

## **Griffith Narrabundah Community Association Inc.**

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### **Comments on DA 201833731, Blocks 3 and 4 Section 96 Griffith**

The Griffith Narrabundah Community Association (GNCA), which has over 300 members, welcomes the opportunity to provide comments on this Development Application.

We are disappointed that such a significant development is being processed without the Master Plan for Manuka in place, as promised by the Chief Minister in September 2016. The proposed development and the one anticipated for the re-development of Block 2 Section 96 Griffith are at the heart of Manuka.

What is being proposed, if built, will have a lasting and significant effect on the future of the Manuka Precinct. It would therefore have been opportune to consider whether this development could pave the way, for example, for a new shared pedestrian/vehicle zone in Franklin Street between Flinders Way and Furneaux Street, which could contribute to a rejuvenated Manuka. Unfortunately, it appears to be yet another *ad hoc* development, which will be assessed without the guidance of a Master Plan.

The proponent and project team presented the proposal to the EPSD Design Review Panel in March 2018 and we understand that the panel included the ACT Government Architect and the NCA Chief Planner. We are thus also disappointed that there was no consultation with the community or the Manuka traders before DA 201833731 was released to the public for comment, particularly as the Capitol Hotel is destined to be a part of a much larger re-development that will include Block 2 of Section 96 Griffith.

The second stage of re-developing Section 96 is obviously a key component of a larger package and we would have thought that this should be presented for pre-DA consultation, even if it is only at the formative stage. A Master Plan would have been very helpful.

Essentially the GNCA supports the basic concept of a small hotel complex being built on this site. However, we have serious concerns over parking and traffic issues. Until changes are made to address these concerns we recommend that the Application should not be approved.

## **Parking after building completion**

There are three main flaws in the parking analysis outlined in the Application.

The first is that there are too few parking places in the basement. The calculations on page five of the Northrop assessment conclude that 59 spaces are needed. These estimates comply with the requirements of Section 2.2.4 of the Parking and Vehicular Access General Code. However, four more spaces should be added to cater for disabled parking and motor cycles. The estimated area of the restaurant appears to be too low so more spaces may have to be added. Consequently, there should be a minimum of 63 parking places on site.

These numbers are consistent with those available at the nearby East Hotel, where there are 140 rooms and 140 parking spaces. Even with 140 spaces, there are still significant parking issues near East Hotel at around 8 pm on several evenings, when the underground spaces are fully occupied.

Fifteen spaces in the basement are therefore not enough. To suggest that all the overflow vehicles can park in the multi-storey car park 200 metres away is unsatisfactory and not suitable for hotel guests, restaurant owners, staff or patrons. Use of the multi-storey car park in Furneaux Street will also deny regular patrons of Manuka business establishments the ability to shop, dine and do business at Manuka.

The proposed under-provision of on-site hotel parking is presumably linked to the hotel owner's related ownership of the multi-storey car park. But no account is taken of the possibility that a different future owner of the hotel will not be able to make arrangements for hotel guests to park in the multi-storey car park. Approval of the present proposal would not be in the long-term public interest and would be bad planning policy.

The second flaw is the assumption on page 7 that "the removal of the existing restaurant will free up the parking that was previously occupied by users of this facility". The restaurant has been closed and boarded-up for over a year and therefore has not had any patrons seeking parking places during that period. To argue that the demolition of a facility that is not being used will free-up more parking spaces is just not correct. In fact, the proposal removes 8 parking spaces for cars and 5 for motorcycles from Flinders Way. These 13 spaces should be added to the 59 in the Northrop Report and the 4 needed for disabled and motor cycle spaces. In total, there should be 76 parking spaces on site.

Provision of more car parking spaces should benefit both the owner of the hotel and the ACT Government. Significant demand for parking during sporting events at Manuka Oval could be more easily accommodated if the hotel was able to provide additional parking spaces.

The third flaw is that there is no indication of the parking requirements for Stage two of the re-development of Section 96. This will also require parking facilities. Until this information is provided, the hotel proposal should incorporate sufficient car parking space for it to be self-sufficient and not reliant on a car park that is 200 metres away in Furneaux Street. A more holistic assessment of the proposal is highly desirable.

Consequently, it is essential that more parking spaces are provided in the basement of the hotel. There is no excuse for a hotel to avoid providing parking under the building for its staff and guests. It would be simply shifting the demand for parking onto other sites, including surrounding streets. We may end up with the sort of parking problems that we see in Civic and Kingston because developers are not forced to provide adequate on-site parking.

