

6 May 2020  
Ref 20068

Penrith City Council  
P.O. Box 60  
PENRITH NSW 2751

Attn: Ms Kathryn Saunders  
[Kathryn.saunders@penrith.city](mailto:Kathryn.saunders@penrith.city)

Dear Kathryn,

**DA18/0298.02**  
**15 ENGINEERS PLACE, PENRITH**  
**PROPOSED DELETION OF DA CONSENT CONDITION No.21**

This letter has been prepared to request the deletion of DA consent condition No.21 of the abovementioned DA which reads as follows:

*"21. Ten car parking spaces are to be provided for the use of staff or guests (guest parking by Quest valet only) of the Quest serviced apartment development adjacent. A review of the need for these spaces may be undertaken after 24 months from the issue of the Occupation Certificate for the Quest serviced apartment development (Council development consent reference number DA16/0357). If it is determined that the 10 spaces are not being utilised at sufficient capacity, a development application may be lodged to amend or delete this condition".*

As you're aware, in September 2016, Council approved DA16/0357, involving the construction of a new serviced apartment development on the site to be operated by *Quest*, comprising 14 x 1 bedroom units & 47 dual-key units (totalling 61 units/108 keys), plus an ancillary ground floor café.



Off-street parking for the *Quest* development was approved for a total of 35 cars, comprising 1 manager's space, 1 café space and 33 serviced apartment spaces. The ground floor parking area comprised 22 spaces (including 2 accessible spaces) whilst the level 1 parking area comprised the remaining 13 spaces.

Council records indicate that the final occupation certificate for the *Quest* development was issued on 21<sup>st</sup> September 2018. A recent aerial image of the site is reproduced on the cover page.

In terms of determining the appropriate parking requirement for *Quest*, Council's *DCP 2014* does not nominate an off-street parking rate for serviced apartments. Furthermore, the *RMS Guidelines* also does not nominate an off-street parking rate for serviced apartments, referring only to *hotels – tourist*, with a recommended rate of *1 space per 4 bedrooms in 3 & 4 star hotels*.

Application of the above recommended parking rate to the 108-key *Quest* development yields an off-street parking requirement of 27 spaces. If a separate space is provided for both the *Quest* manager and the café manager, the total parking requirement would be 29 spaces.

It is pertinent to note that the likelihood of the *Quest* having 100% occupancy *and* each room occupied individually (i.e. dual-key 2 bedroom suites), is extremely *low*.

Reference is also made to the Statement of Environmental Effects report which accompanied DA16/0357, prepared by *Urbis*, as well as the Traffic & Transport Report prepared by *Parsons Brinkerhoff*, and the parking methodology adopted. The reports note:

### 5.2.2 PARKING

The serviced apartment building will be provided with 35 car park spaces. One space shall be allocated for the serviced apartment building manager and one for the proposed café. This leaves a sum of 33 car parking spaces for the serviced apartment guests.

The parking rates for Penrith City Centre and North Penrith are a maximum rate. Further, the objectives of the DCP's parking controls focus on the provision of car parking that is consistent with transit oriented development. The proposed development is entirely consistent with the parking controls and objectives.

Nonetheless, the Traffic and Transport Report at **Appendix D** states:

The amount of parking provided for the site takes into consideration the following:

- The site for the serviced apartment building has been selected for its convenient access to train and bus services and Penrith CBD. A serviced apartment operator (*Quest*) working in partnership on the project has advised that based on their experience with similar facilities around Sydney and interstate, the number of spaces provided will match demand.
- The adopted North Penrith Development Transport Mobility and Accessibility Plan envisaged a car driver mode share for all trips of 46% to 47%.
- The serviced apartment operator has advised that typical weekly peak occupancy is 80%. They also advised that 50% of the attached rooms are likely to be let as a single apartment.

Applying these typical rates to the 108 rooms/61 apartments, the number of parking spaces required for guests is 32. The following figure shows the proposed development's parking demand.

*Source: Urbis SEE (April 2016)*

FIGURE 12 – PARKING DEMAND

ROOMS	NUMBER OF GROUPS AT FULL OCCUPANCY	WITH 80% WEEKLY PEAK OCCUPANCY	CAR DRIVERS – ASSUMING 47% MODE SHARE
Single rooms	14	11.2	5.3
Adjoining rooms rented together (approx. 50% of adjoining rooms)	23 (46 individual rooms)	18.4	8.6
Adjoining rooms rented separately	48	38.4	18.0
<b>Total</b>	<b>85</b> <b>(108 individual rooms)</b>	<b>68.0</b>	<b>32.0</b>

Source: Parsons Brinckerhoff

Further, as stated in the Traffic and Transport Report:

“The parking allocated provides sufficient space for the serviced apartments based on a first principles assessment, and meets the demand based on experience from other serviced apartments. It would also meet the DCP requirements of other Councils which have rates for serviced apartments. As a maximum rate for parking in Penrith City Centre, the parking provided complies with the DCP”.

Accordingly, the proposed serviced apartment will have adequate onsite parking provision to meet the expected demand.

Based on the first principles methodology adopted by *Parsons Brinckerhoff*, including Council’s envisaged driver mode share (adopted from North Penrith Development Transport Mobility & Accessibility Plan) and operational data provided by *Quest*, the current provision of 33 parking spaces (excluding the 2 spaces for the *Quest* manager and café manager) is adequate.

Nevertheless, in order to gain an accurate appreciation of the general availability of car parking within the *Quest* development, a series of photos were taken of the ground floor car park. The photos were taken between 8<sup>th</sup> April and 20<sup>th</sup> April 2020, at regular intervals throughout the day, and are attached (including times and dates).

The photos confirm that *Quest*’s ground floor car park never came close to capacity on the dates the photos were taken and that substantial spare car parking capacity remained available throughout the duration of the photographed days.

Furthermore, the *Quest* ground floor car park includes a number of tandem spaces. In theory, if the *Quest* car park was ever full, *Quest*’s valet would need to move cars parked in those tandem spaces in order to gain access to the other car within the tandem space. The photos however indicate that *at no time* were those tandem spaces ever occupied by two cars.

The substantial availability of on-site car parking suggests that there is no reliance by *Quest* for overflow parking, either by way of parking on-street *or* within the future development on the subject site, and certainly no requirement for a valet service.

It is also worth noting that Penrith railway station is situated just 80m walking distance, with regular services operating between the City and the Blue Mountains, including express services.

Providing parking for a particular development on a nearby/neighbouring property is fraught with complexities, such as liability and insurances as well as the likely requirement to create new easements.

In light of the above, the requirement to provide 10 *additional* parking spaces for *Quest* on the subject site's future mixed use development is considered onerous and not practically or numerically required, not to mention operationally and legally undesirable.

Importantly, the proposal *not* to provide the additional 10 *Quest* parking spaces on the subject site is not expected to result in any unacceptable parking implications for *Quest* or the surrounding on-street parking areas.

Please do not hesitate to contact me on telephone 9904 3224 should you have any enquiries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'CPalmer', written in a cursive style.

Chris Palmer  
Executive Engineer B.Eng (Civil)  
Varga Traffic Planning Pty Ltd

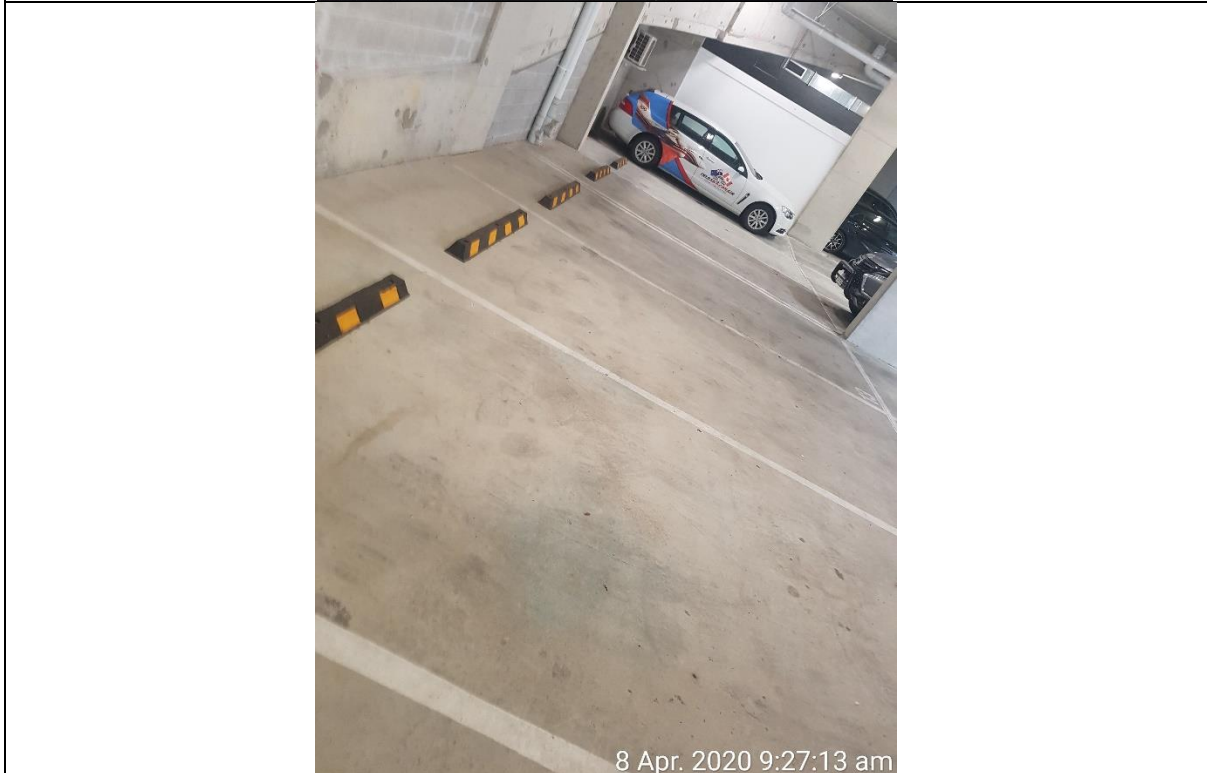
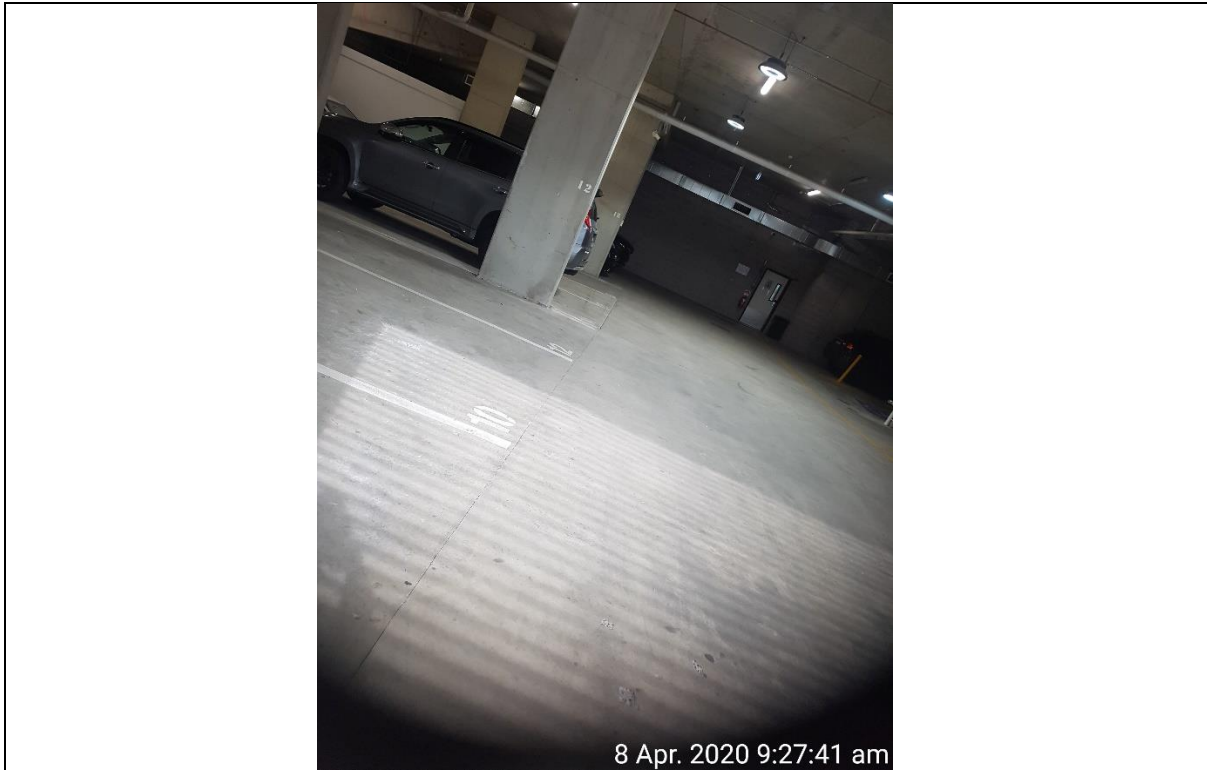
## Quest Car Park Status Report

