

Client
Clarence City Council

Date
28 July 2026

Planning

Transport

Urban Design

Waste Management

Landscape Architecture

Civil Engineering

ratio.com.au

Transport Engineering

Kangaroo Bay Hotel – Major Project Permit

78 Cambridge Road, Bellerive

Report Prepared by:

Mark Petrusma

Instructed by

Simmons Wolfhagen

ratio:

Project
78 Cambridge Road, Bellerive

Prepared for
Clarence City Council

Our reference
24938T-REP01

Directory path	https://ratioconsultants1.sharepoint.com/sites/24938T/Shared Documents/Work/Reports/24938T-REP01-F01.docx
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1. Statement of Evidence

1.1. Reference

1. Clarence City Council (**'Council'**).
2. Tasmanian Planning Scheme – State Planning Provisions and Clarence Local Provisions Schedule (collectively the **'Scheme'**).
3. 78 Cambridge Road, Bellerive (CT 173171/8, CT 173171/11 and CT 173171/7) (**'Site'**).
4. Kangaroo Bay Hotel Major Project (**'Project'**).
5. Kangaroo Bay Hotel Major Project – Major Project Impact Statement (**'MPIS'**).

1.2. Name and Professional Address

6. Mark Petrusma, Senior Associate of Ratio Consultants Pty Ltd (**'Ratio'**).
7. Located at Level 5, 65 Dover Street, Cremorne VIC 3121.

1.3. Qualifications and Experience

8. Bachelor of Engineering (Civil) (Hons), University of Tasmania, Hobart, 2010.
9. Master of Traffic, Monash University, Melbourne, 2014.
10. Registered Professional Engineer Victoria (Ref No. PE0008118).
11. I have more than 15 years' experience as a Transport Engineer including roles as:
 - Senior Associate – Ratio Consultants Jan 2025 – present
 - Associate – Ratio Consultants March 2024 – Dec 2024
 - Transport Engineer – GHD March 2012 – March 2024
 - Transport Engineer – Midson Traffic November 2010 – March 2012
12. I am a member of the Institute of Engineers Australia and a member of the Victorian Planning and Environmental Law Association.

1.4. Professional Expertise

13. I have worked in the areas of Traffic Engineering and Transport Planning throughout my career. My area of expertise includes traffic engineering design, advice and assessment of a wide range of land use, infrastructure and development proposals for planning authorities, government agencies and private developers.
14. I have provided expert opinion for planning appeals and planning scheme amendments for a variety of land uses and developments in Tasmania including for residential subdivision, multiple dwelling, large retail, sport and recreation, visitor accommodation, function centre, commercial office building, extractive industry, farming and renewable energy generation.

15. I have extensive experience in the design and assessment of car parking and access facilities using the Tasmanian Planning Scheme and Australian Standard AS 2890 Parts 1 to 6. I also have extensive experience in the application of Austroads design guidelines to roads and intersections. I have prepared numerous car parking demand assessments for a wide variety of uses.
16. I believe my training, qualifications and experience over the last 15+ years qualify me to comment on the traffic engineering issues related to this matter. My Curriculum Vitae is attached as **Appendix A**.

1.5. Instructions Defining the Scope of This Report

17. I am instructed by Simmons Wolfhagen on behalf of Clarence City Council. My instructions are summarised in **Section 3.1**, and are referenced as necessary throughout this statement.

1.6. Identity of Persons Undertaking the Work

18. Mark Petrusma, Senior Associate of Ratio Consultants.

1.7. Facts, Matters and Assumptions Relied Upon

19. While preparing this report, I have reviewed and had regard to the following documents. Additional sources of information that have been relied upon have been referenced in the applicable section(s) of this report.

Table 1-1: Reference Documents and Materials

Document	Date
Assessment Criteria – Kangaroo Bay Hotel Major Project	25 February 2025
City of Clarence Representation	1 July 2026
Tasmanian State Planning Provisions	4 March 2026
Clarence Local Provisions Schedule	20 May 2026
Registered Plan of Survey 173171	25 August 2017
Kangaroo Bay Hotel Major Project Impact Statement (MPIS), Volumes 1, 2 and 3	February 2026
Chambroad Australia Representation	30 June 2026
Pitt & Sherry, <i>Traffic Impact Assessment</i> (TIA)	17 February 2026
Pitt & Sherry, <i>Transport and Movement Study</i> (TMS)	13 February 2026
Australian / New Zealand Standard AS/NZS 2890.1, <i>Parking facilities – Part 1: Off-street car parking</i> (AS 2890.1)	5 March 2004
Australian Standard AS 2890.5, <i>Parking facilities – Part 5: On-street parking</i> (AS 2890.5)	9 April 2020

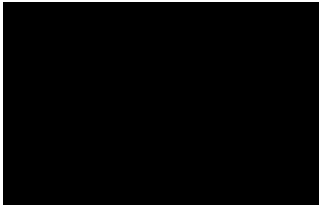
Document	Date
Australian Standard AS 2890.6, <i>Parking facilities – Part 6: Off-street parking for people with disabilities</i> (AS 2890.6)	16 October 2022
<i>Greater Hobart Travel Survey</i>	2019 & 2023
Clarence City Council, Popular Trails in Clarence	July 2024
Department of State Growth, <i>Tasmanian Cycling Infrastructure Design – Tasmanian Walk, Wheel, Ride Guidance</i> (Design Guide)	February 2025
Austroads, <i>Guide to Road Design – Part 6A: Paths for Walking and Cycling</i> (Austroads Part 6A)	February 2021
Initial Assessment Report	19 May 2026

20. I have also relied upon various online mapping resources including LISTMap, Google Maps, Nearmap and Landchecker.

2. Declaration

21. This statement of evidence has been prepared in accordance with the Tasmanian Planning Commission's Practice Note 14. I have made all enquiries which I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Commission.
22. I have attempted at all times in preparing this statement to distinguish between matters of fact, professional opinion and submission.

Signed:



Date:

28th July 2026

3. Introduction

3.1. Overview

23. I have been requested by Simmons Wolfhagen on behalf of Clarence City Council (**'Council'**) to provide my expert opinion with respect to the traffic and parking impacts of the Project.
24. In particular, I have been asked to respond to Criterion 2.1 *'Car Parking and Access'*, Criterion 2.2 *'Traffic and Transport'* and Criterion 1.4 *'Public Domain and Passive Surveillance'* as they relate to my areas of expertise: traffic engineering and transport planning.
25. The list of matters addressed in this statement of evidence is not exhaustive and I have limited my assessment to those traffic and parking factors that I consider to be the key issues with the Project, and relevant to the assessment of the Project against the criteria listed above.
26. In the preparation of this statement of evidence, I have considered the traffic and parking issues raised in the representation submitted by Clarence City Council, dated 1 July 2026. In addition, I have also considered other issues that I deem relevant.

3.2. Structure of This Evidence

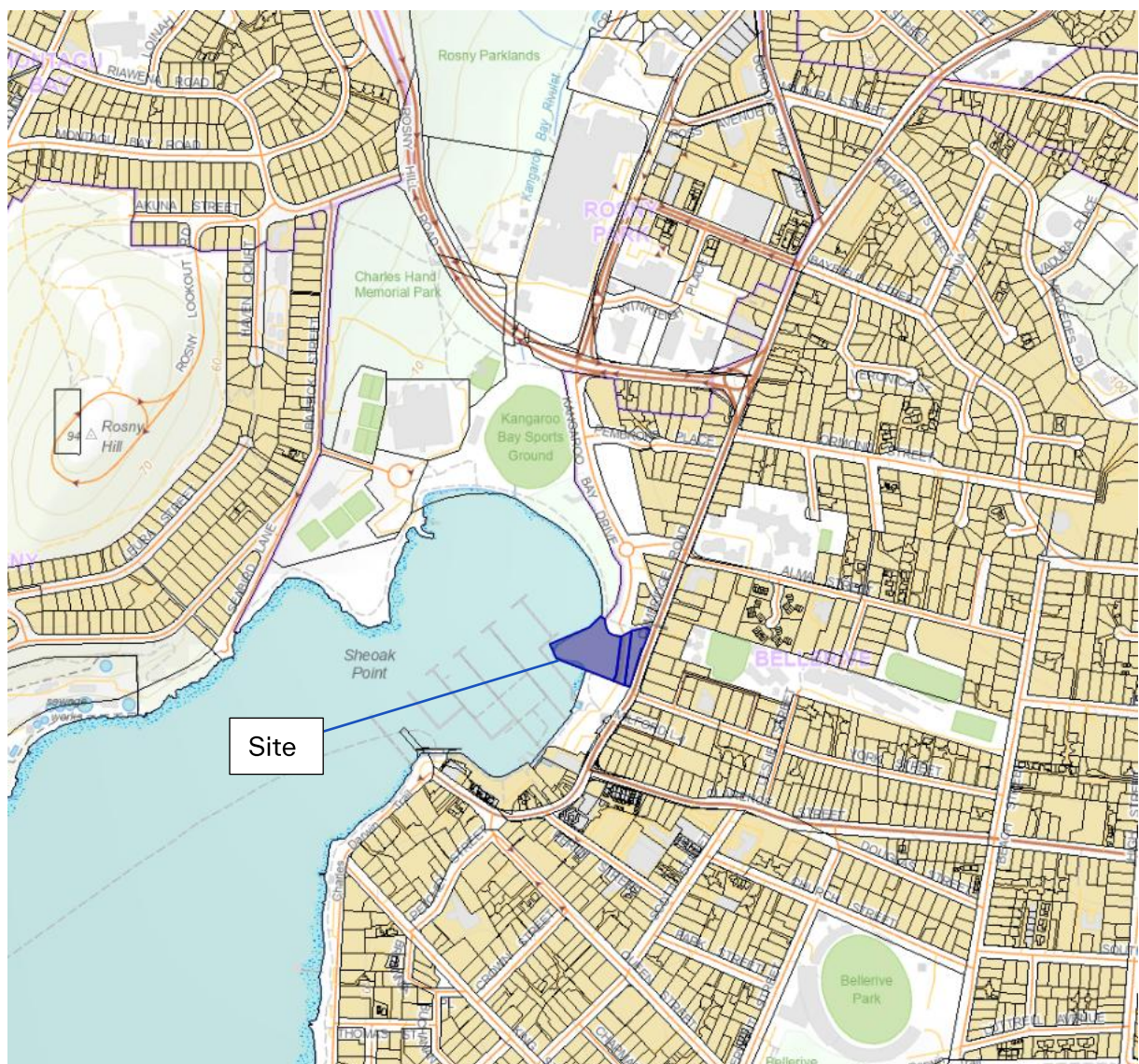
27. My evidence that follows is structured to:
 - a. Provide an overview of the background and context of the Project.
 - b. Review the proposed carpark and access layout for safety, convenience and efficiency.
 - c. Provide an estimate of the actual car parking demand likely to be generated by the Project.
 - d. Review the proposed foreshore trail.
 - e. Assess the Project against the relevant assessment criteria.

4. Background

4.1. Site Context

28. The Site comprises three separate titles addressed as 78 Cambridge Road, Bellerive (CT 173171/8, CT 173171/11 and CT 173171/7). The Site location is shown in Figure 4-1.

Figure 4-1: Site Location



Source: LISTMap (available <https://maps.thelist.tas.gov.au/>)

29. The Site is located at the southern end of Kangaroo Bay Drive and is bounded by Kangaroo Bay to the west, Cambridge Road to the east and the Bellerive Yacht Club and Marina to the south. It has a total area of approximately 0.9 ha.

30. The Site is located within the *Particular Purpose Zone – Kangaroo Bay* (Area C) with specific controls located within Clause CLA-P2.0 of the Scheme.
31. The Site currently contains a driveway and path that provides access to the Bellerive Yacht Club and Marina from Kangaroo Bay Drive, through the Site. This is generally contained to Lot 11 (CT 173171/11). The balance of the site is currently vacant.
32. An aerial photograph of the Site is provided in Figure 4-2.