## Parking during construction

Northrop's Traffic and Parking Statement does not address the issue of parking facilities for the construction workers while the hotel is being built. It would be unconscionable for Manuka business establishments to be adversely affected during the construction period. Before the Application is approved there must a suitable plan in place so as not to disrupt local businesses. We recommend that the developer consider a similar scheme to that adopted recently in Kingston, where workers were bused in to the site from a less congested area.

## Traffic Movements

The impact on traffic movements has been estimated in the Northrop report using the methodology contained in a 2002 New South Wales document – the RTA Guide to Traffic Generating Developments Version 2.2 October 2002. There is no suitably comparable hotel documented in this report and a pub-style hotel was used as a poor proxy.

In this model the evening peak hour vehicular trips were assumed to be 0.4 per unit and the daily vehicular trips 3 per unit, leading to 24 evening peak hour vehicle trips and 174 daily vehicular trips for the proposed hotel.

For restaurants, the RTA Guide provides the following rates:

Evening peak hour vehicle trips of 5 per 100m<sup>2</sup> gross floor area and daily vehicular trips of 60 per 100m<sup>2</sup> gross floor area. Consequently, a 120m<sup>2</sup> the restaurant should produce 6 evening peak hour vehicle trips and 72 daily vehicular trips. The total number of daily traffic movements for the complete hotel would be 30 evening peak hour vehicle trips and 246 daily vehicle trips.

The analysis used by Northrop was based on data that are over 15 years old. If we use the more recent 2014 analysis of Parsons Brinckerhoff Australia Pty Limited, ([https://www.dpti.sa.gov.au/\\_data/assets/pdf\\_file/0011/322004/11542728-v1-DPTI - Trip Generation Rates - 2014.pdf](https://www.dpti.sa.gov.au/_data/assets/pdf_file/0011/322004/11542728-v1-DPTI - Trip Generation Rates - 2014.pdf)) the results are significantly different. This more recent report used data from cities in the US, New Zealand and the UK for the hotel movements and from Australia (two from NSW and one from WA) USA and UK for restaurants.

Using this methodology it is estimated there will be 113 daily trips and 10 peak hour trips for the restaurant.

For hotels the estimate is 8 trips per room and 0.9 peak hour trips, resulting in 464 trips per day and a peak hour number of 52 trips for the whole hotel.

Adding the restaurant numbers to the hotel numbers **the total number of daily movements is 577 and 39 peak hour trips** (10 + 464/16). The estimate from the more recent data gives a similar peak hour result but more than twice the trips estimated in the Northrop report. It

should also be noted that the area designated for the restaurant may be larger than the 120m<sup>2</sup> in the DA, and that would have an input on the traffic numbers

The statement in the Northrop report that the existing facility on blocks 3 and 4 was producing 38 evening peak hour vehicle trips and 450 daily vehicular trips is irrelevant. The Mr Sushi restaurant has not been producing any vehicular traffic for over a year and has not been responsible for any vehicle trips in that period.

Essentially the completed hotel is likely to produce approximately 600 extra trips per day. A comprehensive assessment needs to be done that includes consideration of estimated vehicle trips that will be generated by the re-developed Stuart Flats, Gowrie Court and any other development that is in its formative stage.

Had a Master Plan been available, it could have been used as one of the inputs to permit a more realistic estimate of future traffic volumes in and around Manuka.

## **Recommendations**

The proposed hotel could be a welcome development in Manuka and could revitalise some of the areas in need of a make-over. However, before Development Application 201833731 is approved we recommend that:

1. A proper community consultation takes place to consider the whole re-development of Section 96 Griffith.
2. A plan is approved to provide access for construction workers without taking up car parks normally used by the patrons of Manuka business establishments.
3. The area of the proposed restaurant be measured by the EP&SD directorate.
4. The plans be amended to include a minimum of 75 on-site car parking places.
5. An independent comprehensive traffic flow study be undertaken to determine the extent of the expected increased traffic flows in Manuka if the Capitol Hotel is operating and whether it will produce unacceptable congestion, bearing in mind the changes that are expected as a result of the re-development of the Stuart Flats, Gowrie Court and any other nearby developments that may be in the pipeline.

Yours sincerely



Leo Dobes  
President  
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