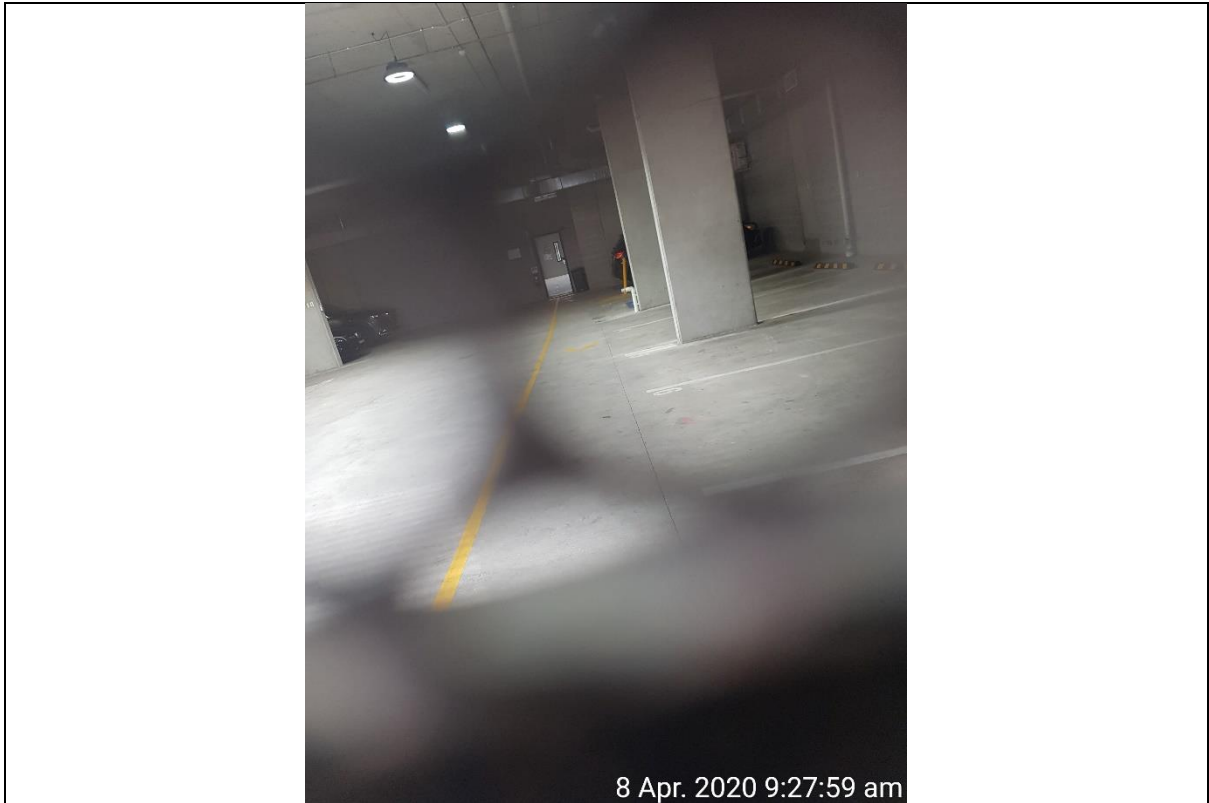
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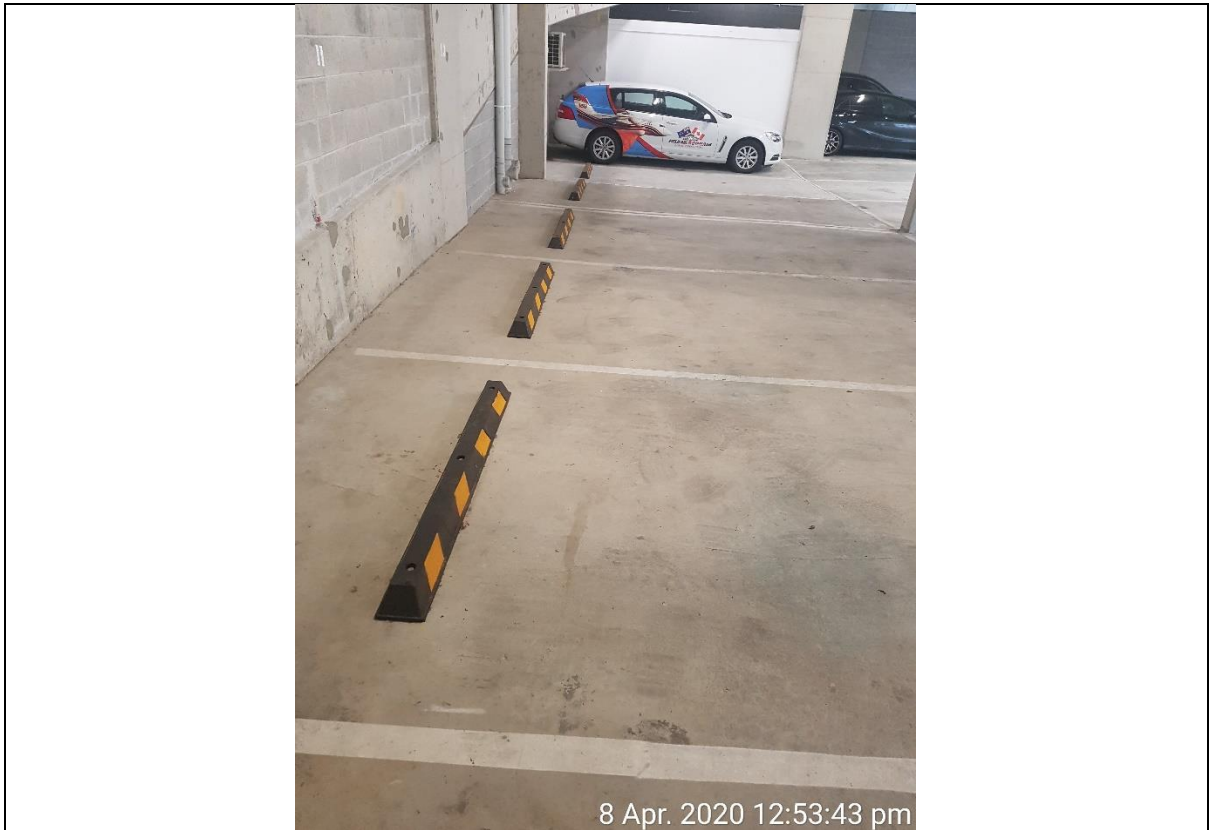
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Morning



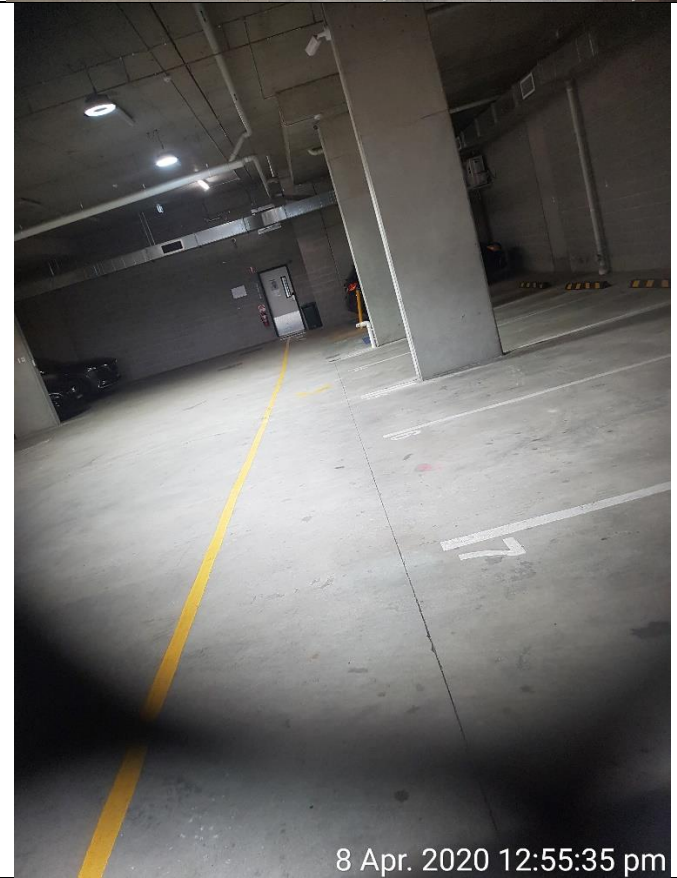


Midday





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8 Apr. 2020 12:55:35 pm



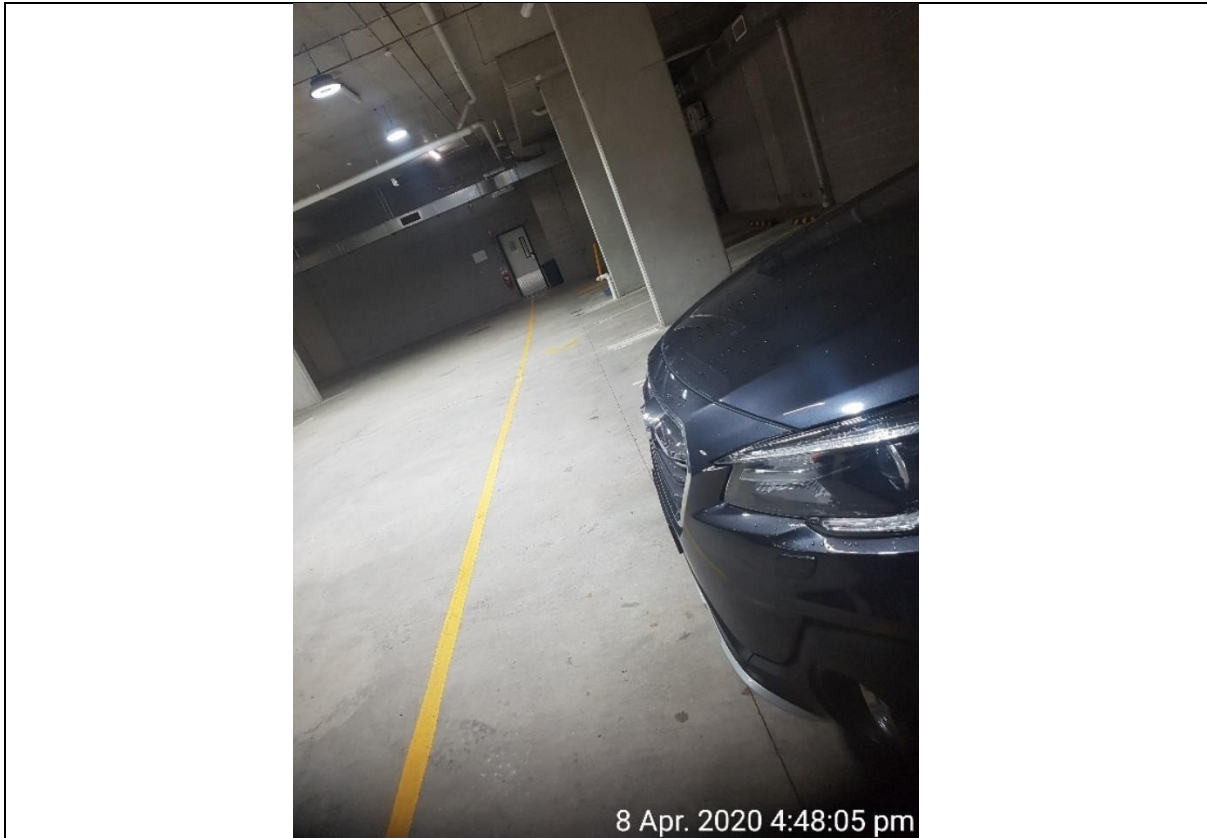
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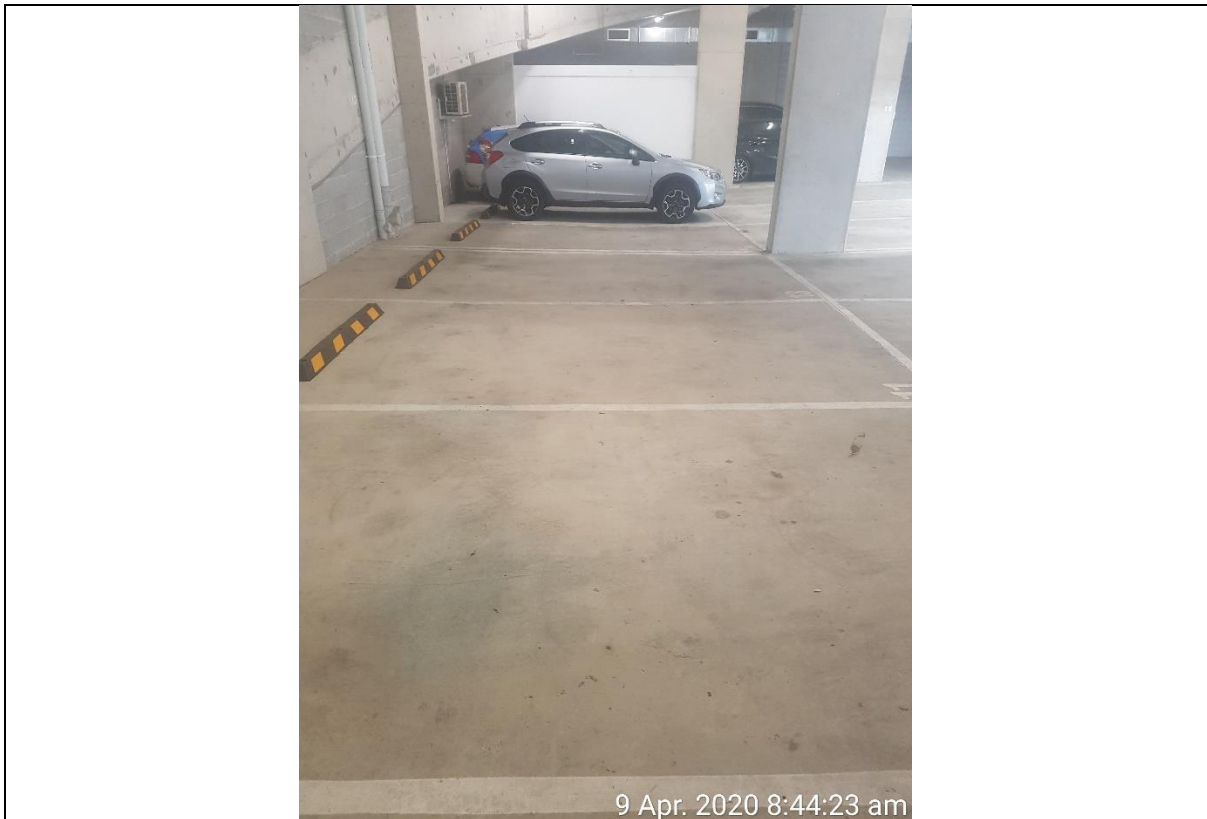


