

Our Ref: 20227

27 September 2022

Boston Global Level 29, 259 George Street SYDNEY NSW 2000

Attention: Jason Shepherd

Dear Jason,

RE: MEDI-HOTEL DEVELOPMENT 28-32 SOMERSET STREET KINGSWOOD DA22/0326 RESPONSE TO ISSUES – TRAFFIC

As requested, The Transport Planning Partnership (TTPP) has reviewed the requests for information received from Penrith City Council (Council) with respect to traffic and parking aspects of the proposed medi-hotel development at 28-32 Somerset Street Kingswood. Responses to those issues are outlined below.

Background

Development Application DA20/0767 has previously been approved for the site, comprising a 140-room medi-hotel with bar and restaurant, ground floor reception, lounge and dining, and three levels of basement parking for 63 vehicles, with a loading area for a Small Rigid Vehicle (SRV) located on Basement Level 1. TTPP prepared a Traffic Impact Assessment (TIA) for the approved development (23 July 2021).

A new Development Application DA22/0326 has been lodged, which also proposes construction of a 140-key medi-hotel with a wellness retail space, wellness centre and back of house facilities on the ground floor, food and beverage facilities on the sixth floor, basement car parking for 63 cars, and a loading area for an SRV located at ground level. TIPP prepared a TIA for the proposal (31 March 2022), which in consideration of the significant similarities between the proposal and the approved development, focussed on the differences between the approved development and the new development proposal.



Responses to Information Requests

Each of the relevant requests for additional information raised by Council are outlined and discussed below.

The application proposes 63 car parking spaces which does not satisfy the requirement of DCP C10, and the traffic report does not demonstrate that a lower parking rate is justified from surveys of similar sites in similar locations (Western Sydney). Instead, reference is made to the RTA's Guide to Traffic Generating Developments: 3 or 4 star tourist hotels which provides general guidelines for parking rates based on inner Sydney City surveys. This rate is not applicable to Penrith. Similarly, the traffic report reduces the DCP C10 parking rates for ancillary facilities (restaurants, wellness centre, meeting rooms, etc.) via 75%, in which no supporting data has been provided to justify this reduction. As per the Traffic Engineering comments for DA20/0767, the applicant should comply with the parking rates set by DCP C10, or justify lower rates through surveys of similar sites in similar locations (Western Sydney), particularly given the significant parking demand and limited on street availability surrounding the site.

The issue of parking requirements for a medi-hotel was addressed in detail in the July 2021 report, which considered the relevance of the DCP's requirements for hotel and motel developments to medi-hotel accommodation; the requirements of the RTA Guide for medi-hotel accommodation (as suggested by the DCP); parking requirements for medi-hotel developments in similar locations within wider health precincts; and the experience of the proposed medi-hotel operator. While surveys of a comparable development would be informative, TTPP has been unable to identify a comparable medi-hotel in a similar location in Western Sydney in order to provide data to quantify the assumed reduction in overall parking demand due to the high levels of guests and locals (such as hospital workers) being users of the ancillary facilities.

The proposed ancillary facilities are small scale and directly related to the medi-hotel operations, providing food and beverage facilities, a wellness centre and associated retail space. Direct application of each of the DCP rates in full for each of the other ancillary facilities at the proposed medi-hotel would assume that each of the proposed ancillary facilities is a standalone operation, with all customers and staff being drawn from outside the site. Furthermore, it would imply that the peak parking demands of all the standalone uses would need to be met simultaneously, which doesn't take into account that a user of one of the ancillary areas may also be a user of another ancillary area on the same visit, e.g., a customer of the wellness centre may also be a customer of the wellness retail on the same visit.

As stated in the March 2022 TIA report, the reduction in peak parking demand was based on the assumptions that at the time of peak cumulative parking demand, half of all ancillary uses patrons/customers may not be guests of the medi-hotel, and half of the non-guest users of the ancillary facilities are not local residents/workers. These are the same assumptions that



were applied when considering the cumulative parking demand of the approved development.

