.1.</p> <p>All car parking spaces should be compliant AS 2980.1, 2890.2 and 2890.6 and this could be a condition of consent.</p>	Major

**Table 5.1**      **EMM peer review summary**

Item	Site	This letter reference	Matter	Inadequacies and shortcomings	EMM recommendations	Category
7	Southern site (temporary)	Section 4.1.2	Parking deficiency	Noncompliance of car parking for temporary relocation of Kingswood Hotel	The temporary hotel must provide sufficient onsite parking, unless proper justification and evidence is provided for reduced parking demand.  A cumulative parking impact assessment is required for the operation of the temporary hotel and construction of the northern site (Refer to Section 4.1.2)	Major
8	Northern site	Section 4.2i	Car parking provision	Justification on how three car parking spaces for the hotel staff should be sufficient  Noncompliance of residential visitor parking  Gross deficiency of commercial component of the development	Residential visitor and commercial component of the development must comply with the parking requirement, unless justified by data and empirical evidence (Refer to Section 4.2i)	Major
9	Northern site	Section 4.2ii	Loss of on street parking on Wainwright Lane	Signage plan	A sign plan showing the loss of on street parking on Wainwright Lane should be prepared for consideration of the Local Traffic Committee.  All costs associated with the installation of this signage are to be borne by the developer.	Minor
10	Northern site	Section 4.2iii	Bicycle parking	Allocation of bicycle parking	A demonstration on how the bicycle spaces located at the basement level will need to be accessed.  The following condition can be imposed in regard to bicycle parking: <ul style="list-style-type: none"> <li>• Total 44 bicycle spaces to be provided in accordance with AS2890.3:2015 its respective user class.</li> <li>• Adequate lighting should be provided for all secured (Class B) bicycle spaces.</li> <li>• Visitor bicycle spaces (Class C) should be located at a clearly visible location or appropriate signage should be placed by directing its location/s. If bicycle spaces are provided at the ground level for the visitors, it should be weather protected.</li> </ul>	Major

**Table 5.1**      **EMM peer review summary**

Item	Site	This letter reference	Matter	Inadequacies and shortcomings	EMM recommendations	Category
11	Northern site	Section 4.2iv	Loading dock and waste collection	A demonstration on how only one heavy vehicle loading dock is sufficient for loading deliveries and waste collection is sufficient for the entire northern site.	Refer to Point 4 of this table.	Major
12	Northern site	Section 4.2v	Car wash bays	Noncompliance of the width for car wash bays	Recommended condition: <ul style="list-style-type: none"> <li>• The car wash bays must be minimum 3.5 m wide</li> <li>• Appropriate drainage facilities must be provided for the car wash bays.</li> </ul>	Major
13	Northern site	Section 4.2viii	Compliance of off-street car parking in accordance with relevant Australian Standards	Refer to Section 4.2viii	Refer to point 6 of this table.	Major

## 6 Conclusion/ summary

EMM has been engaged by DPE to undertake a peer review on the onsite car parking provision for the mixed used developments located at 180 Great Western Highway and 26 Rodgers Street, Kingswood.

In principle, there is no adequate evidence or justification of shortfall of parking for the commercial component of the northern site. Furthermore, the parking impacts for the temporary hotel at the southern site during the construction of northern site has been underestimated. In addition, there are some car park compliance issues which need to be resolved. Overall there is not enough justification for council to waive or reduce the number of on-site car spaces, as stipulated in the PDCP.

In principle, parking is in high demand in the area and as such, both the developments should be self-sufficient in provision of onsite parking . Otherwise, there are potential for adverse parking impacts on the adjoining residential streets which would cause amenity issues to nearby residents. The outcome of the peer review is summarised in Table 5.1.

I trust this peer review satisfy the needs of your requirements for determination of the approval of the development, in relation to parking. However, if you have any questions, please don't hesitate to contact me on 0425 478 650.

Yours sincerely



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