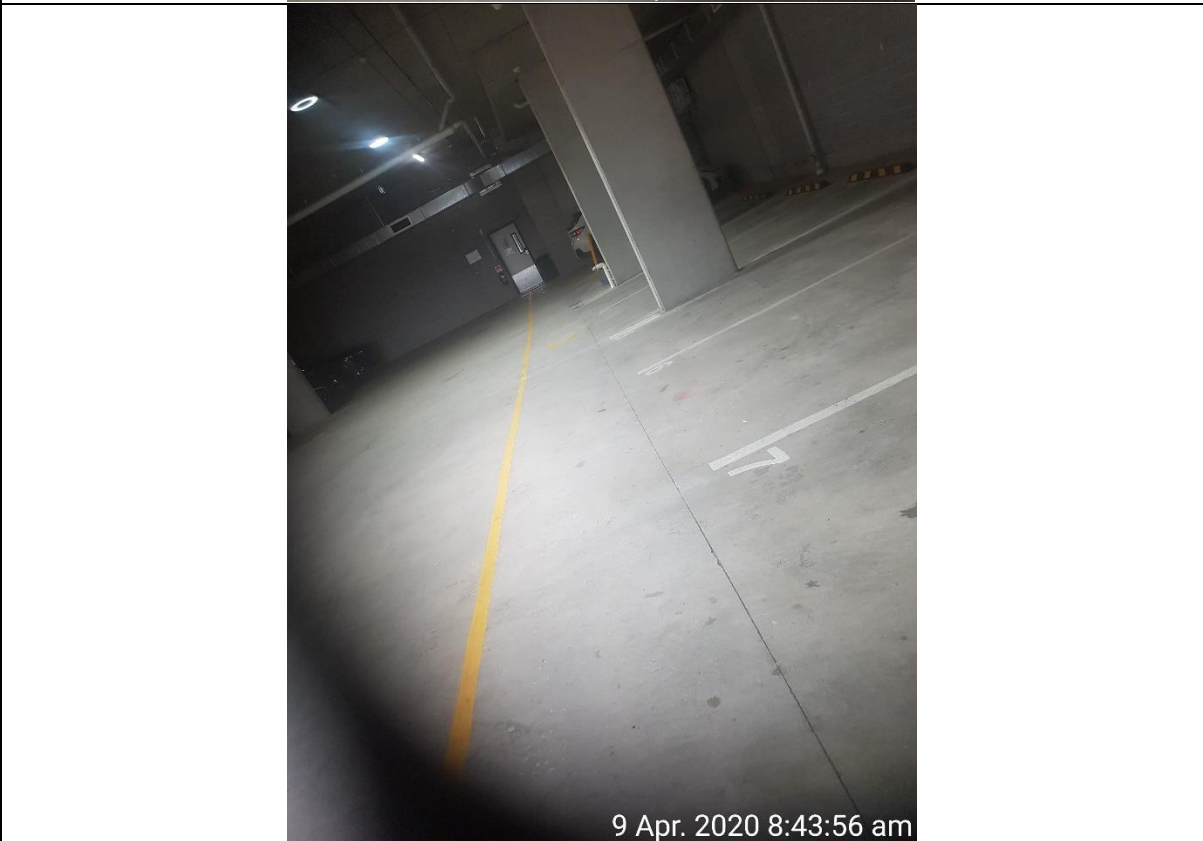
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09/04/2020

