

Ref: 22034|BNW

1 February 2022

Mr Fabian Barone
Future Urban
Level 1, 74 Pirie Street
ADELAIDE SA 5000

Dear Fabian,

RYMILL HOUSE - PROPOSED FUNCTION AREA 100 EAST TERRACE, ADELAIDE

I refer to the proposed function area at Rymill House, 100 East Terrace, Adelaide. As requested, I have undertaken a review of traffic and parking aspects of the proposal.

In preparing this review, I have reviewed the development application, including the proposed site layout plans, the URPS planning statement, the heritage impact statement prepared by Stevens Architects and the traffic and parking letter prepared by Ms Melissa Mellen of MFY. I have also undertaken an inspection of the road network surrounding the site.

THE PROPOSAL

Based on application documents, I understand that the proposal comprises the construction of a new 246 m² floor area function facility at the subject site. The existing building ('Rymill House') will be retained as a dwelling (i.e. its current use). No operating hours for the function facility are identified in the development application documents.

The application documents identify a variety of capacities for the proposed facility. Specifically, the architectural plans identify various layout modes with up to 144 patrons and the URPS planning statement identifies the facility could accommodate 168 seated and 336 people standing (it is unclear whether these are mutually exclusive, albeit based on the facility's proposed floor area it is assumed 336 patrons is the maximum physical capacity). Nevertheless, I note the URPS statement also indicates a maximum of 225 patrons is proposed. I also note that the MFY assessment makes no mention of the patronage associated with the facility. For the purposes of my assessment, I have assumed the site capacity is 225 patrons as noted by URPS.

The proposal will utilise the site's existing vehicular access points, namely separate ingress and egress points on East Terrace. A total of four parking spaces are proposed to be provided within a new carport structure. The MFY letter notes that the proposed parking arrangement will not fully conform with the relevant Australian Standard (AS/NZS 2890.1:2004) but that additional width will be provided within the parking spaces. I concur that such an approach is reasonable to meet the intent of the Standards and accommodate manoeuvres into and out of the spaces.

I understand that all of the four parking spaces will be assigned to residents of the dwelling and that none will be provided for the function facility. No other parking spaces are proposed within the site to accommodate any parking demands associated with the function facility.

Pedestrian access will be via the property's exiting pedestrian gate on Hutt Street. The MFY letter identifies that pedestrian access for patrons of the function facility will only be via this gate.

PARKING PROVISION

As noted above, the four parking spaces proposed within the site will be assigned wholly to the existing dwelling and no spaces are proposed on-site to accommodate any parking demands associated with the function facility. The number of spaces associated with the dwelling is considered appropriate (and in line with the requirements of the Planning and Design Code). However, I have further reviewed the requirements of the Code in respect to parking requirements associated with the function facility (given the lack of on-site provision associated with it).

The Planning and Design Code's General Development Policies – Transport, Access and Parking DTS/DPF 5.1 criteria requires that *"Development provides a number of car parking spaces on-site at a rate no less than the amount calculated using ... Transport, Access and Parking Table 2 - Off-Street Vehicle Parking Requirements in Designated Areas..."* (my emphasis). The associated Table 2 identifies a minimum parking provision rate of 3 spaces per 100 m² of gross leasable floor area for non-residential development (excluding tourist accommodation). Such a rate is applicable to the proposed function facility for assessment against the DTS/DPF criteria.

Based on the advised gross leasable floor area of 246 m², this would equate to a minimum requirement of 7.38 spaces. I note that Ms Mellen's assessment has rounded this requirement down, however, it is typical industry practice to round up minimum parking requirements. On this basis, there would be a requirement for at least 8 parking spaces for the function component to meet the DTS criteria. The proposal clearly does not meet this requirement.