Figure 4-2: Existing Site Aerial Photograph

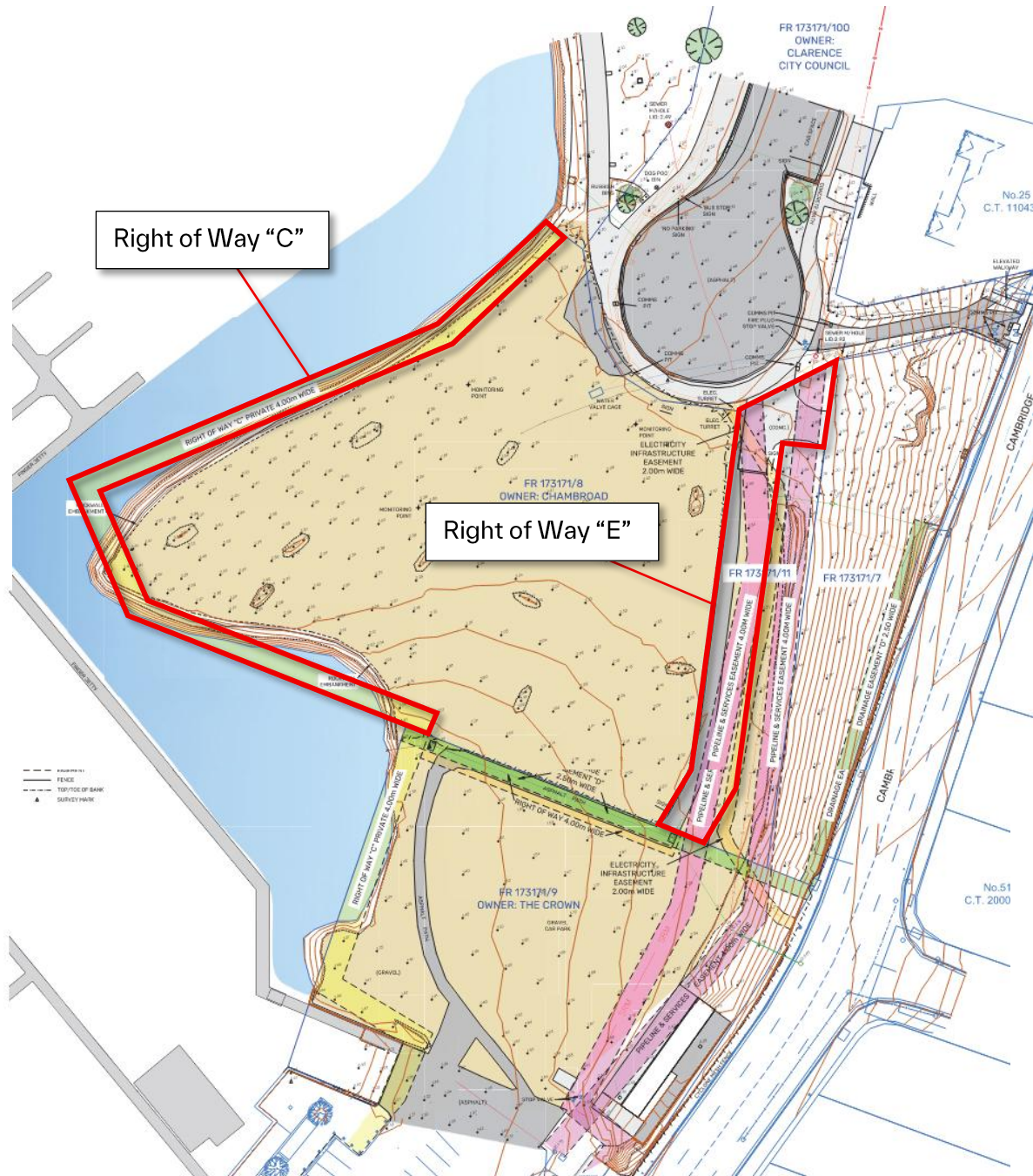


Source: Nearmap Imagery (dated 25/04/2026)

33. The Site is subject to several easements including the following relevant easements:
 - a. CT 173171/8 is subject to Right of Access in favour of Council over Right of Way “C” 4.0m wide,
 - b. CT 173171/11 is subject to Right of Access in favour of Council over Right of Way “E” 8.0m wide and variable width, and
 - c. CT 173171/11 is subject to Right of Carriageway over Right of Way “E” 8.0m wide and variable width appurtenant to Lots 7, 8 and 9¹ and for the benefit of Taswater.
34. The Right of Way easements are shown on the Detail Survey plans prepared by PDA (included in MPIS Volume 2). An extract is presented in Figure 4-3.

¹ Lots 7 and 8 are part of the Site, Lot 9 contains the Bellerive Yacht Club and Marina

Figure 4-3: Right of Way Easements on the Site



PDA, Dwg Nos. 54846AC-DS-02-A and 03-A, dated 08.08.25

35. The title documents define Right of Access and Right of Way as:

- a. **Right of Access** means the full and free right in gross in favour of Council for any member, employee, agent or contractor of Council and every person authorized by it including members of the public, to go, pass and repass at all times and for all purposes on foot or by riding bicycles, wheelchairs, baby-carriages or similar conveyances which are not powered other than by electricity.

For the avoidance of doubt it is the intention of Council to authorise members of the public to use any land which is subject of the Right of Access as part of its shared use tracks and trails and pedestrian walkways networks.

b. **Right of Carriageway** means:

- i. In respect of the rights granted to lots 7, 8 and 9, the meaning given by Schedule 8 of the Conveyancing and Law of Property Act 1884, and
- ii. In respect of the rights granted to Taswater, such rights of access as are necessary and incidental to the exercise by Taswater of the rights conferred by the Pipeline and Services Easement.

4.2. Project Context

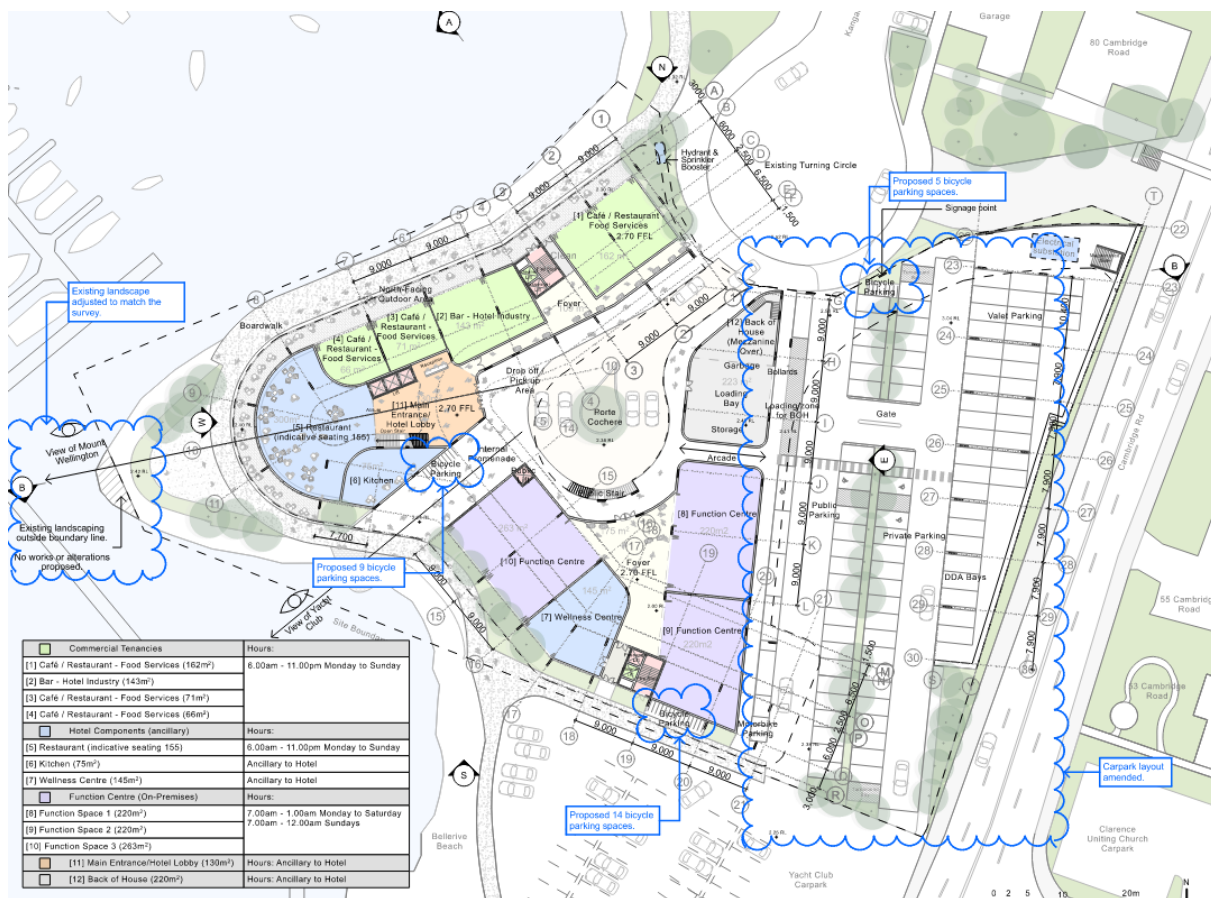
36. The Project Overview (MPIS Volume 1) states that the Project comprises the following components:
- a. 155 guest rooms (including 63 suites),
 - b. Restaurants, cafes and bar,
 - c. Function and conference facilities,
 - d. Guest wellness centre,
 - e. Integrated parking, and
 - f. Extensive publicly accessible waterfront spaces.
37. More specifically, the Project includes the components outlined in Table 4-1.

Table 4-1: Project Summary

Component	Measure
Hotel	155 rooms
Ground Floor Restaurant	300 m ² seating area 155 indicative seating
Tenancy 1 – Café / Restaurant	162 m ²
Tenancy 2 – Bar	143 m ²
Tenancy 3 – Café / Restaurant	71 m ²
Tenancy 4 – Café / Restaurant	66 m ²
Wellness Centre	145 m ²
Function Centre	2x 220 m ² and 1x 263 m ² Maximum capacity 170 each
Car Parking	91 spaces (61 private, 30 public)
Bicycle Parking	28 spaces
Motorcycle Parking	3 spaces
Level 4 Restaurant and Bar	170 m ² seating area

38. The proposed Ground Floor Plan, as included in Attachment B to the Chambroad Australia Representation (dated 30 June 2026), is provided in Figure 4-4.

Figure 4-4: Proposed Ground Floor Plan



Vigilus, Dwg No. A02, Ground, Rev Q (dated 29/06/2026)

39. The MPIS Volume 3 includes a number of reports which are relevant to traffic and parking. The most relevant reports are listed as follows and have been referred to throughout this statement:
- Attachment 20, Traffic Impact Assessment, Pitt & Sherry (dated 17 February 2026) ('TIA').
 - Attachment 21, Transport and Movement Study, Pitt & Sherry (dated 13 February 2026) ('TMS').
40. I have also referred to the representation submitted by Chambroad Australia, dated 30 June 2026, which provides further clarification on traffic and parking matters and was partially authored by Pitt & Sherry.