Morning

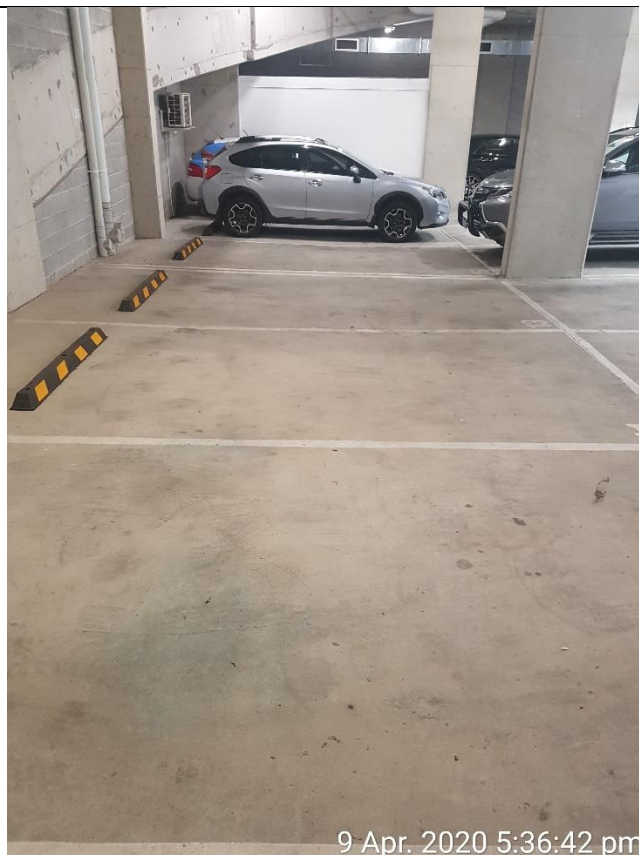


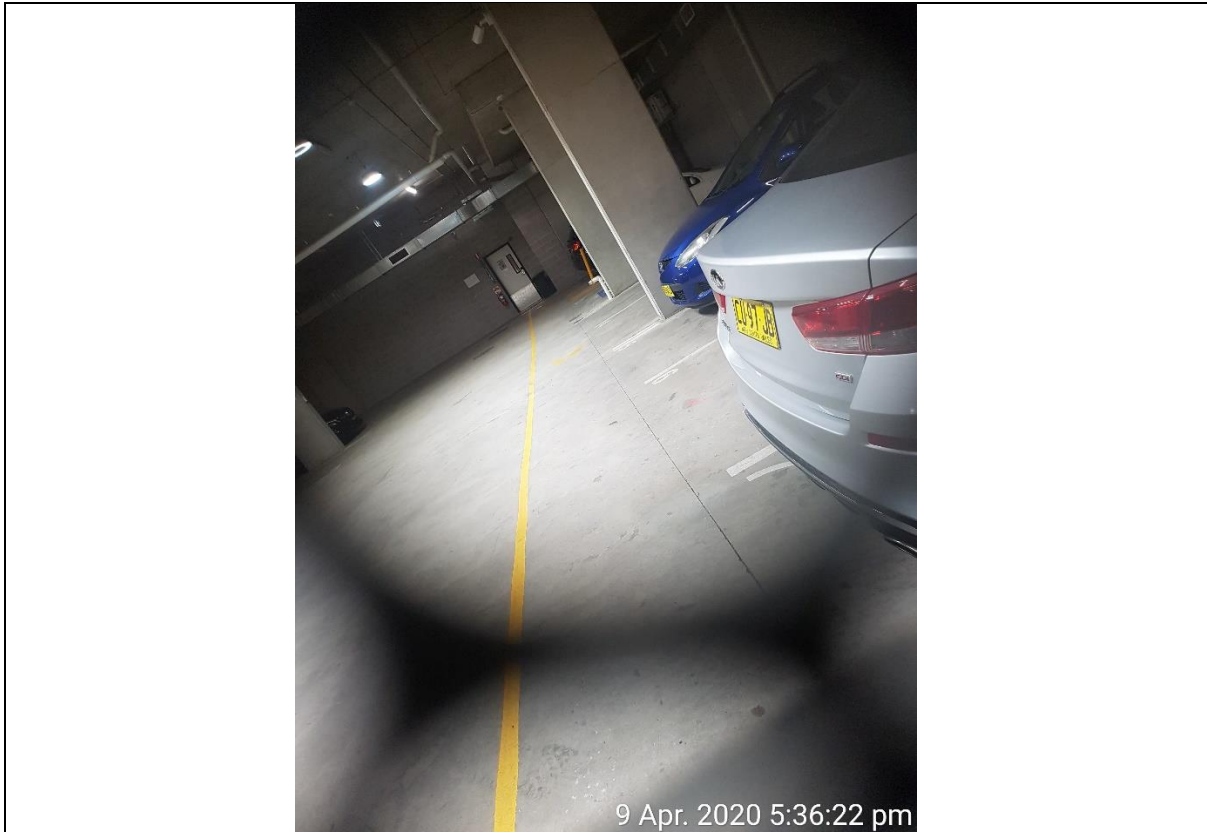


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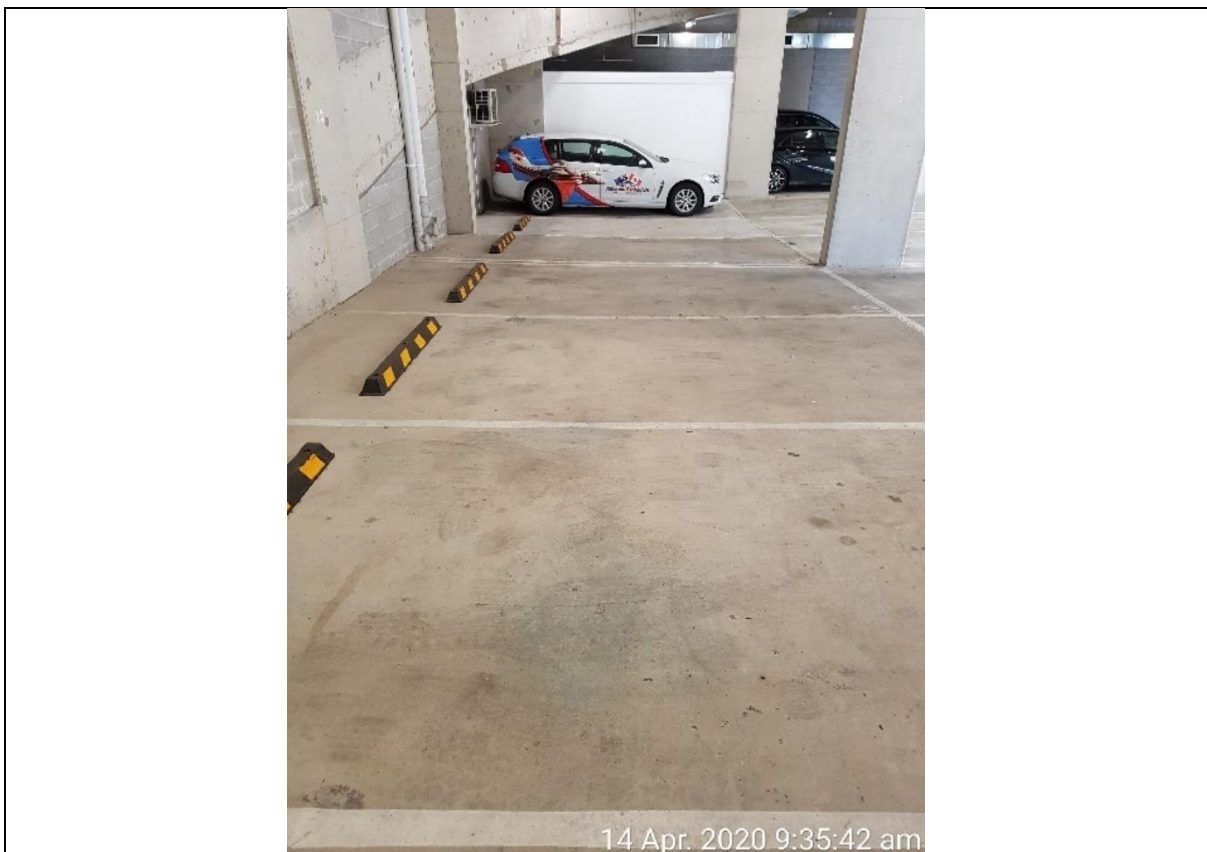
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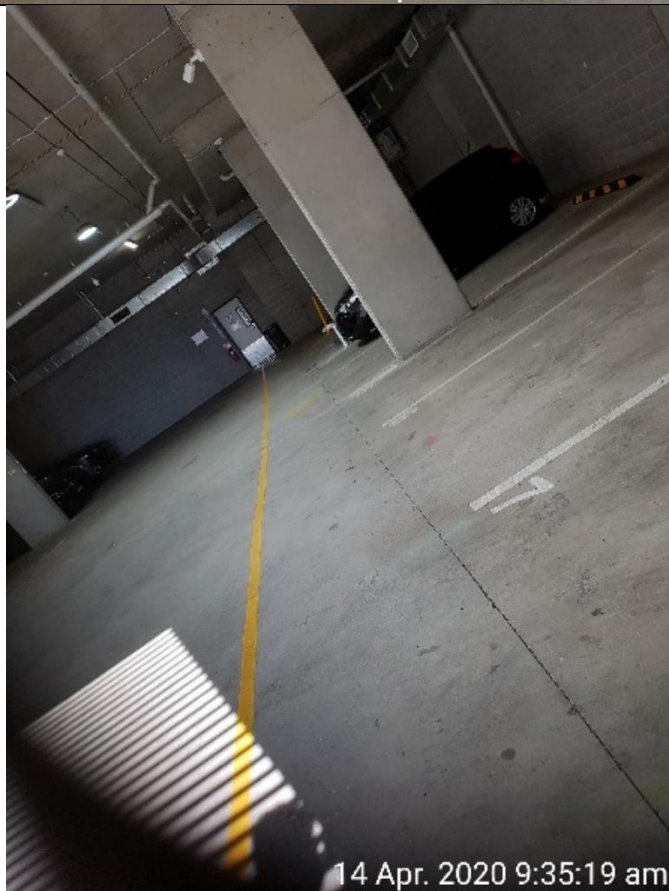
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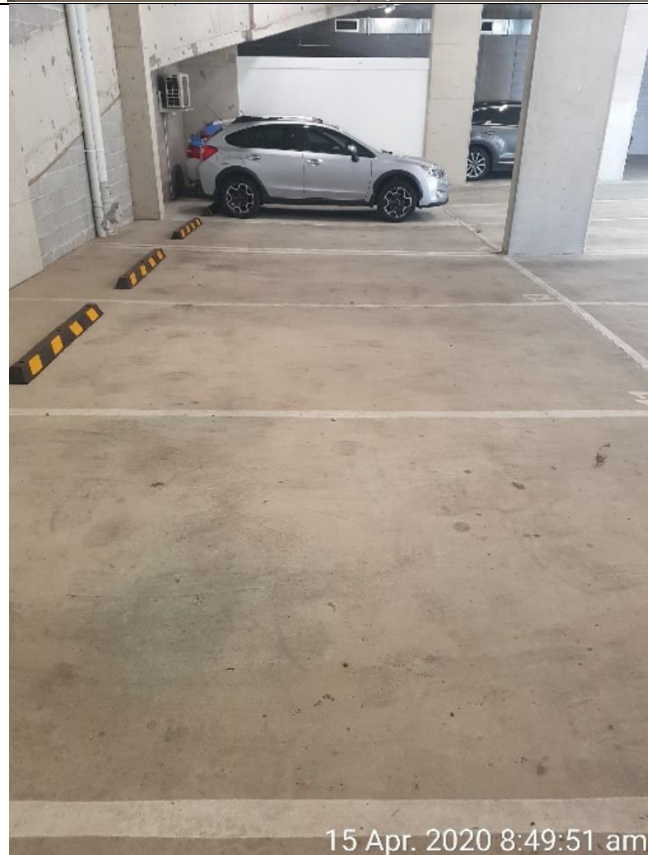
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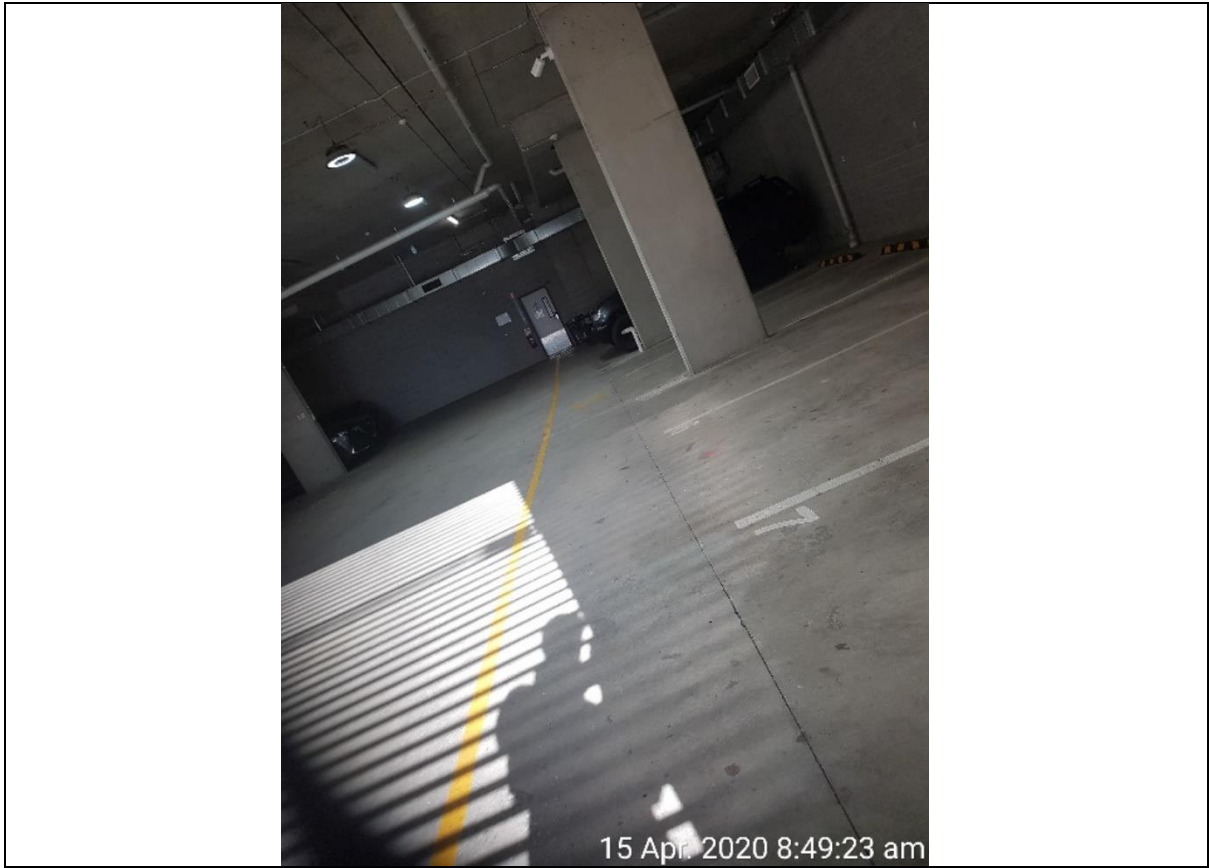
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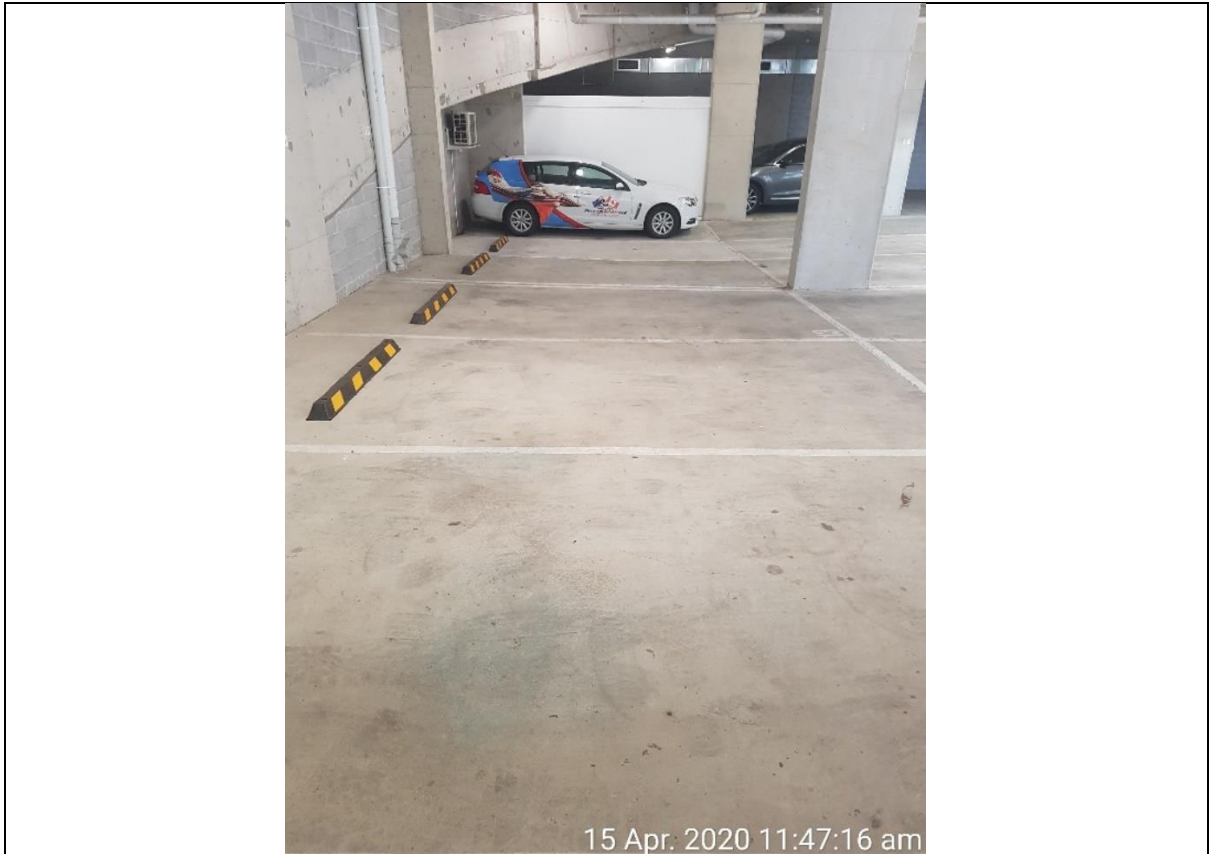
Morning