In lieu of meeting the DTS criteria, it is therefore relevant to consider the associated Performance Objective (5.1) of the Code (as I acknowledge MFY has also done) which states that:

"Sufficient on-site vehicle parking and specifically marked accessible car parking places are provided to meet the needs of the development or land use having regard to factors that may support a reduced on-site rate such as:

- (a) availability of on-street car parking*
- (b) shared use of other parking areas*
- (c) in relation to a mixed-use development, where the hours of operation of commercial activities complement the residential use of the site, the provision of vehicle parking may be shared*
- (d) the adaptive reuse of a State or Local Heritage Place."* (my emphases)

Notably, PO 5.1 does not refer to the Table 2 rates but rather seeks that the parking provision meet the needs of the development or land use. Accordingly, it would be appropriate to undertake a realistic assessment of parking demands associated with such a function facility to enable sufficient consideration of potential impacts of the proposal. In my view, this is particularly important given that no on-site parking is proposed for the function facility with all parking demand required to be accommodated elsewhere. I would suggest that Council seek further clarification in respect to the realistic parking 'needs' of the development from the applicant. Noting the capacity for up to 225 attendees, realistic peak parking demands (including patron, staff and taxi/Uber vehicles) would be higher than the 8-space requirement identified by application of the DTS criteria.

In respect to the accommodation of realistic demands on-street, I note that Ms Mellen states that *"...there is available on-street parking during periods when functions at the site are most likely to occur..."*. However, as above, Ms Mellen has provided no quantification of likely demands associated with the function facility nor provided any quantification (survey data) of the availability of spaces surrounding the site.

Noting that no operating hours have been identified, there is clear potential for functions (such as business lunches, seminars, product launches etc.) to be held during typical business hours. I also highlight that Ms Mellen has stated that parking spaces in Hutt Street, East Terrace and Flinders Street East are *"...in high demand during weekday periods..."*. If day-time use of the function facility is proposed, demonstration of the capacity of on-street parking to accommodate a realistic demand should be provided by the applicant.

It is also pertinent to note that parking restrictions apply on the adjacent streets during typical week-day business hours (primarily two-hour restrictions) and, in some sections, on Saturdays. Functions over two hours in length, would require that attendees who have driven either need to 'shift' their vehicle or over-stay the permitted time. This would also apply to function staff who are required to park on-street.

Ms Mellen has also noted the adaptive reuse of the State Heritage Place as justification for the lack of any on-site parking provision for the function facility. However, my understanding is that the State Heritage Place comprises the dwelling (building) itself as well as the southern and western boundary walls. The proposed function facility is a new building and does not appear to comprise a reuse of the State Heritage Place (this would be best confirmed by a planner or planning lawyer). Furthermore, the dwelling itself does not entirely prevent the provision of additional parking within the site (the heritage impact report notes that the building's surrounds have been utilised for parking over the years).

Ms Mellen states that the *"Provision of a small number of visitor spaces would create circulation within the driveway (where visitors would enter and exit the site due to spaces being fully occupied)"*. However, on-site spaces could easily be designated for function staff (caterers, DJ etc.) and/or "VIPs" associated with the function (i.e. an attendee who can be advised they have a designated space on-site for the event with general attendees advised to park off site). This would minimise (or prevent) the circulation issues Ms Mellen has suggested could occur. Similarly, the proposal provides no on-site accessible parking for persons with disabilities which is sought by Performance Objective 5.1.

In addition to parking for staff and patron vehicles, I acknowledge that a proportion of attendees would likely arrive by other means. This would likely include taxis/car share (Uber) vehicles that will need to be stored on-street when dropping off or picking up passengers associated with the site. The quantity of such vehicles nor associated impact on traffic and parking conditions does not appear to have been considered by MFY. Similarly, for some types of functions (such as weddings), private charter buses could be expected to be utilised for access to and from the site. MFY has provided no assessment of the ability of such vehicles to be safely stored on the adjacent roads. Changes to parking controls in the vicinity of the site may be needed to appropriately accommodate such vehicles and minimise impacts on other road users and property occupants.

SUMMARY

The MFY letter suggests that the requirement for all function related parking to be accommodated off-site (on-street) is *"...the optimal solution for the project..."*. However, given the lack of quantification of realistic demands, on-street parking availability nor operating hours, the proposal does not appear to provide an 'optimal solution' for other road users nor neighbouring property owners/occupants (and potentially function staff and patrons). In my view, further assessment and justification of parking conditions (and any associated traffic impacts) is warranted and, desirably, additional parking provision be accommodated on-site.

Please feel free to contact me on (08) 7078 1801 should you require any additional information.

Yours sincerely,



BEN WILSON

Director | CIRQA Pty Ltd