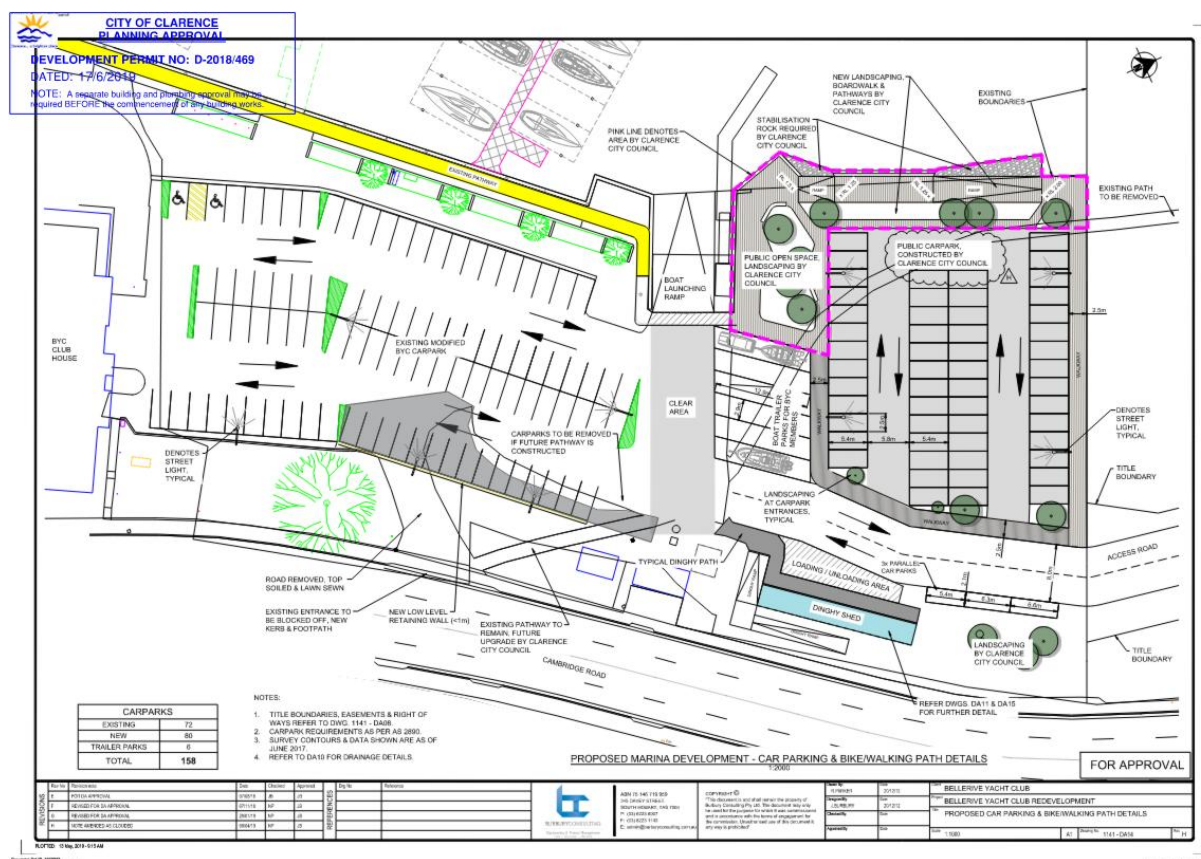
4.3. Development Context

64A Cambridge Road, Bellerive

41. The land parcel located immediately to the south, addressed as 64A Cambridge Road, Bellerive (CT 173171/9) has two recently approved permits which, to my understanding, are currently valid.

42. Permit No. D-2018/469, as amended by PDPPAMEND-2021/021411 (dated 4 November 2021), expanded the number of berths at the Marina from 176 to 226 and included a range of additions and modifications to the existing Bellerive Yacht Club and Marina carpark, boat launching facilities, pathways and landscaping.
43. It notably includes the removal of the existing direct access to Cambridge Road and construction of car parking and a retaining wall in its place. Access to the property would be solely via the Right of Way through the Site (CT 173171/11).
44. It further includes formalisation of the existing gravel carpark to be constructed by Council, as well as dedicated boat and trailer parking.
45. The carpark detail plan approved under D-2018/469 is provided in Figure 4-5.

Figure 4-5: Approved Car Parking Plan – D-2018/469



Source: Burbury Consulting, Dwg No. 1141-DA14 Proposed Marina Development – Car Parking & Bike/Walking Path Details, Rev H (dated 08/04/19)

46. Permit No. PDPLANPMTD-2024/042893, dated 19 August 2024, included a new marina arm providing 26 additional berths. It retained the carparking and access modifications approved as per Permit No. D-2018/469 (Figure 4-5 above).
47. The carpark and access general arrangement plan approved under PDPLANPMTD-2024/042893 is provided in Figure 4-6.

**CITY OF CLARENCE
PLANNING APPROVAL**

DEVELOPMENT PERMIT NO: DP/PLAN/PTD-2024/042803
DATED: 19 August 2024

NOTE: A corresponding engineering and plumbing approval may be required (S273/2018) the commencement of any building works.

NEW 'ARM C'

BOAT RAMP PONTON REMOVED

NEW 'ARM C' GANGWAY ACCESS FROM EXISTING BOAT RAMP ABUTMENT

CARPARK PER PLAYSTREET FOR COUNCIL AS PER APPROVED PERMIT D2018/469

BVC CAR PARK TO APPROVED PERMIT D2018/469

NEW ACES FROM WARRAMBOOL BAY DRIVE

CAMBRIDGE ROAD

BELLARINE YACHT CLUB

CAR PARK & ACCESS GENERAL ARRANGEMENT PLAN
1:500

NOTE: FOR GENERAL NOTES REFER TO DRAWING 1055 - 101.

FOR APPROVAL

BELLARINE YACHT CLUB INC.
BELLARINE YACHT CLUB - ARM C PROPOSAL
CAR PARK & ACCESS GENERAL ARRANGEMENT PLAN

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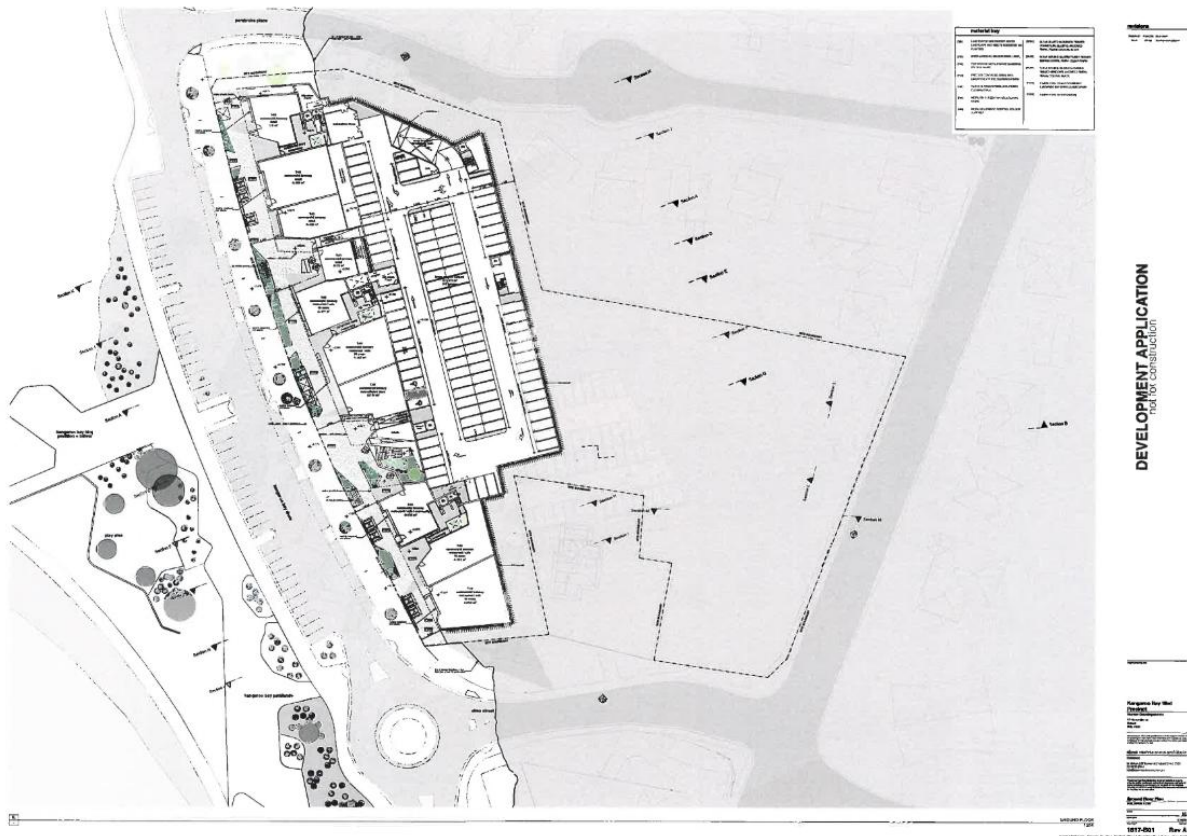
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30 Kangaroo Bay Drive

48. The vacant land parcels to the north of the Site, addressed as 30 Kangaroo Bay Drive (CT 173171/3) and 7 Pembroke Place (173171/4), and incorporating 92, 94, 96 and 98 Cambridge Road, also has an approved permit for a large commercial/residential development.
49. Permit No. PDPLANPMTD-2020/011070 would provide for 86 multiple dwellings, 249 car parking spaces across three levels and 10 tenancies comprising 1,277 m² of retail, food services and museum on ground floor fronting Kangaroo Bay Drive.
50. The development would provide sufficient parking for non-residential uses in accordance with the relevant acceptable solution of the Planning Scheme that was in effect at the time. A reduction of 42 spaces (~23% of normal requirements) for the residential use was accepted by Council under the performance criteria.
51. It is my understanding that the permit was extended under Section 53 of the *Land Use Planning and Approvals Act* (**'LUUPA'**) and the permit now expires on 9 November 2027, unless substantially commenced.
52. The ground floor plan of the development approved under PDPLANPMTD-2020/011070 is provided in Figure 4-7.

Figure 4-7: Approved Ground Floor Plan – PDPLANPMTD-2020/011070

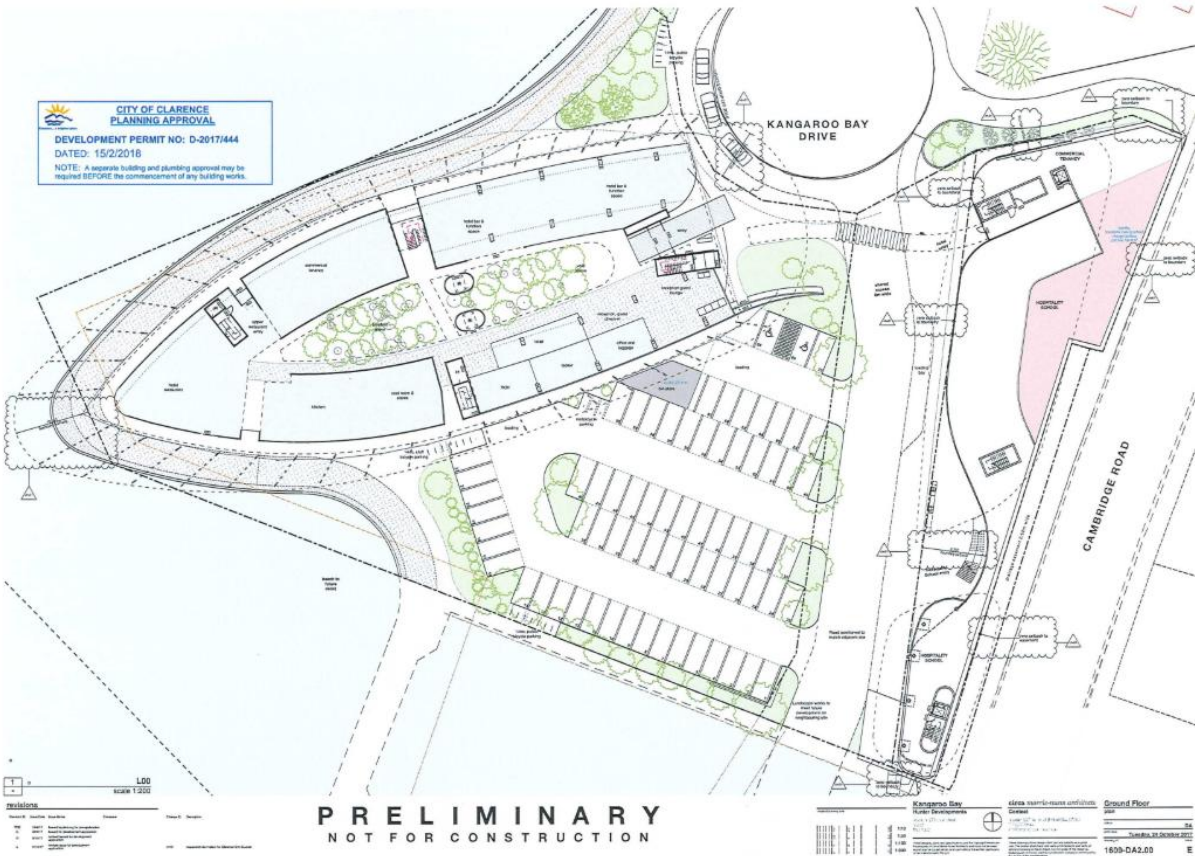


Source: Circa Morris Nunn Architects, Dwg No. 1617-B01 Ground Floor Plan, Rev A

78 Cambridge Road

53. The subject Site at 78 Cambridge Road was the subject of a historic development permit no. D-2017/444 which was approved by the Resource Management and Planning Appeal Tribunal ('RMPAT') on 15 February 2018 (Appeal No. 03/18P).
54. The approved development would include a hotel with 110 rooms, restaurants, bar and function space, commercial tenancy and hospitality school.
55. A total of 70 car parking spaces would be provided, which represented a reduction of 73 car parking spaces against the normal requirements of the Planning Scheme in effect at the time. Condition 4 of the Permit would require a cash contribution to be provided in lieu of the 73 car parking spaces that could not be provided on the site.
56. The development approved under Permit No. D-2017/444 would retain an 8-metre wide driveway connection between Kangaroo Drive and the Bellerive Yacht Club and Marina carpark.
57. It is understood that this permit is no longer in effect.
58. The ground floor plan of the development approved under Permit No. D-2017/444 is provided in Figure 4-8.

