

10th April 2013

Attention: Mark Brown
Metropolitan & Regional Projects South,
NSW Department of Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

RE: MP 10_0230 - Project Application Stage 1 - Retail / Club Precinct, Cronulla Sharks

Dear Sir,

RESPONSE TO PLANNING DEPT ASSESSMENT

RE: MP 10_0230 - Project Application Stage 1 - Retail / Club Precinct, Cronulla Sharks

North Cronulla & Woolooware Precinct Committee wishes to submit our objection to the above Development Application for Cronulla Sharks Leagues club for the following reasons:

1 PARKING SHORTAGE for RETAIL CLUB PRECINCT

This application fails to meet the specific condition of the Planning Assessment Commission Approval of 27 August 2012 that a minimum of 770 spaces be provided for the retail and club precinct.

We submit that NSW Planning should take into account the following when making such an important decision on parking spaces, which affects the total viability of the retail/club project. If sufficient parking cannot be supplied, the development should be scaled down in size.

- The present club has approximately 1,000 spaces and that these are totally utilised on game days.
- The retail/club development is in an isolated location with no public transport. The nearest railway station is 1.3 kilometres away.
- The retail uses will rely heavily on private cars.
- Notwithstanding the condition of the PAC Approval, the McLaren Engineering report "Traffic and Parking Impact Assessment Sharks Club Feb 2013" still maintains in table 2 section 4.1 Parking Assessment that **peak demand for the club/retail development is 545 spaces**. This flies in the face of the PAC finding that 770 spaces be a minimum.
- We do not accept the consultant's statement that the 770 spaces specified by PAC "allows for non design peak events and potential growth of the retail development".

(A) PARKING FOR THE CLUB

The McLaren report recognises that the new club will be reduced in size from 8,500m² to 3,450m² and that parking should proportionately be reduced from the present 180 average demand (for the existing club) by 107 spaces to **73 for the new club**.

We draw to your attention to the fact that Cronulla RSL, which is 3,500 m² in size or the same size as the proposed Sharks, has 155 parking spaces however this club has excellent public transport being a two minute walk from the railway station. Also, this club has recent consent to improve parking.

Tim McAleer, Manager of Tradies GyMEA, stated that they put in an extremely ample supply of parking

spaces in their recent redevelopment as patrons expect to have always available supplies of secure, well lit, undercover parking. If Sharks patrons cannot get parking internally, this will compromise operations for the club as there is no parking on Captain Cook Drive and no immediately adjacent street parking.

The consultant's report confusingly states on page 8 section 4.1 that, despite stating the club only needs 73 spaces at peak demand, it will have available "exclusively and free of charge" spaces of 143 during the week Mon to Sunday 9 to 5, 256 for 5pm to close Mon to Thurs and 300 for Fri Sat and Sun 5pm onwards. There is no detail on the basis of these figures. Surely the retail and other uses for the commercial spaces will dictate how many spaces club goers will have? The Retail table later in this submission shows that, based on other local shopping centres, the retail component of this project should have around 1000/1200 spaces alone!

Further there are many players and visitors to the Captain Cook and Solander playing fields and patrons of Fitness First who currently park at both Sharks current parking areas. Often the Junior Rugby League parking area of 500 spaces is occupied up to 50% by the other sporting fields. The residential development of small units and single car parks for 1 and 2 bedrooms units will cause residents and visitors to park in the sporting fields car parks. Therefore whether visitors and players, or short term resident or visitors, there will be many people looking for short term parking at the only other car park in the area, being the retail club parking.

SUMMARY The new Sharks club is the same size as Cronulla RSL which has 155 spaces and great public transport at its door. It is our view that the new club facility would need at least 155 spaces if it had similar public transport. As it has no public transport, we submit that in the order of 200 spaces should be required for the club only.

(B) PARKING FOR THE RETAIL CENTRE (EXCLUDING THE CLUB)

The balance of the subject site has consent for approximately 23,045m² of retail space however the proposal only includes 472 spaces for this use (545 less the 73 for the club). However, based on the PAC minimum of 770 spaces and assuming that the club only needs 73, the result is that the retail will have a maximum of 697 spaces.

	Trade area (m ²)	Car parking spaces	Sharks development at rate of parking at other Centres
Sharks	23,045	697	
Roselands	50,000	3,600	1,656 spaces
Miranda Westfield	108,000	4,320	919 spaces
Southgate, Sylvania	23,000	1,049	1,049 spaces
Caringbah Village (Woolworths centre)	5,500	300	1,254 spaces

The table compares the retail trade area of the proposed Sharks development with the trade area of a number of other retail centres and applies the resultant parking ratios to the proposed Sharks development. Below is a table showing the comparison of parking to trade areas. The last column works out what Sharks should have if parking was at the same rate as the other retail centres. For example, on the basis of trade area, Sharks and Southgate are identical in trading size, so at the Southgate rate for parking, Sharks should have

around 1050 spaces (for the retail centre alone). At parking rates of the busy Caringbah Village centre, Sharks at 4.18 times the trade area would need 1254 spaces. Compared to Westfield, Sharks is 21% of the size, so at Westfield Miranda's rate of parking, it would need 920 spaces. Sharks is 46% the size of Roselands, so at Roselands ample rate, would need 1656 spaces.