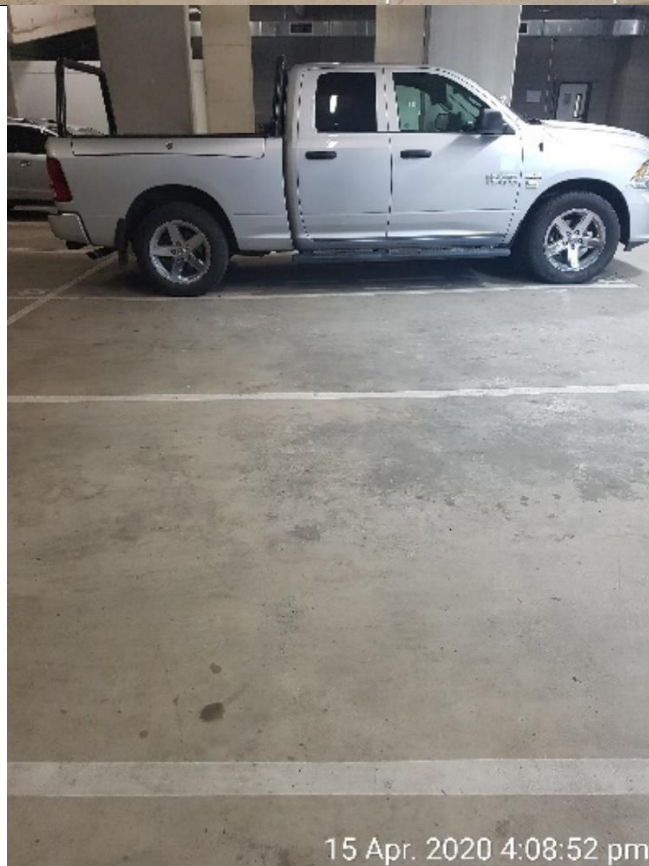
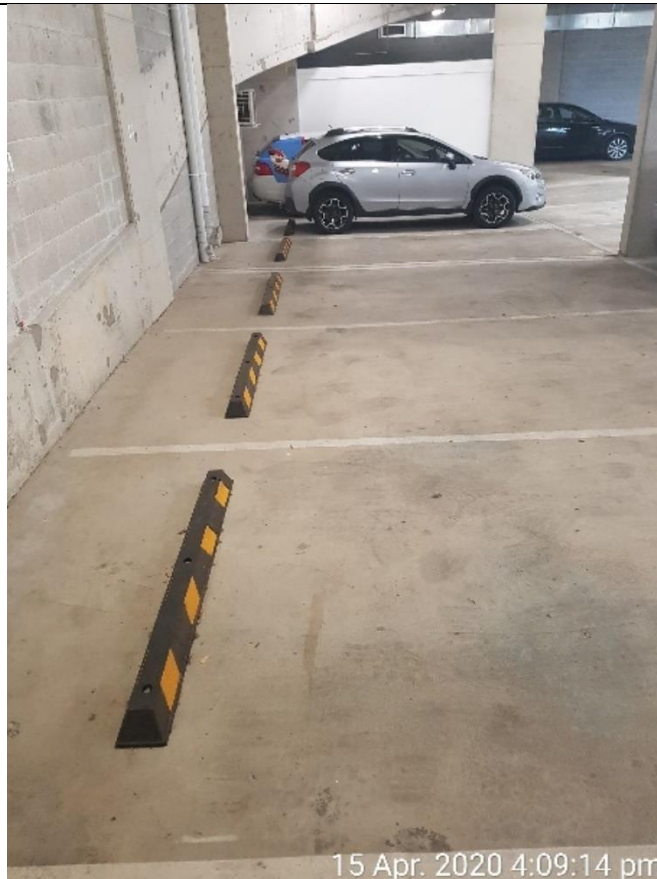


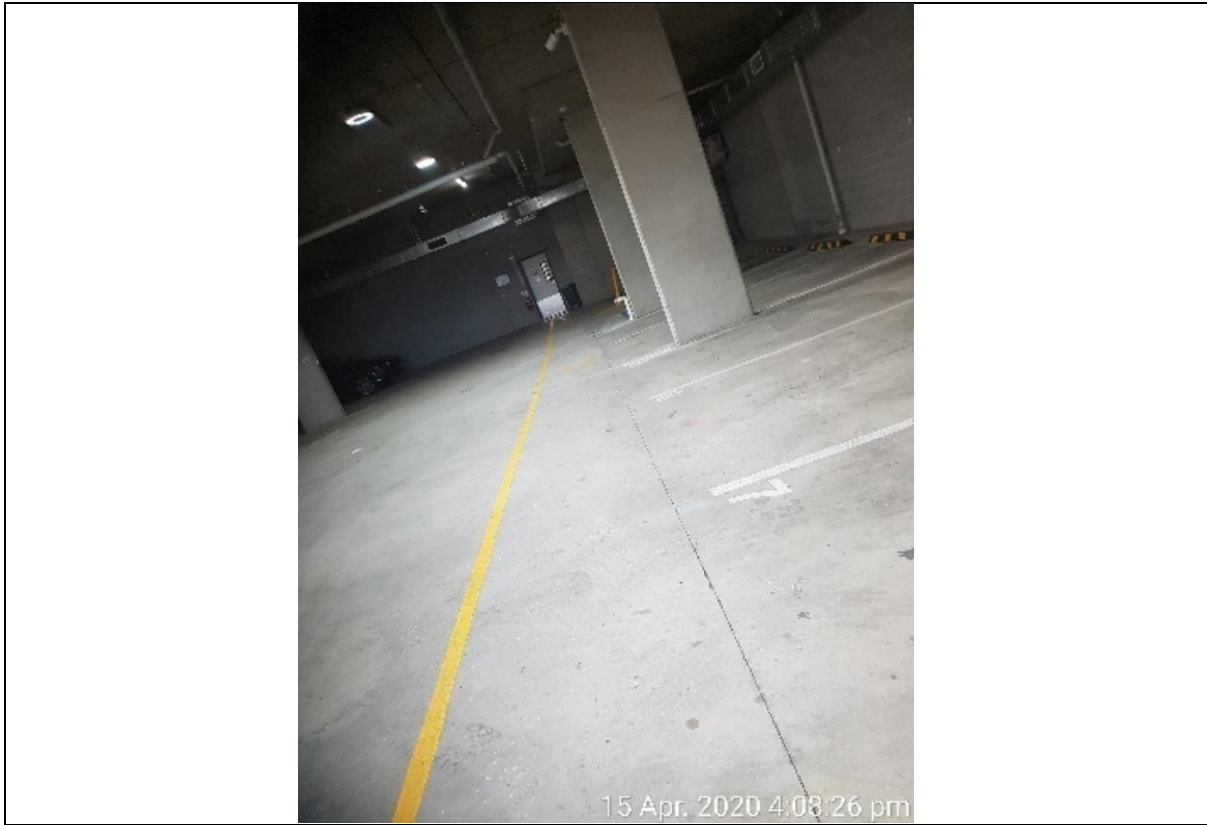
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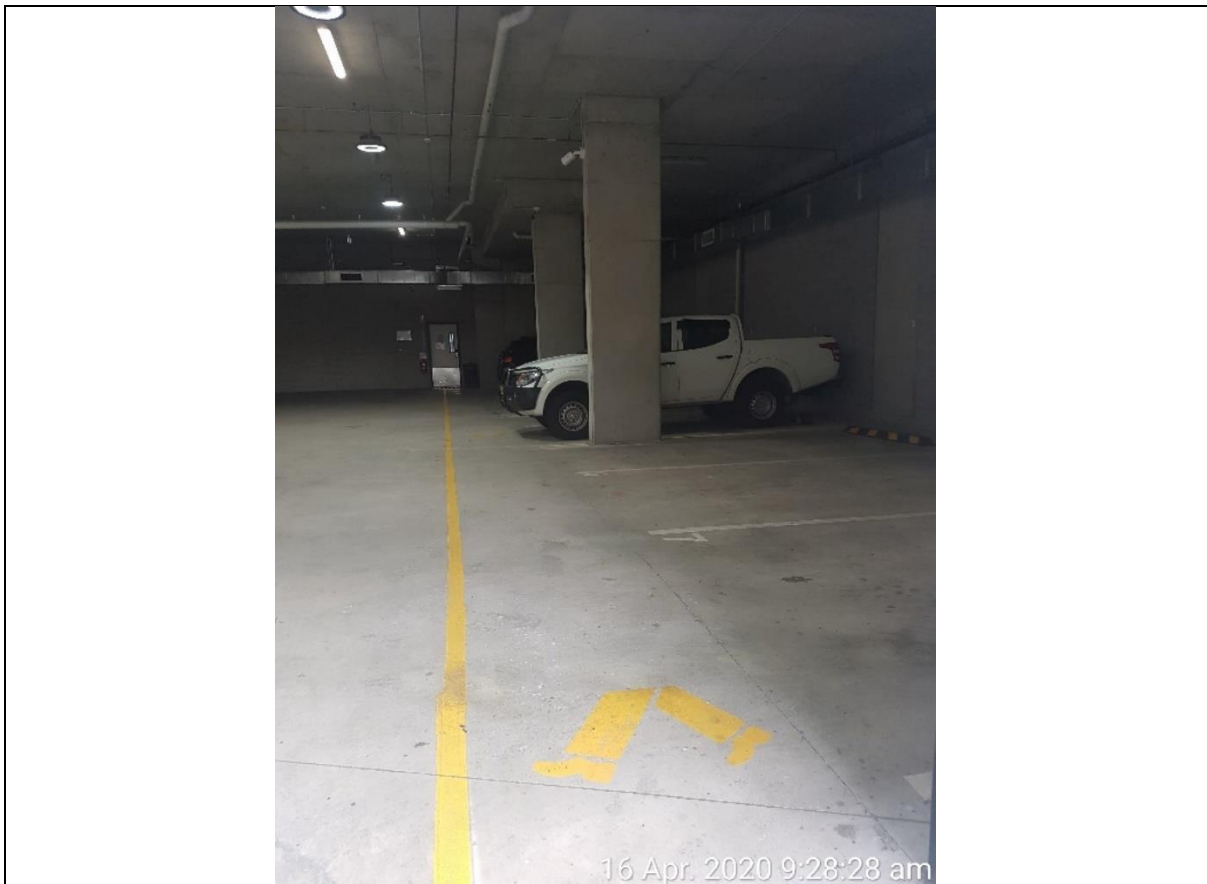
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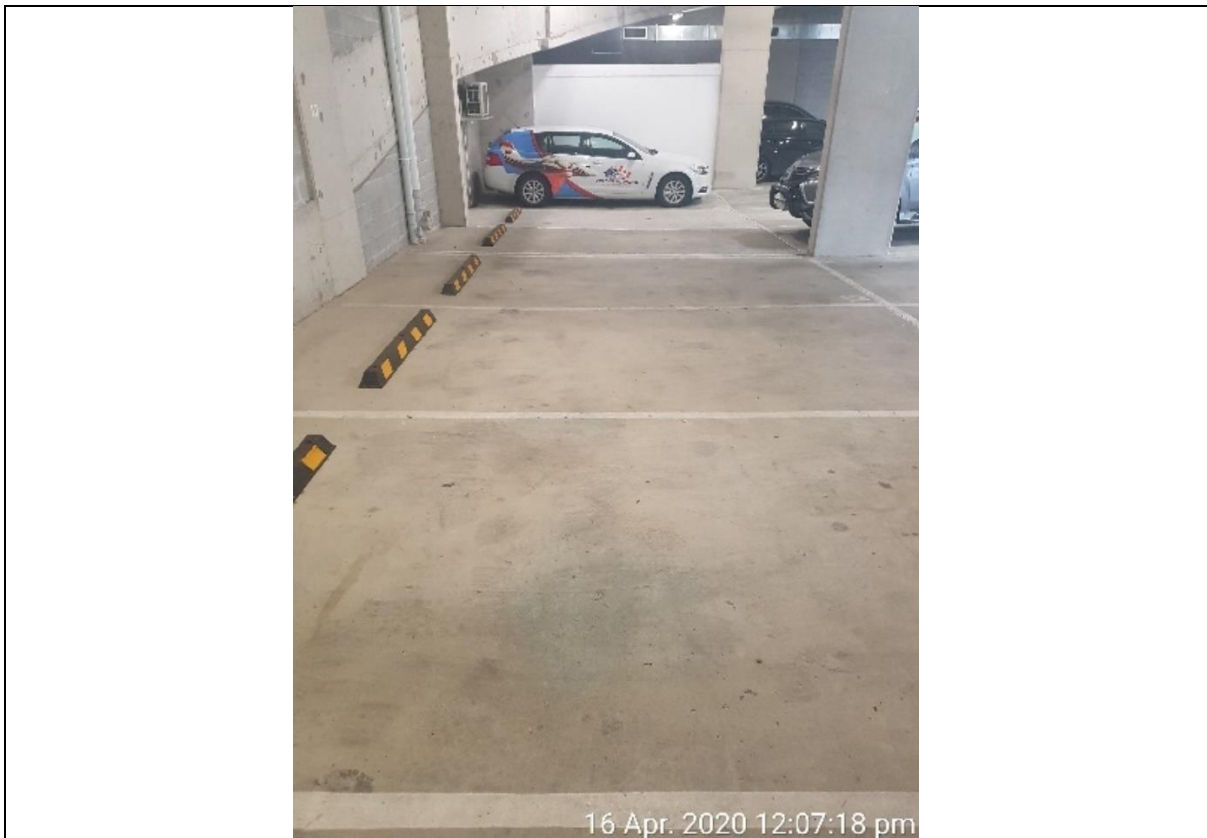
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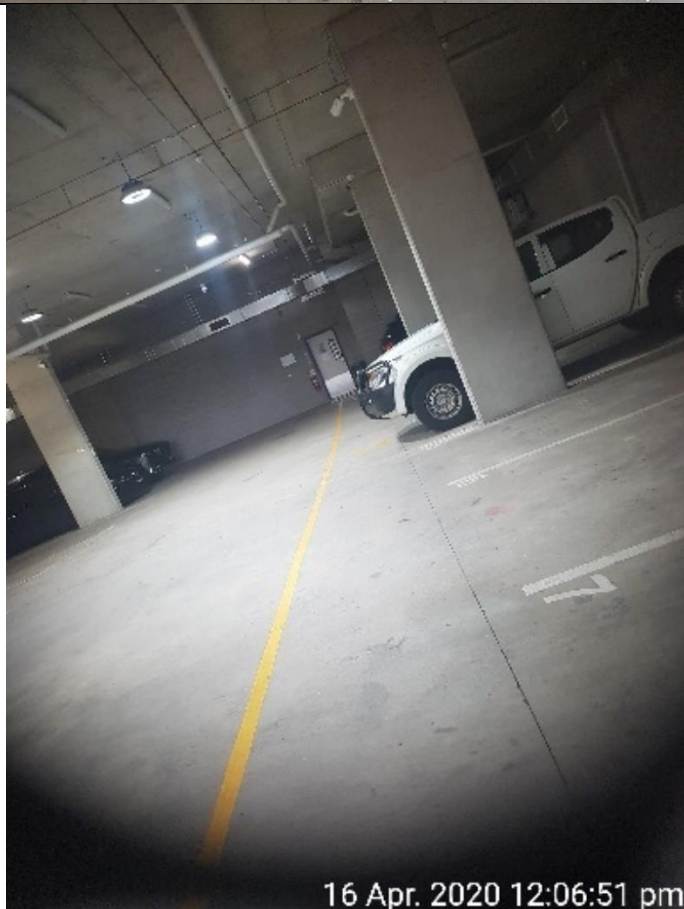
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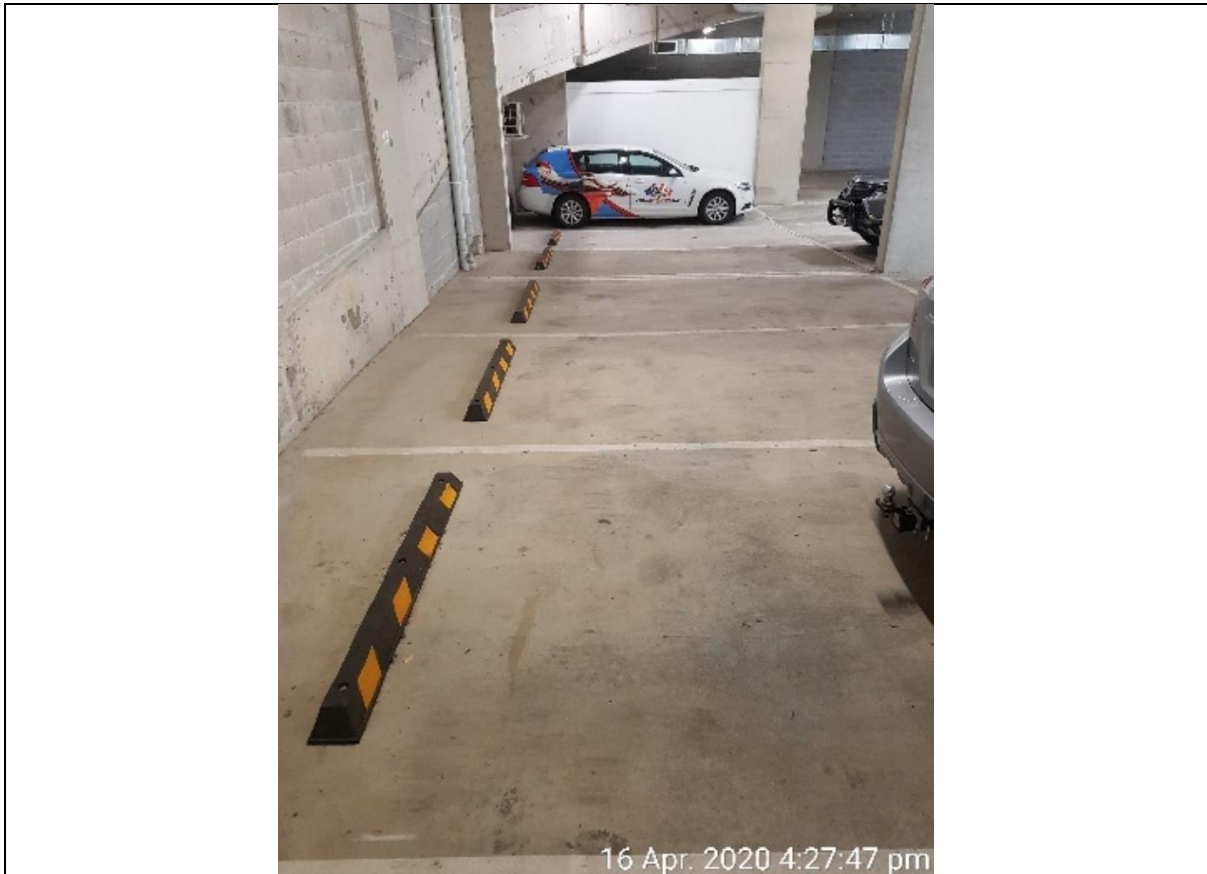