Figure 4-8: Approved Ground Floor Plan – D-2017/444



Source: Circa Morris Nunn Architects, Dwg No. 1609-DA2.00 Ground Floor Plan, Rev E dated 24 October 2017

5. Summary of Opinion

59. The opinions expressed in this Statement of Evidence can be summarised briefly as follows:
60. The proposed carpark layout contains numerous design deficiencies, operational issues and safety hazards. It is recommended that a substantial redesign of the carpark and Right of Way is required to resolve major layout issues.
61. The TIA significantly underestimates the car parking demand resulting from the Project, particularly with respect to the Restaurants and Commercial Tenancies on the Site, and functions held during weekdays and Saturdays.
62. The Project is likely to generate parking demand for up to 178-241 vehicles (depending on events held). This results in an overflow parking demand of 87-97 vehicles typically.
63. The capacity of the surrounding area to accommodate additional parking is effectively zero during weekdays and on Saturdays. Accordingly, the overflow parking demand from the Site will cause significant detriment to existing users of public parking facilities and may push existing parking activity further out into residential areas.
64. It is recommended that the potential for additional parking supply at the Site should be explored, including consideration of a multi-level carpark.
65. The proposed shared user path on the Site, to form part of the Clarence Foreshore Trail, should ensure a minimum width of 4.0 metres between obstructions either side.
66. In its current form, the Project fails to demonstrate compliance with Assessment Criterion 2.1 (a), (b) and (d).
67. The Project has demonstrated compliance with Assessment Criterion 2.2.
68. In its current form, the Project fails to demonstrate compliance with Assessment Criterion 1.4 (a) and (b).
69. If the Project is approved, then a number of conditions are recommended including:
 - a. A detailed Waste Management Plan and Loading Management Plan should be prepared for endorsement by the relevant authority to ensure that appropriate mitigation measures are in place to manage the risks associated with loading activity.
 - b. A cash contribution towards Council, to be calculated based on the ultimate car parking deficiency, to assist Council to develop additional public parking facilities in the local area so that future parking demands can be accommodated.

6. Carpark and Access Layout

6.1. Review of Australian Standards

70. Australian / New Zealand Standard AS/NZS 2890.1, *Parking facilities – Part 1: Off-street car parking* (2004) (**‘AS 2890.1’**), is the applicable standard governing the design of car parking facilities in Australia.

Car Parking Facility Classification

71. Table 1.1 of AS 2890.1 provides a guide to the classification of off-street car parking facilities, which in turn affects the recommended parking space widths and manoeuvring widths.
72. The TIA (Section 4.3.2 on p55) adopts User Class 2 as the appropriate classification. The examples of uses for User Class 2 include *‘Long-term city and town centre parking, sports facilities, entertainment centres, hotels, motels, airport visitors (generally medium-term parking)’*.
73. Given the context of the proposed carpark, I agree with this classification for the private car parking spaces. However, for publicly accessible car parking spaces I would prefer a higher classification of User Class 3. This is based on the following:
- a. The TIA (Section 3.3 on p22) states that the publicly accessible parking spaces would be time-restricted, essentially limiting these spaces to short-term, high-turnover use only.
 - b. Parking spaces are accessed from a driveway over which the Council would have a Right of Access, which effectively elevates it to have a similar function to a public road. For high turnover parking (i.e. 2 hours or less), Australian Standard AS 2890.5, *Parking facilities – Part 5: On-street parking* (2020) (**‘AS 2890.5’**), requires a space width of 2.6 metres consistent with User Class 3.
 - c. Note 1 to Table 1.1 of AS 2890.1 states that *“the examples of uses are intended to be flexible and allow for progressive improvement both in the ease of manoeuvring into and out of parking spaces, and in leaving and re-entering the vehicle as one progresses up the user class scale from 1 to 3A.”*
 - d. A higher classification is warranted due to the complex nature of the car parking area which provides 90-degree angle parking, parallel parking, cyclists, and vehicles (including cars, trucks and boat trailers) accessing the Bellerive Yacht Club and Marina.

Car Parking Width

74. In my opinion therefore, the proposed parking space width of 2.5 metres for publicly accessible, 90-degree parking spaces is deficient and should be increased to 2.6 metres in line with the normal requirements for User Class 3, and consistent with high turnover parking spaces.

Car Parking Length

75. AS 2890.1 provides that the minimum length of parking spaces under normal circumstances is 5.4 metres. An allowance for a length of 4.8 metres is made where parking is to a low kerb which allows 600 mm overhang in accordance with Clause 2.4.1(a)(i) which states:
- a. *“End overhang – where a vehicle may overhang the end of a space, e.g. at a kerb, provided the first 600 mm immediately behind it is unobstructed, is not another parking spaces and is not required as a footway or for some similar purpose, space lengths measured parallel to the parked vehicle may be reduced by 600 mm.”*
76. The TIA (Table 30 on p56) states that the minimum parking space length to a low kerb is 4.8 metres. While this is technically correct, the TIA fails to appropriately consider the requirements of Clause 2.4.1(a)(i) that this area be unobstructed and not be required for another purpose.
77. The ‘low kerb’ which is intended to allow overhang measures 1.2 metres in width. This is inferred from dimensions provided on the Car Park General Arrangement Plan (pitt&sherry, Dwg No. S-P.23.0373-00-CIV-SKT-5000, Rev A). This is intended to allow 600 mm overhang from publicly accessible 90-degree angle spaces (4.8 m in length) and private 90-degree angle spaces (4.8 m in length). An extract is provided in Figure 6-1.

Figure 6-1: Car Parking Dimensions

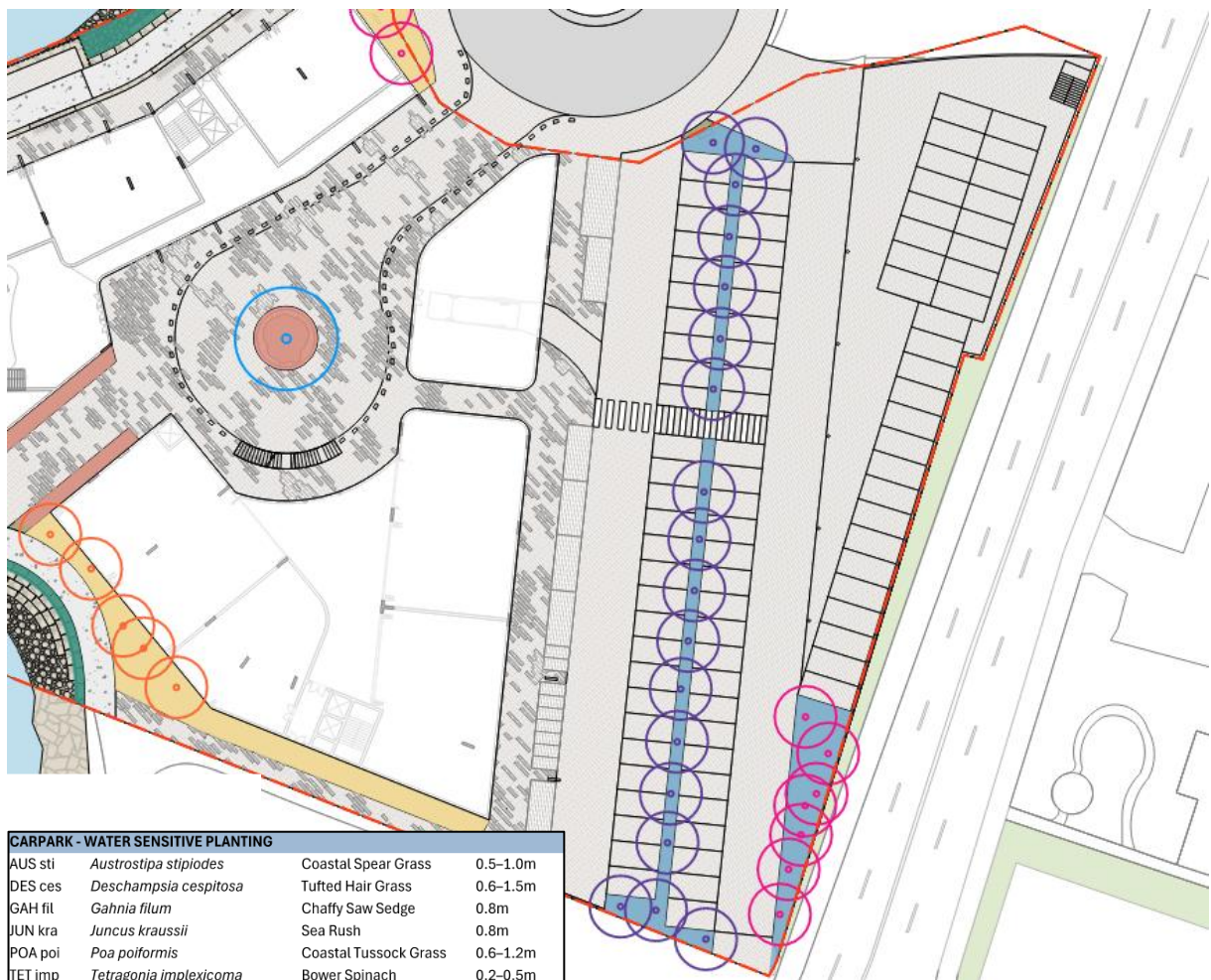


Source: Extract from pitt&sherry, Dwg No. S-P.23.0373-00-CIV-SKT-5000 – Car Park General Arrangement, Rev A (dated 31/10/2025)