It is worth noting that, unlike Sharks, Westfield and Caringbah shopping centres are adjacent or extremely close to Miranda and Caringbah Stations. However Westfield is currently applying for paid parking to improve its parking availability for patrons.

SUMMARY: It is submitted that this comparison clearly demonstrates that the retail area of the Sharks development requires between 900 and 1,200 spaces or, alternatively, should be reduced in size commensurate with the proposed parking of 697 maximum spaces.

(C) NIL PARKING ALLOWED FOR LEISURE FACILITIES

Consultants have allowed no spaces at all for the leisure facilities of 2,968m² by saying that these patrons or children of patrons will have a dual use of the retail or club area. One only has to look at the parking requirements of the nearby leisure facility of Fitness First which uses all their spaces and some of Sharks. Surely the type of leisure facility will determine the number of patrons and, as this is still unknown, an estimated number of spaces should be allocated in a professional parking study.

(D) STAFF PARKING

What allowance has been made for parking for club and retail staff? In a previous report the commercial centre was to generate around 500 jobs. The report appears silent on that aspect. Many staff in outlying areas will want to drive to work, particularly if they are working late hours.

2 TRAFFIC DELAYS ON CAPTAIN COOK DRIVE AND WOOLLOOWARE AREA

(A) 4 SETS OF LIGHTS ON CAPTAIN COOK DRIVE BETWEEN WOOLLOOWARE RD AND GANNONS RD.

The pedestrian crossing used between the sporting fields of Solander and Captain Cook fields is a signalised crossing on demand and is quite a distance from the end of the residential centre nearest Woollooware Station. The development plans to add 3 more sets of lights, one at Woollooware Rd, one into the retail commercial development and one into the residential area. Therefore there would be 4 sets of lights in the roadway between Woollooware Rd and Gannons Road.

We submit that the project should be redesigned so as to have only two sets of lights instead of four in this section of Captain Cook Drive.

(B) GANNONS ROAD AND ELOUERA RD SIGNALISATION?

The report states that Gannons Rd and Elouera Rd roundabouts would be maintained as is, ie without signalisation.

Can Planning reveal on what basis is it determined that Gannons Road and Elouera Rd would not require signalisation with the increased traffic load caused by this development? If this were the case, there would be six sets of lights between Gannons and Elouera roundabouts.

(C) WOOLLOOWARE ROAD and GANNONS ROAD TRAFFIC IMPACTS

The traffic report agrees that Woollooware Road traffic exceeds peak hour volumes now. Can Planning advise what can be done to ameliorate the increased traffic flows impacting on this major road between the station and the centre.

Gannons Road is a heavily impacted arterial road already operating at the worst possible levels of "F" as indicated in the Traffic report. Can Planning advise if there will be infrastructure changes to ensure traffic can be handled at the beyond worst levels with the extra load from this development? For example perhaps Gannons Rd can be widened road including under the railway bridge.

3 GAME DAY PARKING

The current development has 1,000 car spaces exclusively used by the club and on Game days this is fully utilised along with hundreds of car spaces which are no longer available on Captain Cook Drive.

There are two aspects of Game Day parking which are unacceptable to local residents.

- (A) Permanent closure of Captain Cook Drive on each Game Days as fans are leaving the stadium. With the increased levels of residential expansion confirmed by the Council LEP for the Cronulla area, this is one of two major arterial roads to the Cronulla peninsula, so a closure has widespread effects on the whole of Cronulla and surrounding suburbs south of Kingsway.
- (B) It is bad planning to transfer the current parking shortages caused by Sharks building on their existing car parks to areas such as Wanda and North Cronulla car parks. Arrangements could be made to bus and ride from the industrial area of Taren Point where street parking is substantially not used at night and weekends. Otherwise buses at major rail stations throughout the Shire where bus stops already exist could be an option as they should not conflict with peak hour traffic already using those stops.

4 CONTAMINATION ISSUES

Any contamination issues found during construction **should be continuously advised to the public.**

Various small samples have been taken to show the presence of asbestos, methane and other contaminants. More would be expected to be found with the history of this site.

5 ZONING OF CENTRE AS A TOWN CENTRE

The centre should be rezoned to a village centre and the development approval as a "Town Centre" where high rise was permitted on this case is misleading. The Sutherland Shire draft 2013 LEP which has been approved by State Government has recently confirmed only low rise residential surrounding Sharks.

FINALLY

If the development were to be rezoned to a low rise Centre, many of the *unsolvable problems* of retail/club parking, game day parking and delays to local traffic this development is causing could be lessened. The proponents have ignored the PAC conditions of a minimum parking of 770 car spaces for the retail club development. It can be easily shown the maximum car spaces should be around 900 to 1200 for the retail leisure component, and up to 200 for the club area, using the comparison to a number other retail and clubs in the area.

The current application has no opportunity to expand parking supply. NSW Planning should carefully

NORTH CRONULLA PRECINCT COMMITTEE



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consider the effects on this community and take action to remedy the current proposal.

North Cronulla & Woollooware Precinct Committee