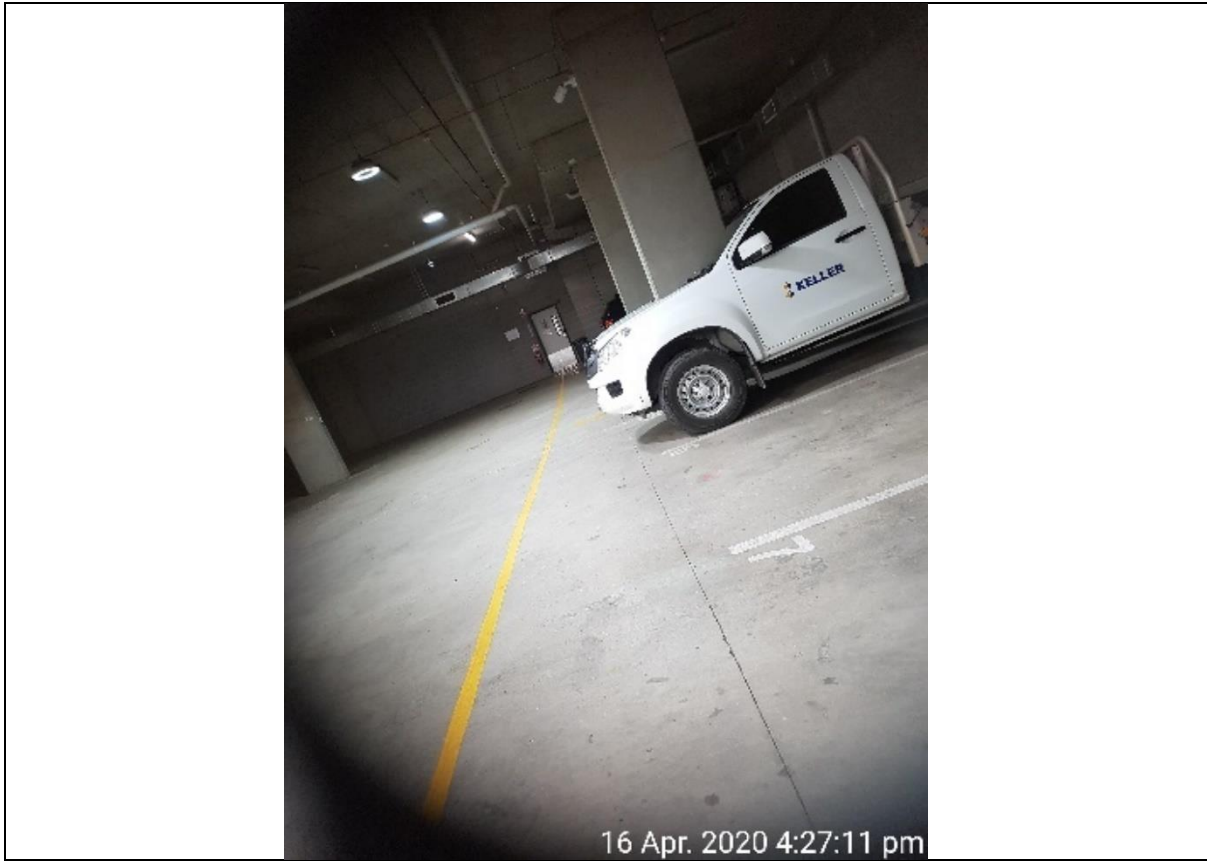
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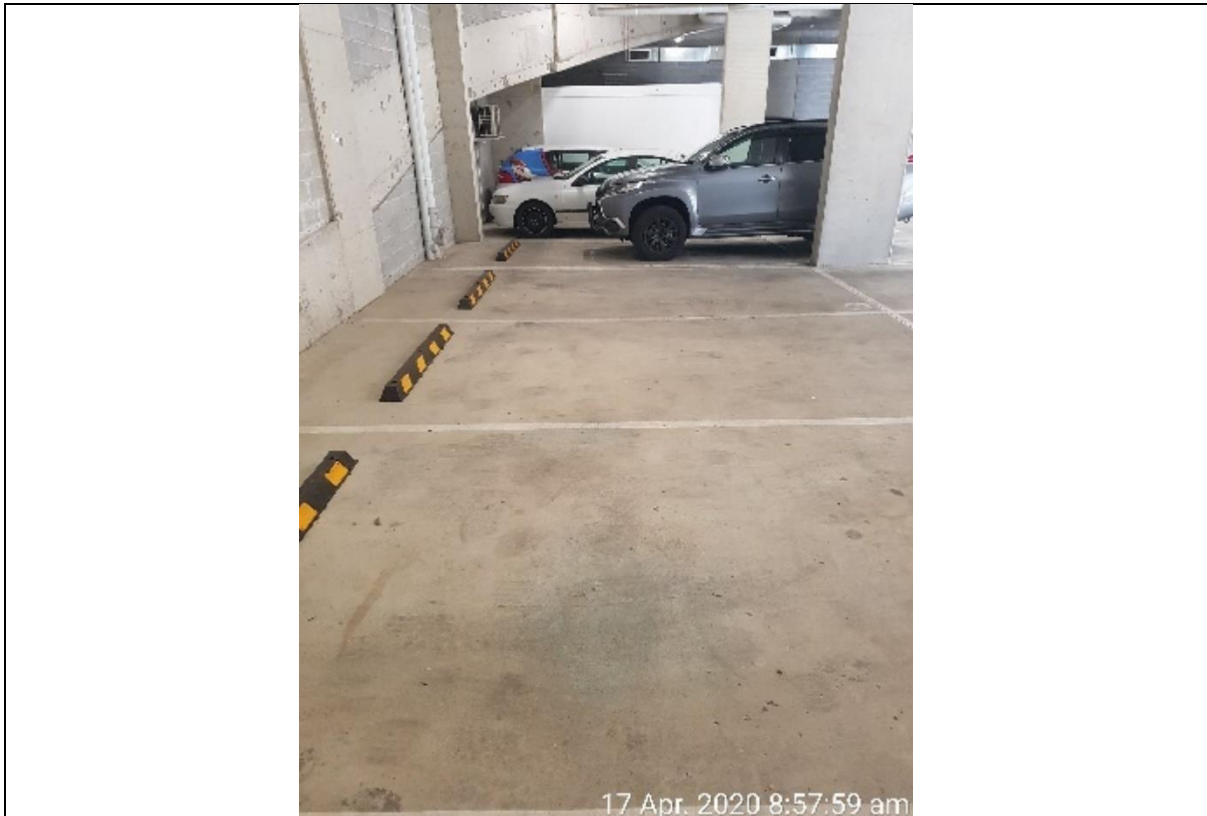
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17/04/2020