78. There are several inconsistencies in the documentation that must be resolved:

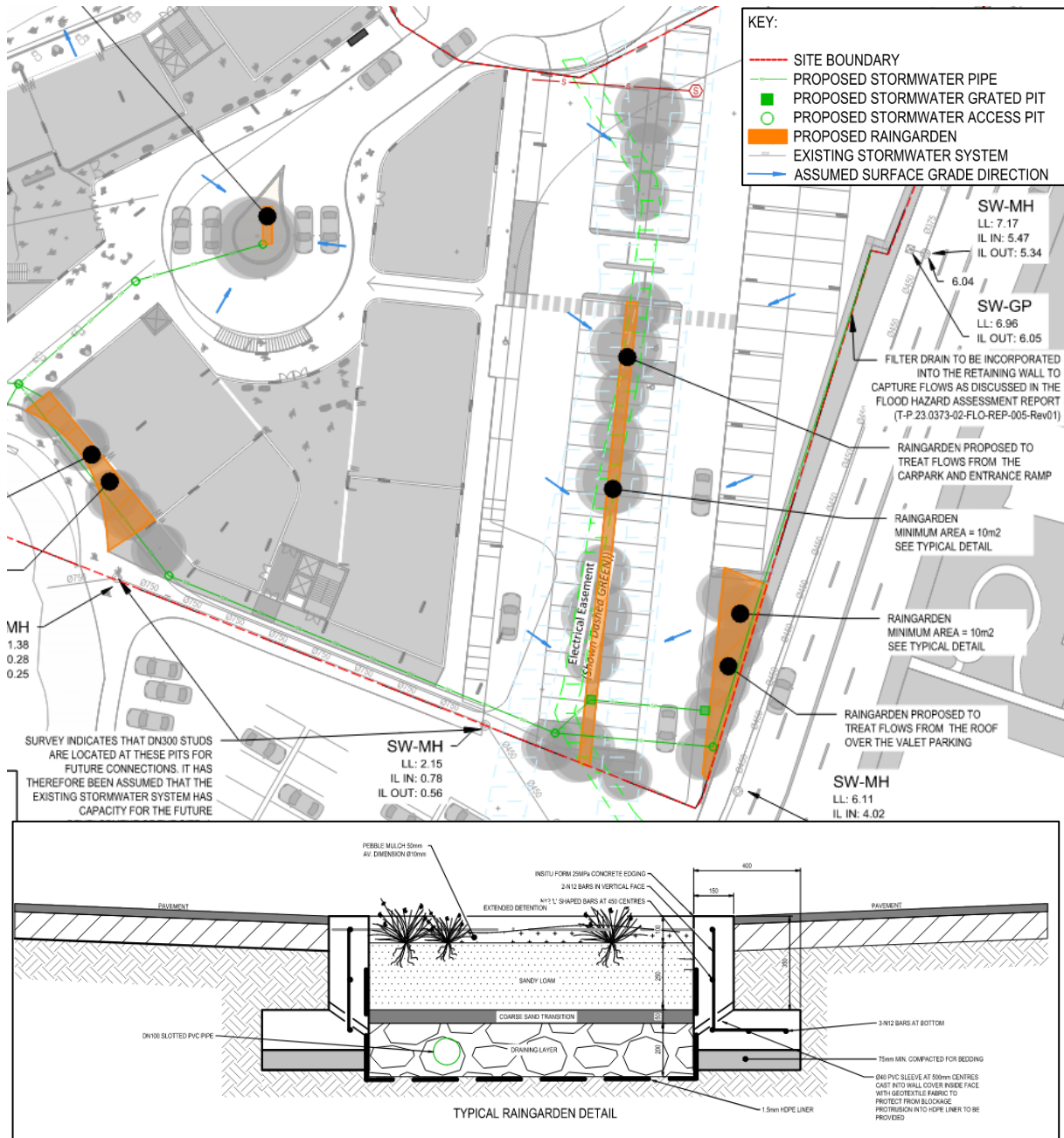
- a. The landscape architecture plan prepared by Realm Studios shows tree planting within this area, along with a range of other grasses and shrubs having typical heights of up to 1.5 metres. Any planting greater than 0.15 metres in height in this area would obstruct the ability for vehicles to overhang (refer Figure 6-2).
 - b. The Concept Stormwater Design prepared by pitt&sherry shows this part of the carpark as being a Proposed Raingarden, and integral to the stormwater treatment strategy for the Site. The Typical Raingarden Detail excludes kerbs and it is unclear whether the inclusion of kerbs or wheelstops (as required to prevent encroachment) would impact the effectiveness of the raingarden (refer Figure 6-3).
79. Based on the above inconsistencies, it is unclear whether the area between the two rows of parking is suitable to accommodate 600 mm of front overhang in accordance with Clause 2.4.1(a)(i) of AS 2890.1.
80. At the very least, the proposed arrangement is unorthodox and not commonly encountered in Tasmania. Even if suitable wheelstops or kerb are provided, and planting is sufficiently low to allow overhang, there remains a relatively high likelihood that parked vehicles will overhang the rear of the car parking space and encroach the parking aisle.
81. Given 30 public car parking spaces in the row, it would only take less than 5% of drivers to be uncomfortable with the front overhang arrangements to cause an obstruction of the aisle.

Figure 6-2: Landscape Plan - Carpark



Source: Extract from Realm Studios, Dwg No. 23651-00-L106 – GF_Concept Plan_Planting

Figure 6-3: Concept Stormwater Design – Carpark



Source: Extract from pitt&sherry, Dwg No. S-P.23.0373-00-DRN-DRG-0001 – Concept Stormwater Design General Arrangement, Rev E (dated 24/06/2026)

Accessible Carparking

82. The requirements for accessible car parking are set out in Australian Standard AS 2890.6, *Parking facilities – Part 6: Off-street parking for people with disabilities* (2022) (**'AS 2890.6'**).
83. The minimum length of an accessible car parking space is 5.4 metres. This is acknowledged in the TIA which states the following in Note 1 to Table 30 (on p56): *'It is noted that AS2890.6 does not specify the acceptance of a 4.8m length space to a kerb, as this arrangement is equivalent to a 5.4m length space with a wheelstop, this length space is considered acceptable.'*

84. In my view, the reason that AS2890.6 does not specify the acceptance of a 4.8 metre length space is simply because it is not acceptable. I further note that the implicit assumption in the TIA is that an accessible parking space with a wheelstop would otherwise be acceptable. However, this is in conflict with AS 2890.6 Clause 2.6 Pavement Slope and Surface which states that *"The surface shall be free of any elements that may present a hazard to pedestrians."* A wheelstop or low kerb would fall into this category as a potential trip hazard affecting accessibility.
85. Accordingly, the proposed accessible car parking spaces being restricted to a length of 4.8 metres is unacceptable, and the full 5.4 metre length should be provided.

6.2. Parallel Car Parking Bays

86. The proposed carpark includes six parallel parking bays and a parallel loading zone. These spaces are located along the western side of the parking aisle and therefore must be accessed in the northbound direction.
87. Given that there is no on-site turning provided, the parallel parking bays and loading zone can only be accessed by relying on the property to the south. That is, cars and service vehicles must either:
- a. Enter the proposed carpark from Kangaroo Bay Drive, travel through the Site, perform a U-turn within the Bellerive Yacht Club and Marina site, and then re-enter the proposed carpark from the south, or
 - b. Enter the Bellerive Yacht Club and Marina site from the Cambridge Road access, travel through the Bellerive Yacht Club and Marina carpark, and then enter the proposed carpark from the south.
88. It is noted that the second alternative would only be available in the interim period, prior to the planned closure of this access point as approved under Permit No. D-2018/469 (refer Figure 4-5).
89. To my knowledge, the subject Site has no right of carriageway over the land to the south and so the proposed arrangements are unworkable.
90. Furthermore, the introduction of U-turns to the Bellerive Yacht Club and Marina carpark, an area that is subject to pedestrian and cycling activity, parking manoeuvres and reversing of boat trailers, would be a poor outcome from a traffic circulation and safety perspective. The requirement for service vehicles (including medium to large rigid trucks) to perform these movements is particularly problematic.

6.3. Loading

91. In addition to the parallel loading zone along the parking aisle (described in **Section 6.2** above), the Project would provide a dedicated loading bay within the proposed building. This is shown on the Ground Floor Plan (Vigilus, Dwg No. A.02 – Ground, Rev Q) and on the Car Park General Arrangement Plan (pitt&sherry, Dwg No. S-P.23.0373-00-CIV-SKT-5000, Rev A).
92. The TIA discussed the design of the loading bay (in Section 4.3.4 on p57) and the operation of the loading bay (in Section 4.4 on p58).
93. An extract from the Car Park General Arrangement Plan is provided in Figure 6-4. The proposed arrangement, introduces a major point of conflict to the carpark by requiring waste collection and delivery vehicles to reverse over the main pedestrian crossing from the carpark.

This crossing also forms part of the accessible path of travel from accessible car parking spaces to the building.

94. This presents a significant safety risk which has not been adequately addressed in the TIA, and the proposed recommendation for a 'spotter' is insufficient to mitigate the risk. There are multiple points of conflict that cannot be reasonably managed by a single spotter including:
- Pedestrians crossing the zebra crossing (both directions)
 - Cyclists and other vehicles travelling north-south along the driveway
 - Vehicles entering and exiting car parking spaces
 - Pedestrians using the footpath

Figure 6-4: Loading Bay Access



Source: Extract from pitt&sherry, Dwg No. S-P.23.0373-00-CIV-SKT-5000 – Car Park General Arrangement, Rev A (dated 31/10/2025)

95. The TIA (in Section 4 on p58) indicates that the loading bay would be utilised very infrequently and '*no more than 1-2 times per day*'. This is based on erroneous assumptions.
96. For example, the TIA states that '*rubbish collection is to occur within the loading zone twice a week.*' This significantly underestimates the amount of waste collection movements required. In my experience, a development of this size would typically require 2-3 collections per waste stream per week depending on the size and number of bins. Assuming three waste streams (rubbish, recycling, and food and organics) there would be around 6-8 collections per week.
97. In addition to waste collection, there are multiple restaurants and commercial tenancies which will each need access to the loading bay on a regular basis.

98. It is possible that the loading bay could be used several times per day given the activities on the site. The expected frequency of access, combined with the risks inherent to the design of the carpark, require a more substantial impact mitigation plan in order to maintain a safe environment for all road users.

6.4. Right of Carriageway and Right of Access

99. As described in **Section 4.1** of this statement, the Site is subject to a number of easements. The following discussion relates to Right of Way “E” which is located on Lot 11 (CT 173171/11) and is shown on Figure 4-3.
100. Right of Way “E” has a width of 8.0 metres offset from the western boundary between Lot 8 and Lot 11 within the Site, except for the northern end of the Right of Way near Kangaroo Bay Drive which is widened to provide access to Lot 7.
101. Having regard to the Schedule of Easements on registered plan 173171 it is understood that Lots 7, 8 and 9 have a Right of Carriageway over Right of Way “E” which has the normal definition as per Schedule 8 of the *Conveyancing and Law of Property Act 1884* as follows:
- a. *‘Full and free right for every person who is at any time entitled to an estate or interest in possession in the land herein indicated as the dominant tenement or any part thereof with which the right shall be capable of enjoyment, and every person authorized by him, to go, pass, and repass at all times and for all purposes with or without animals or vehicles or both to and from the said dominant tenement or any such part thereof.’*
102. Lot 9 is the land located immediately to the south of the Site (i.e. 64A Cambridge Road) and contains the Bellerive Yacht Club and Marina. Direct access to Cambridge Road would be removed as part of approved permit No. D-2018/469 which to my knowledge is still in effect. The sole access to the Bellerive Yacht Club and Marina site would be via Right of Way “E”.
103. The types of users and trip purposes using Right of Way “E” are as follows:
- a. General public (cars) utilising 152 car parking spaces (post-development) at 64A Cambridge Road.
 - b. Cars towing boat trailers accessing the boat launching ramp.
 - c. Construction vehicles associated with regular maintenance of the Marina.
 - d. Waste collection and delivery vehicles.
 - e. Cyclists and pedestrians.
104. The proposed driveway is deficient with respect to the Right of Carriageway due to the reduced width (6.5 metres compared to 8.0 metres), the high probability of partial blockage due to rear overhang of vehicles (refer to Paragraph 80 and 81 above) and the risk of user conflict due to direct access to parking.
105. Right of Way “E” is also subject to Right of Carriageway for the benefit of Taswater for the purpose of managing the infrastructure assets located within the Pipeline and Services Easement also on the Site. Based on Section 2.3.2 of the Infrastructure Services Report (pitt&sherry, 13 February 2026), I understand this to include an existing gravity sewer main and an existing sewer rising main – both of which pass through the Site.
106. The specific access requirements of Taswater are unclear from the documentation provided within the MPIS, and to my knowledge, Taswater have not submitted a representation. It is

noted that the proposed carpark does not include any dedicated hardstand or truck parking area for Taswater maintenance vehicles.

107. In addition to Right of Carriageway, there is also a Right of Access recorded over Right of Way “E”. This is defined in the Schedule of Easements on registered plan 173171 as follows:

a. **Right of Access** means the full and free right in gross in favour of Council for any member, employee, agent or contractor of Council and every person authorized by it including members of the public, to go, pass and repass at all times and for all purposes on foot or by riding bicycles, wheelchairs, baby-carriages or similar conveyances which are not powered other than by electricity.

For the avoidance of doubt it is the intention of Council to authorise members of the public to use any land which is subject of the Right of Access as part of its shared use tracks and trails and pedestrian walkways networks.

108. The clear intent of the Right of Access is to provide a high-quality walking and cycling route through the Site, integrating with paths to the north and south. This is discussed further in **Section 8** of this statement.
109. The current carpark layout is not conducive to safe and convenient cycling. The driveway provides direct access to 90-degree angle parking which introduces a safety risk as a result of vehicles pulling out in front of cyclists, and regular obstruction due to parking manoeuvres (including reversing manoeuvres).
110. The footpath which runs along the building is not wide enough to operate as a shared use path, and is subject to obstruction and safety hazard due to vehicle doors.
111. It is further noted that the alignment of the parking aisle within the proposed carpark is not consistent with the position of Right of Way “E” as recorded on the title. Furthermore, it does not align with, and does not appear to be compatible with, the approved carpark development at 64A Cambridge Road as per permit No. D-2018/469.

6.5. Coordination of Structural Design

112. I note that the updated Ground Floor plan contained within the Chambroad Representation (Vigilus Dwg No. A.02 Ground, Rev Q dated 29/06/2026) appears to show columns encroaching parking spaces and the parking aisle. Further coordination of the structural design would be required to ensure adequate clearance to columns and other vertical obstructions.