TTPP has since been advised by the operator that the wellness centre would only be accessible to guests of the medi-hotel. As the wellness retail would be coupled with the wellness centre, TTPP considers that it is highly unlikely that any retail customers would be drawn from outside of the medi-hotel. On this basis, the wellness centre and retail would generate no additional demand for parking.

The food and beverage areas would form an integral component of the medi-hotel operations, providing a dedicated dining area for hotel guests. The nature of the facilities is expected to reflect that, rather than being a destination restaurant serving the wider community. This is also suggested by its location on the upper floor of the development, where it is less likely to generate patrons from exposure to the street, as may be expected at a traditional standalone restaurant. Its proximity to the hospital precinct may attract some hospital staff and visitors, who would not typically drive a car to the site having already travelled to the hospital.

The accessible spaces 38 and 58 must be in accordance with AS 2890.6 and feature a shared space and bollard. Accessible spaces should be co-located to basement level 1 with spaces positioned as near as possible to the passenger lifts.

In the March 2022 TIA report, TTPP acknowledges that these spaces do not comply with the requirements of AS2890.6 for spaces for people with a disability. It is understood that the access consultant has reviewed these spaces with respect to their geometry and location and advised that a performance-based approach demonstrates compliance with the relevant performance provisions of the BCA. TTPP also notes that the layout exceeds the requirements of AS2890.6 for New Zealand, confirming that the spaces are functional and fit for purpose despite not meeting the layout requirements specific for Australia.

The proposed use of two on-street parking spaces for taxi drop off/pick up is not supported and is unlikely to be endorsed by Council's Local Traffic Committee. This should be provided on site such as via a porte cochere arrangement, not within the road reserve.

The proposed provision of two on-street parking spaces for drop off and pick up activity is consistent with that of the approved development. "No Parking" restrictions would allow their use by the public for drop off and pick up activity, thus they would serve not only the proposed development but the wider precinct. The two "No Parking" spaces would be in addition to the existing longer-stay kerbside parking, making use of the additional kerb space available with the removal of redundant driveways on Somerset Street.



Council's DCP notes that porte cocheres are not preferred due to adverse impacts on urban design, streetscape and pedestrian amenity.

Visitor bicycle parking spaces shall be weather protected as per AS 2890.3 Bicycle Parking Facilities and the recommendations of the traffic report.

In the TIAs for the approved and proposed developments, TTPP indicated that it would be appropriate to provide weather protection for the visitor bicycle spaces. It is understood that provision of a roofed structure over the visitor bicycle spaces has been investigated, however it has raised urban design concerns due to the location within the landscaped setback. The operator has indicated that weather protection of the visitor bicycle spaces can be provided via the provision of bicycle covers by hotel management when required.

The RTA's Guide to Traffic Generating Developments suggests the provision of service vehicle bays at 1 space per 100 rooms. As such, two service vehicle bays/servicing areas are recommended for this development.

The provision of a single loading bay suitable for a SRV is consistent with the approved development. The medi-hotel and ancillary facilities would all be managed by the same operator. This would allow for management and scheduling of use of the loading dock for the development as a whole, maximising the efficiency of the space and removing the need to provide additional loading space to accommodate unexpected servicing requirements. The proposed provision of one loading space is expected to accommodate the anticipated heavy vehicle demands for the site, as required by Council's DCP.

The applicant proposes only access for a 6.4m small rigid vehicle is required to service the development, which is not in accordance with the PCC Industrial, Commercial and Mixed - Use Waste Management Guidelines, and DCP C10. It is recommended this matter is referred to Waste Services noting Council's typical waste collection vehicle is 10.5m long.

The provision of a dedicated loading bay suitable for a SRV is consistent with the approved development, and with that approved by Council for the serviced apartment development at 10-12 Hargrave Street. The medi-hotel and ancillary facilities would all be managed by the same operator, and suppliers would be informed of the maximum vehicle size permitted in the loading bay, to ensure no oversize vehicles service the development. Waste collection would take place using a contractor with an appropriately sized vehicle.



