

## RA23/1002 Berry Hotel - Invalid parking rate calculation

### **Future Parking Demands** (Page 7 of Traffix September Statement)

*SDCP Chapter G21 Section 5.1 provides a parking rate for pubs/registered club at 1 space per 5m<sup>2</sup> of LFA. However, it also states that alternatively, car parking requirements may be determined by Council following the completion and submission of a parking impact and needs study by an independent suitably qualified professional.*

*Therefore, the opportunity has been taken to conduct a parking impact and needs study based on surveys of the existing (approved) development to derive a site-specific parking rate which can be applied to the additional future Pub LFA.*

*This approach is also in accordance with TfNSW Guidelines given that parking surveys of the existing site provides a site-specific parking rate.*

### **TfNSW Guidelines**

The RTA Guide to Traffic generating Developments was published in 2002 and the TfNSW Transport impact Assessment has just been published. The extracts below from the two documents show that the approach adopted by Traffix does **not** accord with TfNSW Guidelines.

#### *Traffic for NSW – Guide to Transport Impact Assessment 2024 (updating 2002 Guide)*

*Registered clubs - The number of parking spaces should be **based on the characteristics of the proposed development and comparisons should be drawn with similar clubs**. The determination should consider the peak demand time of the various activities within the development. Parking should satisfy the development's peak cumulative parking requirements as a whole, by superimposing the parking demand for each activity*

#### *RTA - Guide to Traffic generating Developments 2002*

*Off-street car parking must be provided to satisfy the average maximum demand.*

*Research has indicated the **demand for parking varies substantially depending on the type of club and cannot readily be related to building floor areas**. The determination of the number of parking spaces required is therefore based on the characteristics of the proposed development. Comparisons must be drawn with similar clubs.*

### **Traffix calculation of a site-specific parking rate for the Pub**

Two surveys were conducted using a travel mode questionnaire to establish the maximum percentage of patrons who had driven to the Pub and parked onsite.

- In two surveys conducted on 13/14 April that figure was 26.7%, based on 122 patrons.
- The Traffix report stated, "*parking demand in relation to the existing Pub is for **33 spaces based on the surveys. The existing development comprises 660m<sup>2</sup> of Pub LFA. Therefore, the parking rate in relation to the existing Pub is one space per 20m<sup>2</sup> of LFA.***"
- The 33 spaces required for the existing Pub is 25 more than the 8 spaces available.
- This parking rate was then applied to the additional 381m<sup>2</sup> of LFA (58%) to claim only **19** additional parking spaces would be required and a total of **52** for the whole pub.

## Fundamental flaw in the logic of the calculation for the Pub parking

The calculation can only apply to a business intending to expand its floor area by 58%, with no changes to its business model. Hence, the current 122 maximum number of pub patrons would also expand by 58% to 192, and the parking spaces required to 52 – resulting in a **shortfall of 20 spaces**.

However, the proponents intend to recover their substantial investment in the Pub by implementing an aggressive business growth model based on discounted drinks and meals, which will increase the pub capacity to 450 patrons, an increase of 270%. Based on the 26.7% parking rate, a total of 120 spaces would be required – resulting in a **shortfall of 88 spaces**.

Both the above calculations are invalid however as they do not comply with TfNSW Guidelines.

The SDCP requirement of 1 space per 5m<sup>2</sup> of LFA should be used, and due to the far more intensive use planned for the whole Pub, the requirement must be applied to the total LFA of 1,041m<sup>2</sup>. A total of 208 spaces would be required – resulting in a **shortfall of 176 spaces**.

The DA states that the Berry Hotel seeks to continue appealing to tourists, and therefore it would not be unreasonable to assume that the proportion of patrons accessing the Pub by car during busy periods would exceed 26.7%, thereby **making the shortfall of spaces even greater**.

The 32 spaces (out of the total of 67) proposed for the Pub would not even cover the 33 required for the existing Pub LFA.

## Parking Credits

SDCP Ch G21 Cl 5.2.1 states – “sites with an existing development **may, in some circumstances, benefit from a parking credit – subject to assessment**” and “depending on the nature of the application”.

However, the nature of the application is not just ‘alterations and additions’, it is a substantial redevelopment of the site and the implementation of an aggressive business growth model that will expand capacity from 120 to 450 patrons. These circumstances dictate that a parking credit would not be permitted.

	Existing	Survey parking rate		Patrons	DCP rate	Proposed
No. of Pub patrons		122	+70	192	450	450
Licensed floor area	660m <sup>2</sup>	660m <sup>2</sup>	+381m <sup>2</sup>	1041m <sup>2</sup>	1041m <sup>2</sup>	1041m <sup>2</sup>
<b>Parking:</b>						
Pub	8	33	+19	52	120	32
Staff	1	1	+3	4	4	4
Accommodation	14	14	+17	31	31	31
<b>Total</b>	<b>23</b>	<b>48</b>	<b>+39</b>	<b>87</b>	<b>155</b>	<b>67</b>
<b>Parking Shortfall</b>				<b>-20</b>	<b>-88</b>	<b>-176</b>

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