6.6. Access to Private Parking Area

113. The proposed carpark is separated into two sections:
- A public parking area with spaces accessed directly from the main driveway (which also forms the primary access to the Bellerive Yacht Club and Marina), and
 - A private parking area accessed via boom gates.
114. The access way to the private carpark has a proposed width of 6.5 metres and includes a 0.5 metre wide median required to house boom gate infrastructure. The space provided appears to be insufficient to provide for vehicles to turn into and out of this accessway with appropriate clearances to the median island and/or vertical obstructions. It is also likely that the 0.5 metre wide median is insufficient to contain all of the infrastructure required.
115. No swept path assessments have been provided to demonstrate that access between the two carparks is suitable.

116. If widening of the accessway is required, either to support a wider median to house boom gates or to permit turning into and out of the carpark by the design vehicle (the B99 vehicle), then the available car parking supply will be affected.

6.7. Summary of Key Issues and Recommendations

117. There are a number of issues arising from the current design of the proposed carpark as described in **Sections 6.1 to 6.4** above. These are summarised briefly as follows:
- a. Deficient width of publicly accessible parking spaces (2.6 m preferred over 2.5 m).
 - b. Deficient length of 90-degree angle spaces (5.4 m preferred over 4.8 m) and a lack of clarity around whether the front overhang arrangement is feasible.
 - c. High likelihood of vehicles overhanging the parking aisle, which also forms the primary access to the Bellerive Yacht Club and Marina.
 - d. Deficient length of accessible car parking spaces (5.4 m required and only 4.8 m provided).
 - e. Parallel parking spaces and parallel loading zone cannot be accessed without reliance on neighbouring land.
 - f. Proposed loading bay access arrangements introduce multiple points of conflict with pedestrians, vehicles and cyclists which are not sufficiently managed.
 - g. Access between the two car parking areas appears to be insufficient for the relevant design vehicle (B99 vehicle) given the requirement to house boom gate infrastructure within a central median.
 - h. Proposed driveway access does not align with Right of Way “E” and is not compatible with the approved carpark under Permit No. D-2018/469.
 - i. The proposed driveway does not provide for safe cycling for the purpose of the Right of Access over Right of Way “E”.
118. These issues, while significant in the context of the design, are not insurmountable. A redesign of the proposed carpark could conceivably address the concerns raised in the above sections.
119. In my opinion, a redesign of the carpark should consider the following recommendations:
- a. Maintain an 8-metre-wide movement corridor through the site, free and clear of parking and other obstructions (including overhead clearance), and suitable for use by vehicles, pedestrians and cyclists.
 - i. The preferred outcome would include a separated shared use path connection within the movement corridor.*
 - b. Ensure compatibility with the approved carpark located at the Bellerive Yacht Club and Marina.
 - c. Provide sufficient on-site turning so that there is no reliance on land over which the Site has no right of carriageway.
 - d. Adopt a User Class 3 classification for any short-term, public car parking spaces and a corresponding minimum width of 2.6 metres.
 - e. Ensure a minimum length of 5.4 metres for any 90-degree angle, accessible car parking spaces.

- f. Ensure a minimum length of 5.4 metres for all other 90-degree angle parking spaces, except where it can be demonstrated that a low kerb allowing 600 mm overhang can reasonably be provided.
 - g. Provide improved separation between reversing trucks and pedestrians using the carpark.
 - h. Provide suitable access between the public and private parking areas, incorporating all necessary boom gate infrastructure, and demonstrated through swept path assessment for the B99 vehicle.
120. It is further recommended that Taswater access requirements are confirmed to ensure that the proposed level of access to the Pipeline and services Easement is sufficient, including allowance for maintenance vehicle parking bays (if required by Taswater).
121. A detailed Waste Management Plan and Loading Management Plan should be prepared, for endorsement by the relevant authority, to ensure that appropriate mitigation measures are in place to manage the risks associated with loading activity.
122. It is noted that while the above recommended changes are considered appropriate and reasonable, and if implemented will provide a satisfactory carpark design outcome, there may be an impact on the overall supply of parking that can be provided within the current carpark footprint.
123. Parking supply is another key consideration that is addressed in detail in the following section and therefore consideration should also be given to increasing the supply of car and motorcycle parking on the Site. I note that there is precedent within the local area of a development having similar size and scale providing a multi-level parking solution (30 Kangaroo Bay Drive, refer to **Section 4.3** of this statement).

7. Parking Demand

7.1. Car Parking Demand Estimates

124. For the purpose of estimating the likely car parking demand, the Project has four contributory elements:
- Hotel Accommodation
 - Restaurants
 - Commercial Tenancies
 - Function Areas.
125. I accept that the proposed wellness centre will not independently generate parking demand as it will be for the exclusive use of hotel guests.
- 126. Hotel Accommodation**
127. I agree with the rate of 1 space per 4 hotel rooms as provided in the TIA, and generally agree with the reasoning outlined in the Chambroad Representation (on p14-17). Accordingly, the hotel accommodation would generate a car parking demand of approximately 39 spaces based on 155 hotel rooms provided.
- 128. Restaurants and Commercial Tenancies**
129. For the purpose of this assessment, I have combined the restaurants and commercial tenancies because they are similar uses and the parking demand calculations are fundamentally linked.
130. I disagree with the parking demand reductions outlined in Table 13 of the TIA (on p25) as applied to the 'Hotel industry' and 'Food and beverage' components of the Project for the following reasons:
- a. There is no evidence to suggest that *'visitors to Bellerive would have 20% less car usage than other parts of Tasmania'*. Rather, the *Greater Hobart Travel Survey 2023* suggests that trip destinations within the City of Clarence have an 83.1% Private Car mode share, compared to 77.0% for the total for the Greater Hobart region².
 - b. The application of a 30% reduction due to 'combined' or multi-purpose trips is unjustified because a multi-purpose trip results in longer duration of stay. That is, there is little difference in the overall parking demand between:
 - i. Two separate people using one parking space sequentially, or
 - ii. One person using the same parking space for twice as long.

² Building Tasmania, available online at

https://www.transport.tas.gov.au/managing_the_roads/traffic_in_tasmania/greater_hobart_household_travel_survey (accessed 21 July 2026)

- c. Even if the above reductions were appropriate, they should be applied multiplicatively rather than additively. This would result in a requirement representing 56% of the rates set out in Table C2.1 of the Scheme, rather than 50%.
- d. Finally, the application of mode share adjustments, and other adjustments for various reasons, should be applied to the underlying basic demand (i.e. people on site) rather than to the car parking rates set out in Table C2.1 of the Scheme, which already incorporate some assumptions regarding building occupancy and alternative transport modes.

131. The comments in the Chambroad Representation (on p18) provide little additional information regarding the parking demand assumptions for the food and beverage uses. Rather, it implies that a 50% reduction to planning scheme rates should be considered the baseline, with evidence required to justify why this would *not* be acceptable. This is contrary to convention, and also contrary to the normal application of the Scheme.
132. The ultimate conclusion of the TIA is that the *actual car parking demand* arising from all of the commercial tenancies and restaurants on the Site is just 31 car parking spaces, implying an overflow of just 1 vehicle onto the surrounding area (Section 4.1.1 on p26).
133. This is, in my opinion, an unjustified conclusion. I have outlined the reasons in the following paragraphs.
134. The TIA (Section 4.2.1 on p37) provides total traffic generation for all users within the proposed hotel development as:
- a. Weekday AM Peak Hour 137 in / 99 out
 - b. Weekday PM Peak Hour 119 in / 125 out
 - c. Weekday Midday Peak Hour 177 in / 138 out
135. This level of traffic of up to 315 vehicle movements per hour (two-way) simply does not align with the proposed on-Site car parking supply and therefore implies that a large proportion of total car parking demand would need to be accommodated elsewhere in the network.
136. The actual expected car parking demand can be estimated from first principles based on the following formula:
- $$\text{Parking Demand} = \frac{\text{Number of non-guest patrons} \times \text{Private car mode share}}{\text{Average car occupancy}}$$
137. I estimate the total seating capacity of the four commercial tenancies and the two restaurants to be 471 people. In the absence of any other information, this is based on the seating density of the ground floor restaurant which (as indicated on the Ground Floor Plan) has a seating area of 300 m² and an indicative seating of 155.
138. This results in an average density of 1.935 m² per seat which gives the following:

Table 7-1: Assumed Seating Capacity

Component	Area	Assumed Seating Capacity
Ground Floor Restaurant	300 m ²	155
Tenancy 1 – Café / Restaurant	162 m ²	84
Tenancy 2 – Bar	143 m ²	74
Tenancy 3 – Café / Restaurant	71 m ²	37
Tenancy 4 – Café / Restaurant	66 m ²	34
Level 4 Restaurant and Bar	170 m ²	88
Total	912 m²	471

139. I note that this is generally consistent with the Transport for NSW ('**TfNSW**') publication, *Guide to Transport Impact Assessment* (2024) ('**GTIA**') which suggests typical GFA/seat to be 2.1 m² and dining floor space/seat to be 1.5 m².
140. I also note that this is likely an underestimate as it excludes the outdoor seating areas that are shown on the Ground Floor Area.
141. Whilst I acknowledge that not all cafés, restaurants and bars on the site are likely to peak simultaneously, there is no other information provided in the MPIS regarding the expected activity periods except that the proposed opening hours for all of these components are identical (6:00 am to 11:00 pm Monday to Sunday).
142. I do note that there will be times where all of these components experience relatively high levels of activity such as weekends during the early afternoon period where restaurant lunch service, café utilisation and casual dining will coincide. Accordingly, I have adopted 80% of seating capacity as the typical utilisation of these facilities during peak activity periods giving a total patronage of 377 people.
143. The facilities may be utilised by hotel guests who will not independently require parking. The following assumptions have been adopted:
 - a. 155 hotel rooms
 - b. 80% room occupancy
 - c. 1.5 guests per room
 - d. 70% of guests also dining on-site
144. The above assumptions result in 130 of the 377 café/restaurant/bar patrons being guests of the proposed hotel.
145. The '*Number of non-guest patrons*' in the calculation is therefore 247.
146. I have adopted a private car mode share of 70% for the café/restaurant/bar components of the Project. This is based on the following reasoning:

- a. The *Greater Hobart Travel Survey 2023* suggests that for City of Clarence, the private vehicle mode share for 'Social /Recreation' trip type is 69.7%.
 - b. The TIA (Table 16 on p28) adopted a mode share for private car (parked) of 70% in situations where '*attendees can travel as they please*' which is consistent with the 2023 survey findings.
- 147. The '*Private car mode share*' in the calculation is therefore 0.7.
- 148. I have adopted an average car occupancy of 2.2 people per vehicle. This is consistent with traffic engineering 'rule of thumb' for this type of land use and is identified in the GTIA as being appropriate for restaurant type uses.
- 149. It is also consistent with the results of the *Greater Hobart Travel Survey 2023* which indicates 48.0% 'vehicle driver' compared to 21.7% 'vehicle passenger' for 'Social Recreation' trips within City of Clarence representing a ratio of 2.21 people per vehicle.
- 150. The '*Average car occupancy*' in the calculation is therefore 2.2.
- 151. Based on the above assumptions, the peak car parking demand arising from the café, restaurant and bar components of the Project is calculated as around 79 vehicles as a result of 247 external patrons using these facilities at a given time.
- 152. This level of parking demand is likely to be experienced during the morning periods (when café uses are at their peak), during the weekend afternoon periods (when most uses are generating high activity), and during the evening periods when restaurants are fully utilised.
- 153. **Function Areas**
- 154. The Project includes one 263 m² function space as well as two 220 m² function spaces that can be combined into one 440 m² function space. The TIA (Section 4.12 on p27) provides a schedule of events that might be held at the site. I agree that this schedule is a reasonable basis on which to estimate car parking demand associated with function areas.
- 155. I generally agree with the parking demand expectations outlined in Table 16 of the TIA (on p28) with the following exceptions:
 - a. For a 150-person convention event during the weekday daytime, the TIA estimates a parking demand of 20 spaces based on 20% mode share to car (parked). It appears that this mode share has been calculated as being constrained by the available on-site car parking supply. However, this is not a realistic estimate of actual parking demand, rather it simply articulates how much parking can be accommodated on site. It is far more likely that patrons will still attempt to drive and park in the surrounding area, competing with other uses for parking at Kangaroo Bay Drive, Bellerive Yacht Club, Percy Street carpark and other public parking areas.
 - b. The same approach has been taken for a 170-person event held on a Saturday morning. It is likely that attendees will still drive and park in the area, and compete for space with other uses.
 - c. I see no reason why a 70% private car mode share should not also apply to these events, with the overflow parking demand occupying parking spaces in the immediate surrounding area, and possibly beyond.
 - d. That is, the limited on-site parking supply will not necessarily deter function attendees from driving and parking, rather this parking activity will simply occur increasingly distant from the site (up to a 10-15 minute walk in some instances).