The proposed loading area requires reversing within the carpark/circulation roadway area. This presents is a safety concern and may create conflict between servicing operations and visitors/staff, thus should not be supported. Manoeuvring of heavy vehicles should be contained outside of the circulation roadway access.

While it is generally preferred that heavy vehicle and general public access be completely separated, the proposed layout is not considered to present a significant safety concern, and has improved sight lines compared with the approved layout with the loading dock on Basement Level 1.

As demonstrated below (from the March 2022 TIA), the proposed layout requires an SRV accessing the loading bay to enter the site in a forward direction, travel on the driveway to a point just past the loading bay before reversing into the loading bay. Before performing the reverse manoeuvre, the driver of the SRV would have adequate sight distance along the driveway to ensure there is no conflict with an exiting vehicle. There is adequate space for the entering SRV to wait clear of any vehicle exiting the basement before performing the reverse manoeuvre.



The driver of any vehicle entering the driveway behind the SRV would have a clear sight line to the SRV before and during the reversing manoeuvre, and there is adequate space for a car to wait in the driveway between the boundary and the loading dock, completely clear of the reversing SRV and the footpath on Hargrave Street. If required, signage and/or linemarking may be implemented on the driveway before the loading dock to advise car drivers to "stop here if truck reversing ahead".



There are no pedestrian routes in the path of the reversing SRV that would raise any concerns about potential conflicts between pedestrians and the SRV.

As the loading area would be under the management of the operator, appropriate truck driver behaviour could be encouraged as part of a Loading Dock Management Plan, which may be required as a Condition of Consent by Council.

Swept path plans should be provided demonstrating access to critical parking spaces and simultaneous manoeuvring about bends within the parking aisles/circulation roadways.

A copy of the review of the car park including swept paths is attached.

The proposed location of the loading area requires the reversing of a small rigid vehicle within the access driveway for the basement carpark. This presents a safety concern and may create conflict between servicing operations and visitors/staff entering and exiting the basement carpark, thus it is not supported. The manoeuvring of heavy vehicles should be designed to be separated from the visitors/staff access roadway in to the basement carpark.

Refer to earlier response.

The architectural drawings of the basement carpark show a structural column located in the middle of the access roadway across from the staircase. This column may cause difficulty for vehicles entering and exiting the basement carpark. A swept path is required to demonstrate that vehicles are able to manoeuvre around this column while entering and exiting the basement and from the parking spaces no. 1, 20 and 40.

Refer to earlier response, the requested swept paths around the column are included in the attached review of the car park.

The parallel parking spaces no. 39 and 63 should be a minimum of 6.5m long in accordance with AS 2890.1 and the disability parking spaces should be a minimum of 2.4m with an adjoining 2.4m wide shared area as per AS 2890.6 and the recommendation of the applicant's traffic engineer, TTPP. The designs should be adjusted accordingly with dimensions provided on the drawings.

The parallel parking spaces meet the requirements of AS 2890.1, being shown on the plans as 5.9m long with 450mm clearance to obstructions on each end, i.e., 6.8m long.

Refer to previous response regarding the disabled parking spaces.



The aisle width in the basement is to be detailed on the drawings. The aisle width is to be clear of any kerb or structure.

Aisle widths will be detailed on the drawings.

Visitors bicycle parking spaces shall be weather protected as per AS 2890.3 and the recommendation of the applicant's traffic engineer, TTPP.

Refer to earlier response.

A 1m wide splay should be provided to the vehicular crossing at the western edge to better the entry path of cars, particularly while another car is existing the property.

A 1m wide splay can be provided.

We trust the above is to your satisfaction. Should you have any queries regarding the above or require further information, please do not hesitate to contact the undersigned on 8437 7800.

Yours sincerely,

Matton.

Penny Dalton Associate Director

Attachment - Car Park Review (File 20227CAD022-220328-CAR PARK REVIEW-13.pdf)













	DWG No. 20227CAD022 FIGURE 6 DATE STAMP 28 MARCH 2022		
	PROJECT №. 20227	scale 1:200 @A3	rev. A