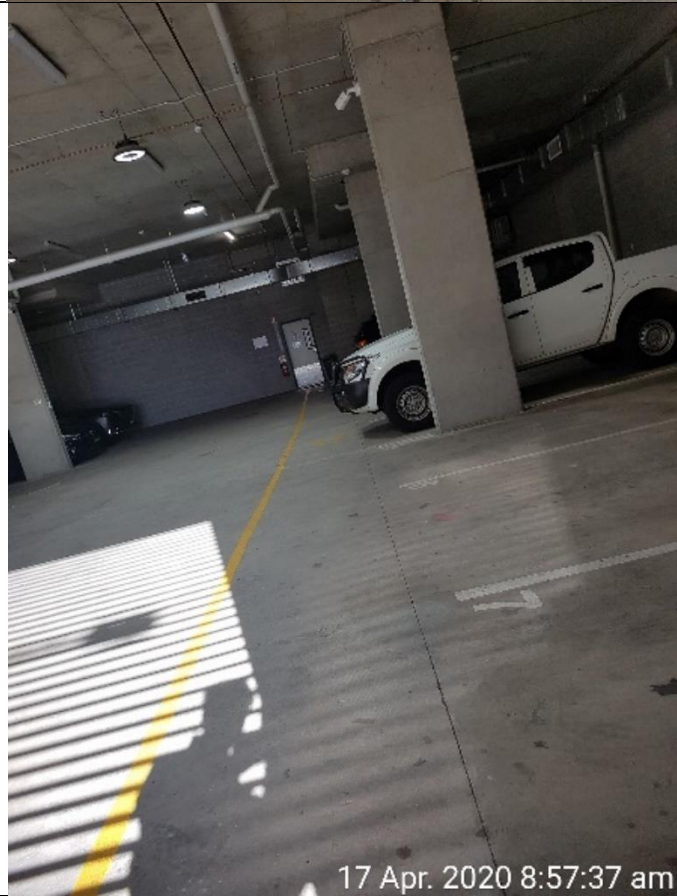
Morning





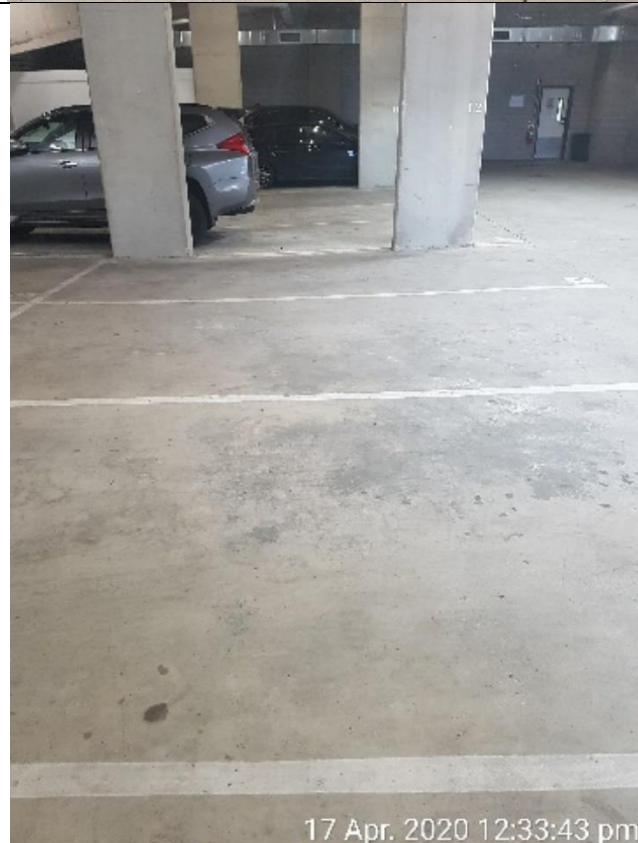
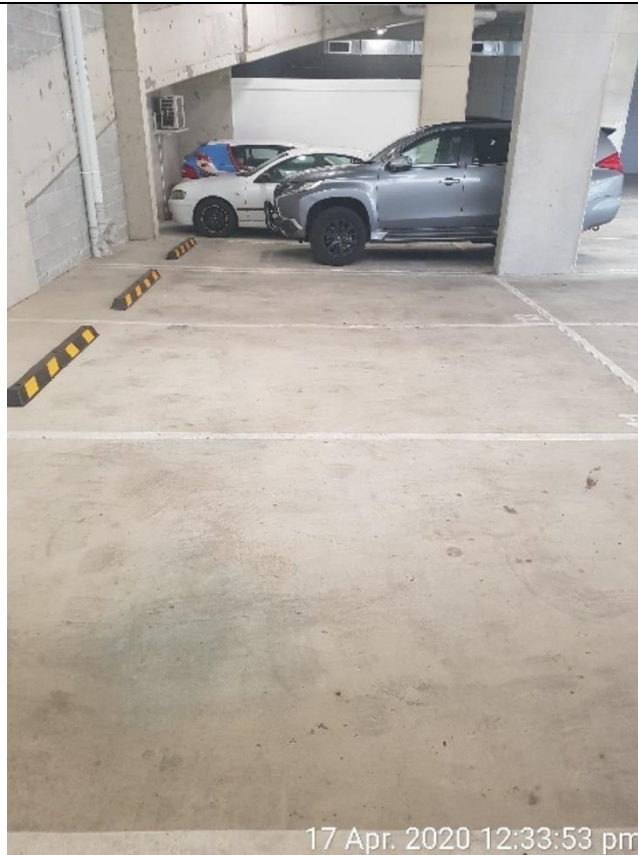


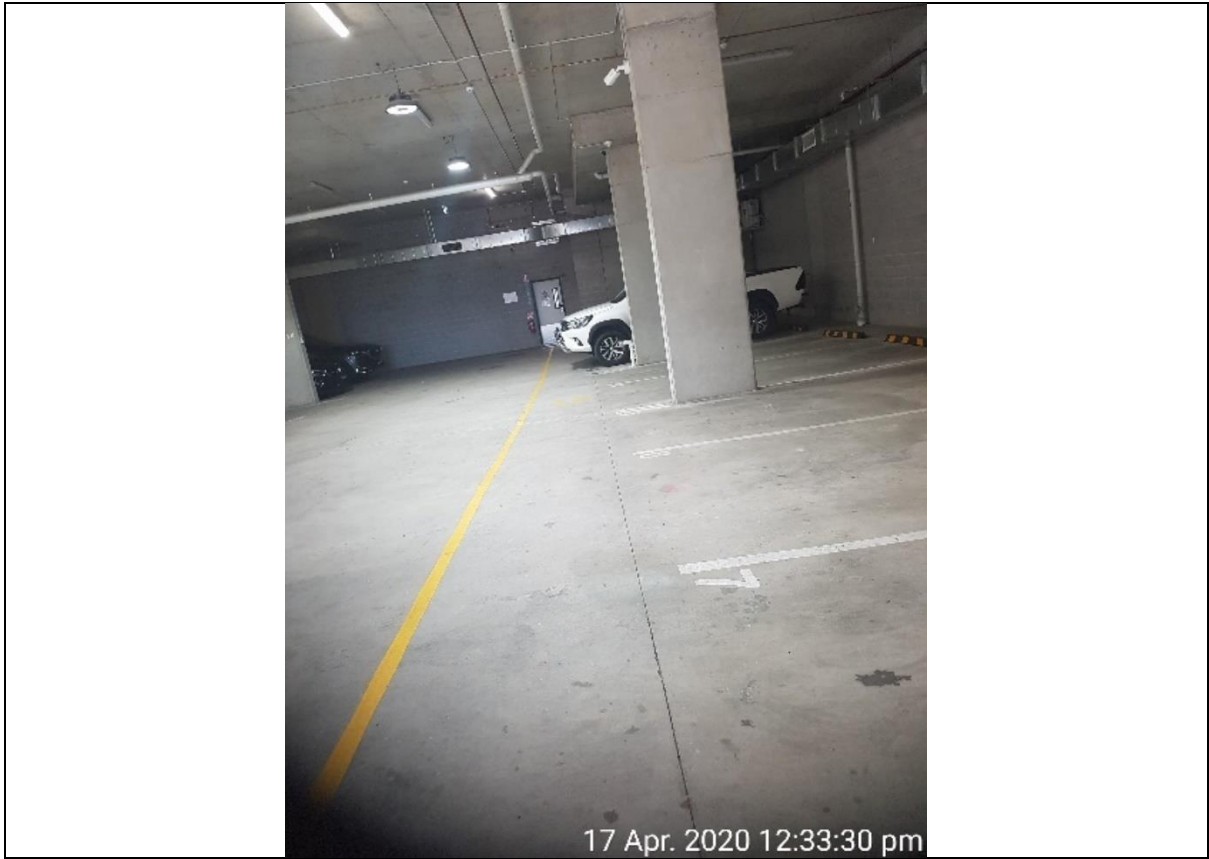
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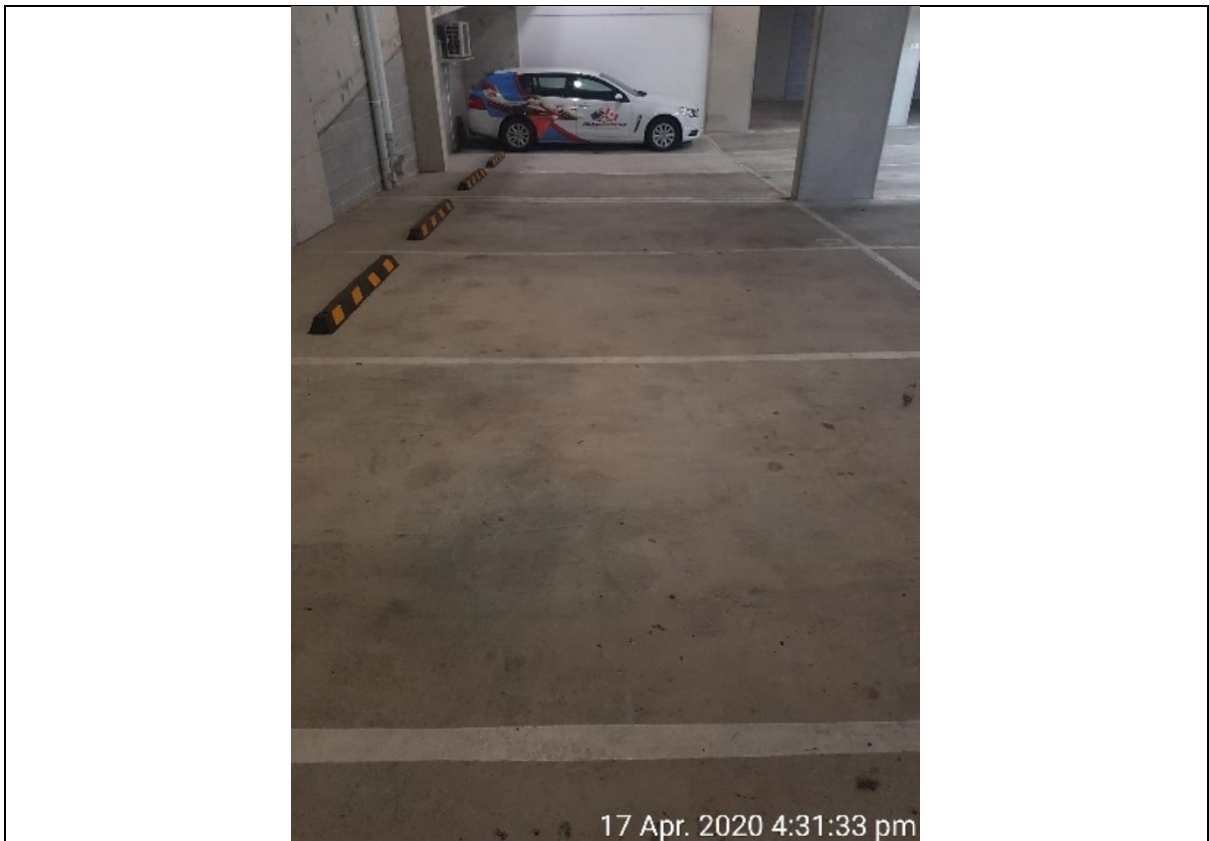
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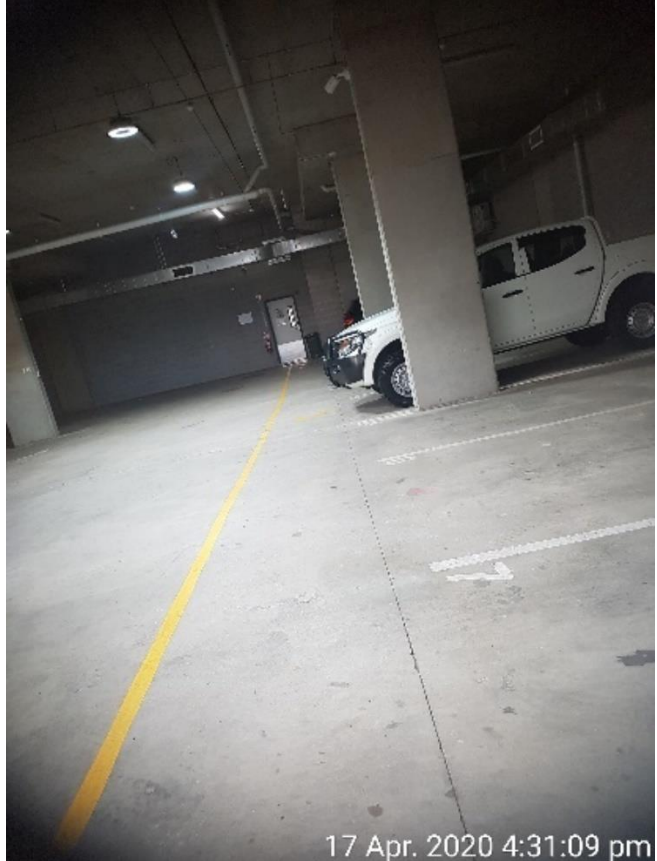