156. Accordingly, my parking demand estimates for the function spaces is provided in Table 7-2.

Table 7-2: Function Areas Car Parking Demand

Period	Attendees	Drive and Park Mode Share	Car Occupancy	Car Parking Demand
Weekday daytime	35 people	80%	1.5	42 spaces
	150 people	70%	1.5	70 spaces
Weekday evening	150 people	70%	2.0	53 spaces
Saturday morning	170 people	70%	2.0	60 spaces
Saturday afternoon, Sunday	170 people	70%	2.0	60 spaces
Friday/Saturday evening	350 people	70%	2.0	123 spaces

7.2. Summary Car Parking Demand, Supply and Overflow

157. A summary of the total estimated car parking demand generated by the Project is provided in Table 7-3.

Table 7-3: Summary of Car Parking Demand

Project Component	Assessment Period		
	Weekday Daytime	Saturday/Sunday Daytime	Friday/Saturday Evening
Hotel Accommodation	39 spaces	39 spaces	39 spaces
Restaurants and Commercial Tenancies	79 spaces	79 spaces	79 spaces
Function Spaces	70 spaces	60 spaces	123 spaces
Total	188 spaces	178 spaces	241 spaces

158. In considering the reasonableness of the above estimates, I have reviewed the proposed uses against the rates provided in Table C2.1 of the Scheme.

Table 7-4: Table C2.1 Car Parking Requirements

Component	Measure	Land Use	Table C2.1 Rate	Car Parking Requirement
Hotel	155 rooms			
Level 4 Restaurant and Bar	170 m ²	Visitor Accommodation	1 space per room or 1 space per 4 beds, whichever is the greater	155 spaces
Wellness Centre	145 m ²			
Ground Floor Restaurant	375 m ²	Restaurant	1 space per 15m ²	25 spaces
Tenancy 1 – Café / Restaurant	162 m ²			
Tenancy 3 – Café / Restaurant	71 m ²	Food Services (Other)	15 for each 100m ²	45 spaces
Tenancy 4 – Café / Restaurant	66 m ²			
Tenancy 2 – Bar	143 m ²	Hotel Industry	1 space per 20m ²	8 spaces
Function Centre	703 m ²	Community Meeting & Entertainment	1 space per 15m ²	47 spaces
Total				233 spaces

159. Based on Table 7-4, the expected car parking demand of 178-188 spaces (excluding major evening events) represents a discount of around 20-25% compared to the Table C2.1 rates and is generally considered reasonable. Note that this assumes that the Level 4 restaurant and bar fall under the Visitor Accommodation land use and do not independently require parking in accordance with Table C2.1.
160. The proposed car parking supply on the Site comprises 30 publicly accessible car parking spaces, and 61 private car parking spaces located behind a boom gate, for a total of 91 spaces.
161. The expected overflow of parking from the Site is therefore expected to be as follows:
 - a. 49 vehicles associated with the restaurants and commercial tenancies, and

- b. Between 38 and 101 vehicles associated with the function spaces (depending on events).

7.3. Capacity of the Surrounding Area

- 162. If the Project is approved with the current development and car parking supply, then the surrounding area will be required to absorb additional parking demand of between 87 and 97 vehicles (typically) and potentially up to 150 vehicles under the most intense event scenario identified.
- 163. The TIA identifies the following public parking facilities in the surrounding area (Table 8 on p14):
 - a. Kangaroo Bay Drive – On-street Parking (74 spaces)
 - b. Overflow car park on Pembroke Place (~90 spaces)
 - c. Waterfront Hotel Car park (43 spaces)
 - d. Kangaroo Bay Boardwalk off Cambridge Road (32 spaces)
 - e. 2 Percy Street (Carpark A) (96 spaces)
 - f. 3-5 Percy Street (Carpark B) (51 spaces)
- 164. It is noted that the Overflow carpark on Pembroke Place is not available long-term as it is subject to an approved permit (refer **Section 4.3** of this statement). This is also acknowledged in the Chambroad Representation (p19). Any existing parking demand currently being accommodated at this carpark would eventually be loaded back onto the remaining parking facilities.
- 165. The TIA relies on a series of spot car parking surveys undertaken on Tuesday 26 August 2026 (9:00 am, 12:00 pm and 4:00 pm) and on Sunday 26 October 2025 (12:30 pm and 6:30 pm). Table 8 of the TIA provides only four sets of results, and it is unclear at what time the “weekday daytime” survey result refers to.
- 166. I further note that the peak parking demand period within the Kangaroo Bay precinct (Saturday) has not been surveyed.
- 167. Based on the surveys provided in the TIA, the spare public car parking capacity within the local area is summarised below.

Table 7-5: Car Parking Occupancy

Location	Supply	Number of Occupied Spaces			
		Weekday Daytime	Weekday Evening	Sunday Daytime	Sunday Evening
Kangaroo Bay Drive	74	60	31	40	8
Pembroke Place Carpark	0 ³	54	4	1	1
Waterfront Hotel Carpark	43	42	21	43	15
Kangaroo Bay Boardwalk	32	32	21	21	17
2 Percy Street (Carpark A)	96	-	-	24	19
3-5 Percy Street (Carpark B)	51	-	-	19	8
Total	296	-	-	148	68
Demonstrated Spare Parking Capacity		-(39)	72	148	228

Source: TIA

168. It is acknowledged that parking demand in the area varies significantly during the week, with different parking activity patterns on weekdays, Saturdays and Sundays. Each of the peak demand periods is discussed in the following sections.

Weekday Daytime

169. With reference to Table 7-3 above, the expected car parking demand on a typical weekday is around 188 vehicles. Assuming a supply of 91 car parking spaces on the Site, the overflow would result in up to 97 vehicles parking within the surrounding area.
170. With reference to Table 7-5 above, the existing parking facilities are over-capacity on weekdays. This is due to existing parking activity that is currently occurring at the 'Pembroke Place Overflow Carpark' that would be put back onto the surrounding area when this land is developed (which could occur at any time). It is also noted that while the Percy Street carparks were not surveyed, a brief review of aerial photography indicates that these are heavily utilised on weekdays and there is effectively no spare capacity in these facilities.
171. Accordingly, based on the information provided in the TIA, the spare capacity of the surrounding area to accommodate overflow parking demand from the Site is effectively zero on weekdays.
172. If approved, there would be increased competition for limited parking resources in the area between people accessing the Site and existing shopping, recreation and commercial facilities. Parking demand will spill out into surrounding residential areas. It will become

³ Reflects the future public parking supply once development on this site is commenced

significantly more difficult for drivers to find an appropriate parking space, ultimately increasing traffic volumes due to searching.

173. The TIA has not demonstrated that the proposed parking supply of 91 spaces is sufficient to meet the reasonable needs of the Project on weekdays. More detailed parking surveys are required in order to confirm the actual availability of public car parking spaces in the area, given the Project largely relies on public parking.

Saturday Daytime

174. The TIA did not provide Saturday surveys.
175. Section 5.2 (on p63) of the TIA states that *“There are substantial amounts of parking available in Bellerive. Whilst full during weekdays and Saturday mornings, outside these times many spaces are empty. There is opportunity to utilise these spaces where required for the function centre during these less busy periods.”*
176. I have undertaken a brief review of aerial photography based on four photographs taken on Saturdays between 2020 and 2026. My observations are that there is very little spare capacity within the area on any given Saturday. This includes parking facilities along Kangaroo Bay Drive, the overflow carpark (to be developed) and public carparks on Percy Street.
177. In addition, the Bellerive Yacht Club and Marina carpark is typically fully utilised on a Saturday, and parking overflows onto the Site along either side of the existing driveway connection to Kangaroo Bay Drive.
178. On the basis of the above observations, and noting a potential overflow of up to 87 vehicles from the Site, the TIA has not demonstrated that the proposed parking supply of 91 spaces is sufficient to meet the reasonable needs of the Project on Saturdays. More detailed parking surveys are required in order to confirm the actual availability of public car parking spaces in the area, given the Project largely relies on public parking.

Sunday Daytime

179. I am satisfied that parking demands on a typical Sunday can be accommodated.

Friday / Saturday Evenings

180. With reference to Table 7-3 above, the expected car parking demand for a typical Friday or Saturday evening (with a 350-person event) is around 241 vehicles. Assuming a supply of 91 car parking spaces on the Site, the overflow would result in up to 150 vehicles parking within the surrounding area.
181. With reference to Table 7-5 above, there is at least 72 parking spaces available on weekday evenings and likely similar on a Saturday. While the Percy Street carparks were not counted, I accept that parking occupancy is likely similar to the Sunday daytime occupancy which would imply a further 104 public spaces available.
182. On this basis, I am satisfied that parking demands for a Friday or Saturday evening can be accommodated.

7.4. Bicycle Parking

183. I support the provision of 28 bicycle parking spaces on then site at the locations indicated in the Chambroad Representation (on Vigilus Dwg No. A.02 – Ground, Rev Q dated 29/06/2026).

7.5. Motorcycle Parking

184. The Project would provide three dedicated motorcycle parking spaces.
185. The normal requirements for motorcycle parking are set out in Table C2.4 the Scheme as 1 motorcycle parking space per every 20 car parking spaces required (after the first 20).
186. It is noted that Clause C2.2.2 of the Scheme exempts *Visitor Accommodation* from providing motorcycle parking.
187. Given that the car parking requirement for other uses sums to 125 car parking spaces (refer Table 7-4 above) the Project would ordinarily require seven motorcycle parking spaces to be provided.
188. In my opinion, at least seven motorcycle parking spaces should be provided. This is based on the following:
- a. There is a substantial undersupply of car parking on the site, and provision of more motorcycle parking would partially offset this deficiency.
 - b. There are 22,430 registered motorcycles in Tasmania⁴ compared to a total of 476,211 registered light vehicles (including cars, station wagons, utilities and vans) representing a ratio of around 1:22 (or 4.8%).
 - c. To my knowledge, there is no public, dedicated motorcycle parking within the Kangaroo Bay precinct currently.
 - d. It would be an inefficient use of space for motorcycles to occupy car parking spaces.

7.6. Summary and Recommendations

189. Based on the parking demand and supply review provided in **Sections 7.1 to 7.5** it is my view that the Project would place considerable strain on existing public parking resources on weekday and Saturday daytime periods with up to 97 additional vehicles requiring parking in the immediate surrounding area and no spare capacity.
190. Indeed, the existing parking demand already appears to significantly exceed the available supply given the current use and utilisation of the overflow facility on Pembroke Place that could be removed at any time.
191. It is recommended that options for increasing the on-site car parking supply should be explored including, if necessary, provision of a multi-level carpark. I note that there is precedent of an approved development of a similar size and scale in the local area providing a multi-level carpark (Permit No. PDPLANPMTD-2020/011070 at 30 Kangaroo Bay Drive).

⁴ Building Tasmania, Registration & Licensing Statistics (available https://www.transport.tas.gov.au/licensing/general_information/statistics, dated 02 June 2026, accessed 24 June 2026)

192. If the Project is approved, a cash contribution towards Council may be also warranted, to be calculated based on the ultimate car parking deficiency, to assist Council to develop additional public parking facilities in the local area so that parking demands can be accommodated.

8. Foreshore Trail

8.1. Existing Conditions

193. The Clarence Foreshore Trail is a 14.5 km multi-user pathway following the shores of the Derwent River between Geilston Bay and Howrah. A map of the trail is provided in Figure 8-1.

Figure 8-1: Clarence Foreshore Trail



Source: Clarence City Council, Popular Trails in Clarence, 2024

194. It also integrates with the Charles Darwin Trail which is a 12 km walking trail around Bellerive and Howrah and also passing through the Site (Figure 8-2).

Figure 8-2: Charles Darwin Trail



Source: Clarence City Council, Popular Trails in Clarence, 2024

195. The Site forms a critical link in the Clarence Tracks and Trails network, which is reflected in the schedule of easements on the existing title.
196. As discussed in **Section 4.1** of this statement (and shown on Figure 4-3) there are two Right of Way easements on the Site (labelled Right of Way “C” and Right of Way “E”) which are subject to Right of Access in favour of Council and for the specific purpose of Council’s shared use trails and trails and pedestrian walkways networks.
197. The existing trail through the Site is indicated in Figure 8-3. It connects to the shared user path running along the Kangaroo Foreshore to the north, and links into the existing Bellerive Yacht Club and Marina carpark with connection to the boardwalk along the Marina further south.