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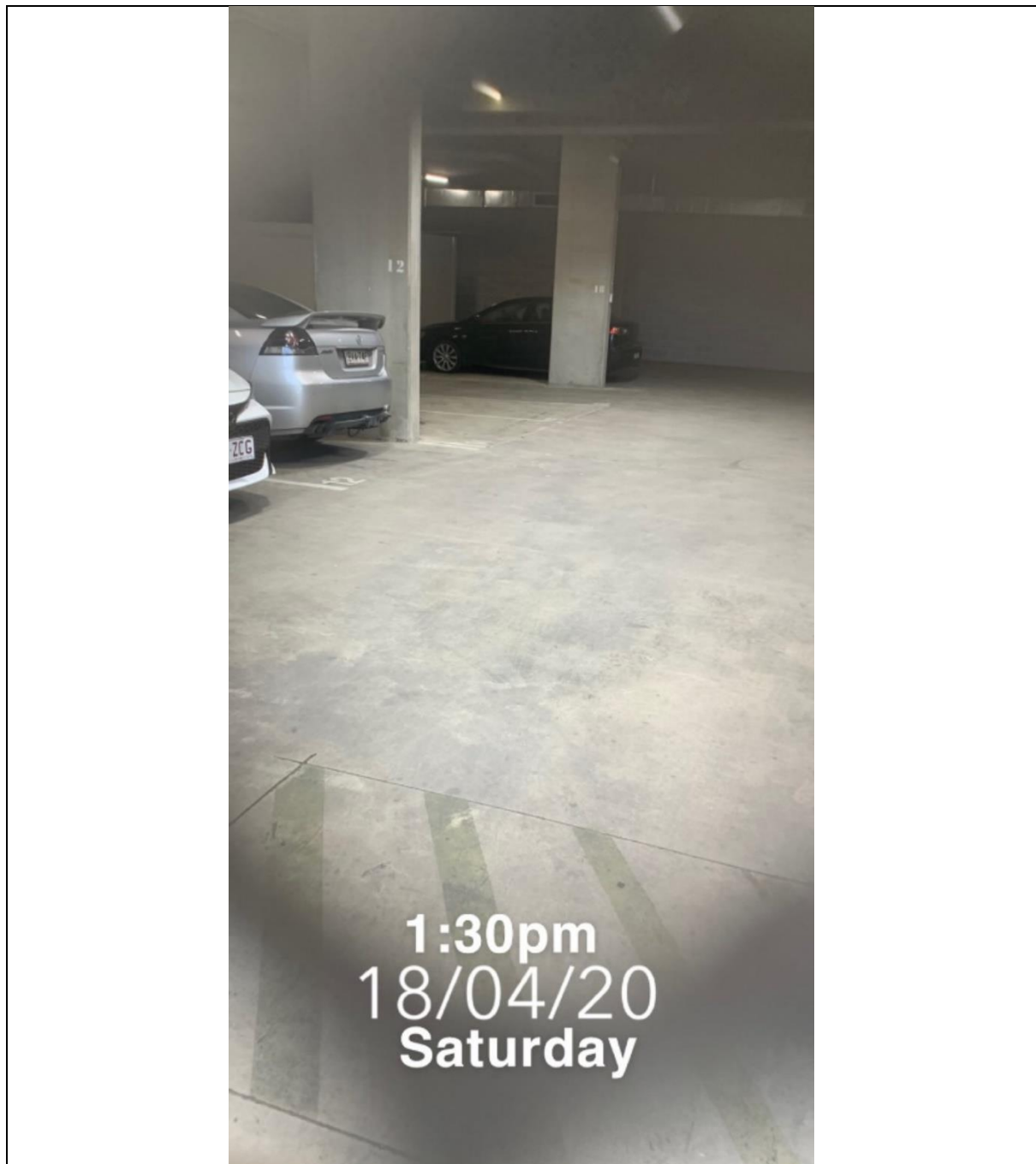
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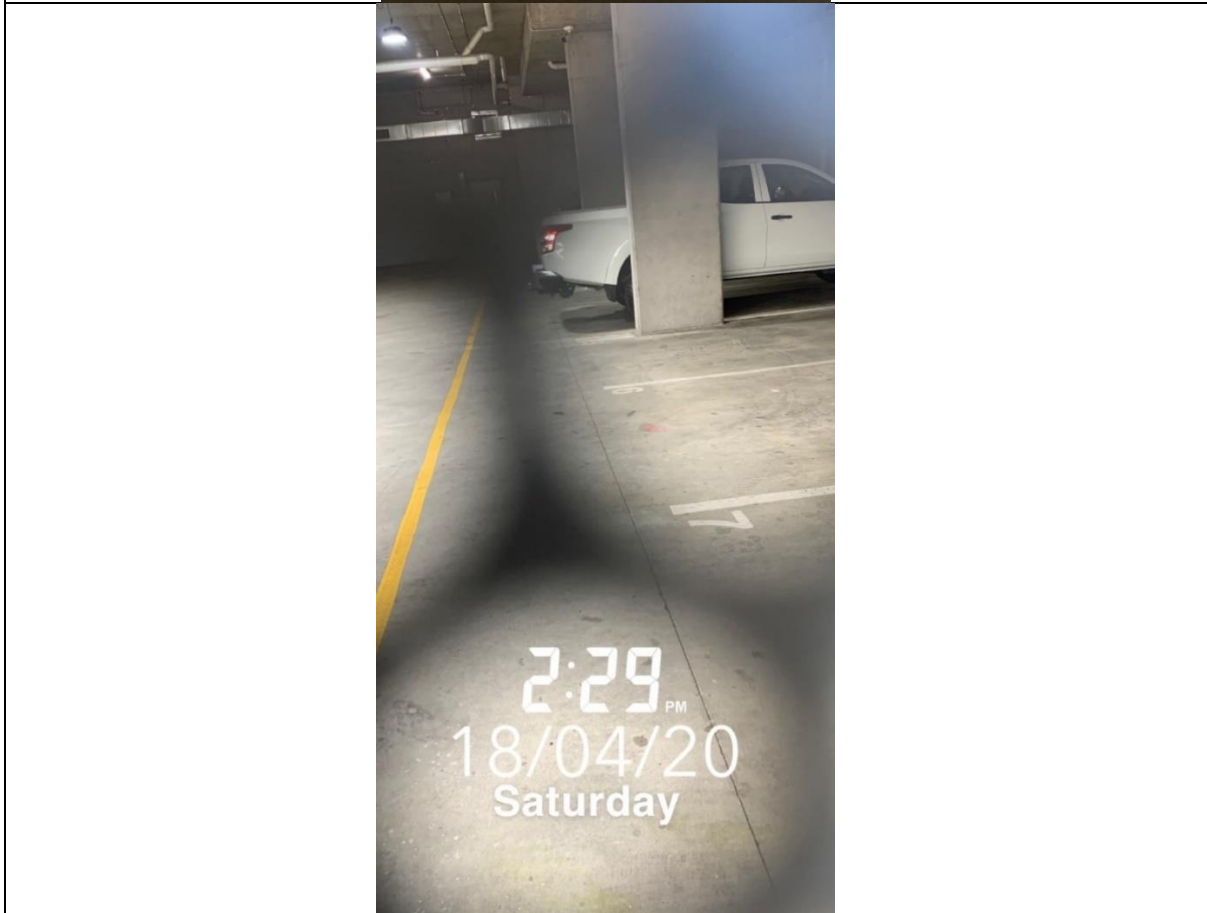
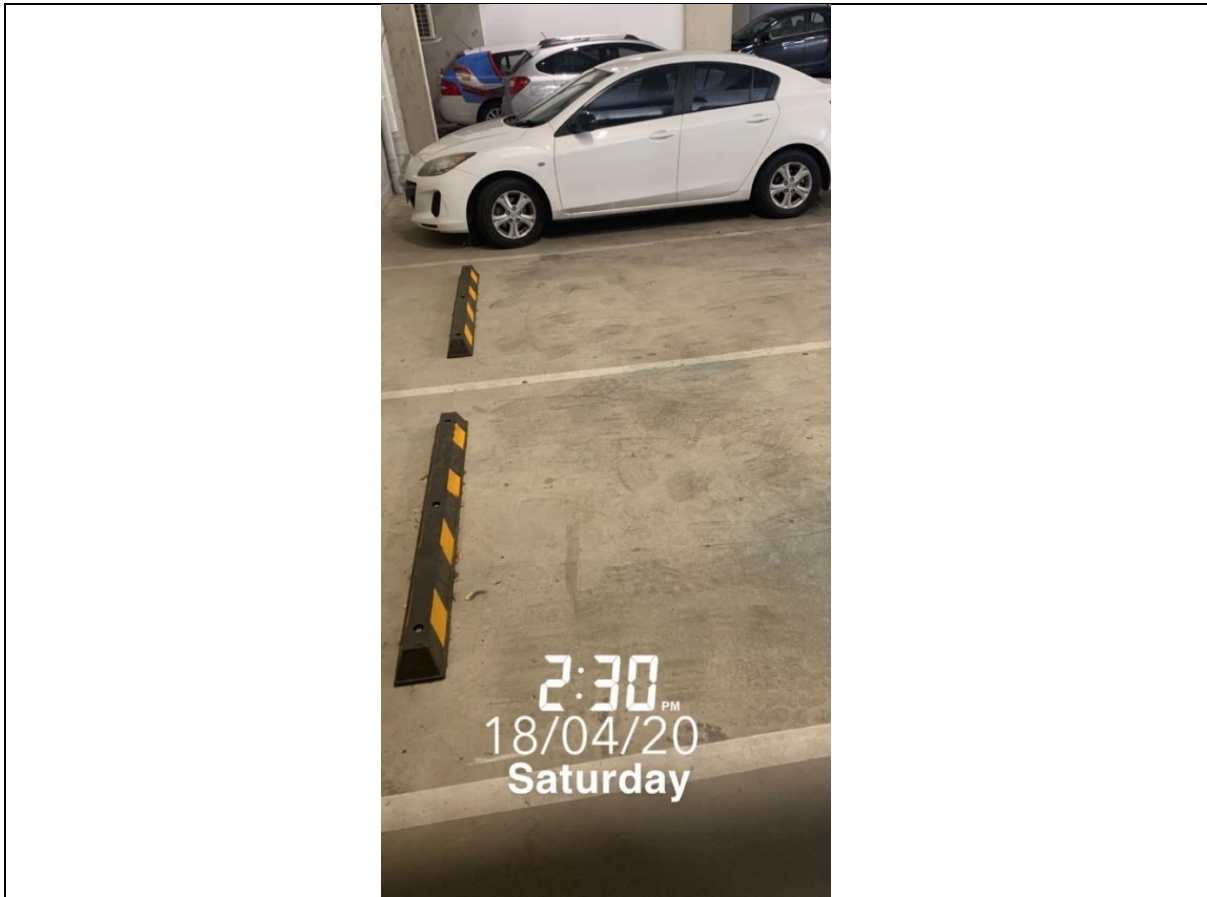
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18/04/2020

Early Afternoon



Later Afternoon



20/04/2020

Morning