Figure 8-3: Existing Trail



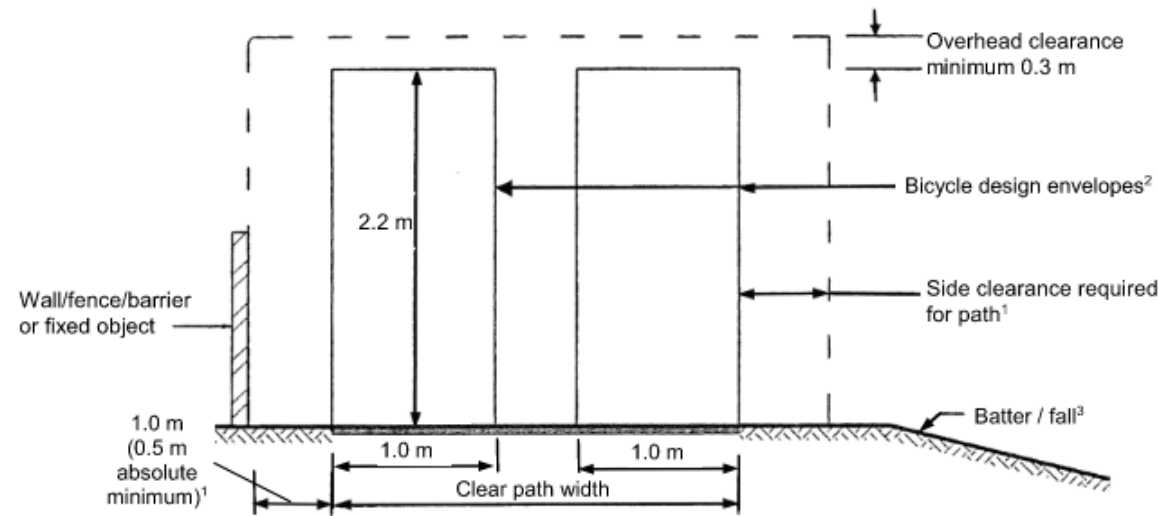
Source: Nearmap Imagery (dated 25/04/2026)

8.2. Relevant Design Guidelines

198. The relevant design guidelines are provided in *Tasmanian Cycling Infrastructure Design – Tasmanian Walk, Wheel, Ride Guidance*, published by the Department of State Growth in February 2025 (**'Design Guide'**).
199. Section 4.3.8 of the Design Guide deals specifically with off-road shared user paths. It provides a preferred width of 4 metres (or more), with an absolute minimum width of 2.5 metres applicable to short sections of path only.
200. The Design Guide refers to the Austroads publication, *Guide to Road Design – Part 6A: Paths for Walking and Cycling* (**'Austroads Part 6A'**) for further guidance.
201. Table 5.3 of Austroads Part 6A suggests that for a recreational shared user path, the desirable minimum width is 3.5 metres. However, it does suggest that higher widths should be considered where the number of cyclists and pedestrians are very high, or where there is a high probability of conflict between users.
202. Section 5.5 of Austroads Part 6A provides guidance on clearance between the cyclist envelope and potential path hazards. This is illustrated in Figure 5.7 of Austroads Part 6A and replicated below in Figure 8-4.

Figure 8-4: Clearance Requirements to Potential Hazards

Figure 5.7: Clearances between cyclist envelope and potential path hazards



Source: Austroads, Guide to Road Design – Part 6A: Paths for Walking and Cycling (2021)

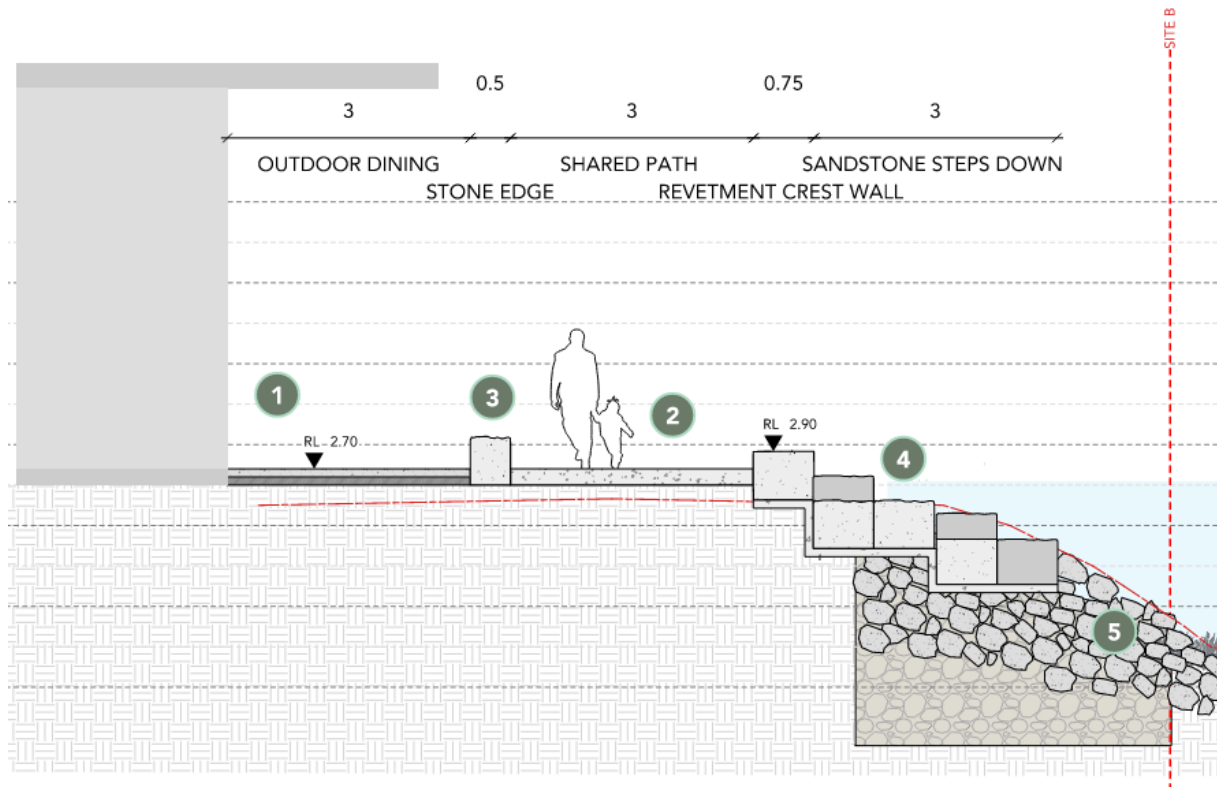
203. Section 5.5.2 of Austroads Part 6A notes that a minimum lateral clearance of 1.0 metres is required between opposing bicycle operating spaces for speeds of over 20 km/h. For speeds less than 20 km/h, this could be reduced to 0.5 metres. It further notes that a centre-line may be required where clearances are minimum, to provide guidance and certainty to opposing cyclists.
204. Based on the above review, it is recommended that the proposed Foreshore Trail adopt the following minimum requirements:
- | | |
|---------------------------------------|------------------|
| a. Two cycling envelopes | 2x 1.0 m |
| b. Clearance between cyclists | 0.5 m |
| c. Clearance to fencing/fixed objects | 0.5 m both sides |
| d. Total minimum width | 4.0 m |

8.3. Review of Proposal

205. The Project includes an extension of the Clarence Foreshore Trail through the Site along the western edge of the development. It is understood that it would comprise a 3.0 metre wide exposed aggregate, concrete path with stone edging to separate it from the adjacent outdoor dining area. An additional boardwalk with seating, viewing platform and other public spaces would be provided on the water side of the path⁵.
206. A review of the Landscape Section Details provided with the MPIS shows that separators either side of the shared user path may constitute a vertical obstruction requiring clearance as set out in Austroads Part 6A. These separators would need to be tall enough to prevent from being a tripping hazard, and would therefore be in an area that may be clipped by pedals and/or handlebars. The stone edges would be rough.
207. Refer to Figure 8-5 below.

⁵ Realm Studios, Dwg No. 23651-00-L100, GF_Concept Plan

Figure 8-5: Shared Path with Vertical Obstructions Either Side



Source: Realm Studios, Section 6.3 Section Details – Ground Floor, Section 1

208. The proposed shared path width should be increased to 4.0 metres, in line with the minimum width design standards provided in Paragraph 204 above. This will provide sufficient clearance for cyclists to safely pass each other, or for a cyclist to pass a pedestrian or a group of pedestrians, without undue risk of conflict with obstructions either side. A width of 4.0 metres is also consistent with the width of Right of Way “C” as recorded on the title.
209. The shared user path has an estimated radius of around 15 metres around the bend. This is suitable for speeds up to 20 km/h without requiring superelevation, however consideration should be given to widening the path around the bend to account for cyclists leaning into the corner.
210. The Project would redirect the existing trail from its current alignment, around the western edge of the Site. The relocated shared user path would integrate with the existing shared user path along Kangaroo Bay to the north, and the proposed boardwalk path that would be constructed as part of the approved development at the Bellerive Yacht Club and Marina carpark to the south.
211. This arrangement is supported as it is consistent with the clear intent for the Site as shown on the schedule of easements on Registered Plan 173171 (and specifically, Right of Way “C”), however it does not negate the need to provide safe cycling through the site along Right of Way “E”.
212. The driveway through the carpark forms a direct and logical extension of Kangaroo Bay, with connection to the Bellerive Yacht Club and Marina carpark, throughout which the shared user path can be accessed to the south. This route is an attractive one for cyclists, compared to utilising the foreshore trail around the development, particularly due to the shorter travel distance, more direct alignment and reduced obstruction from pedestrians.

213. It is highly likely that many cyclists would prefer to ride down Kangaroo Bay Drive, enter and ride through the carpark, and continue through the Bellerive Yacht Club and Marina rather than navigating the intended path.
214. It is therefore necessary to provide a safe environment for cycling through the proposed carpark. This is consistent with the Right of Carriageway and Right of Access over Right of Way “E” recorded on the title.
215. As discussed in **Section 6** of this statement, the current carpark design does not provide a safe cycling environment due to the constrained width, mixing of traffic streams (including boat trailers and heavy vehicles) and 90-degree angle parking.

8.4. Recommendations

216. Based on the findings of this review, I make the following recommendations:
- a. The proposed shared path to be a minimum of 4.0 metres in width between vertical obstructions either side.
 - b. Further path widening to be considered around the bend due to the proposed 15-metre radius.
 - c. Improvements to the carpark design and layout to support safe cycling through the Site.

9. Assessment Against Criteria

9.1. Criterion 2.1 – Car Parking and Access

Car parking and access is:

- (a) provided to meet the needs of the proposed uses, including adequate access for goods delivery and collection;*
- (b) designed and constructed to be convenient, safe, and efficient, including associated areas for access, manoeuvring and circulation;*
- (c) designed and sited to not have a significant adverse impact on the streetscape; and*
- (d) designed to achieve public vehicular access and connectivity between the Marina and Kangaroo Bay Drive, within the project site;*

to an acceptable level.

Initial Assessment Report

217. Under Assessment Criterion 2.1, the Panel specifically noted four outstanding issues, which I have responded to in the following paragraphs.

“The development plans in Volume 2 show the general arrangement for parking spaces, but do not clearly specify which individual spaces are assigned to specific types of parking (i.e. DDA accessible, motorcycle, public parking, private parking, valet parking).”

218. The Chambroad Representation includes a colour-coded plan showing car parking allocation on the site. It is clear based on this plan which spaces are allocated to which particular purpose.

“There are differences in the proposed layout of parking spaces between various plans and reports.”

219. I note that these discrepancies have not been resolved. There remain differences between the architectural drawings, infrastructure drawings and landscape drawings. Notwithstanding, this statement of evidence recommends that a significant redesign of the carpark is required in order to resolve other major layout issues.

“Bicycle parking is not clearly proposed on the use and development plans in Volume 2, although bicycle parking is recommended in the Traffic Impact Assessment, with possible locations identified.”

220. The Chambroad Representation includes an amended ground floor plan which shows the proposed supply and location of bicycle parking spaces. I agree with the provision of 28 bicycle parking spaces and the proposed locations appear to be reasonable in my opinion.

“The proponent’s views on the adequacy of parking for the anticipated requirements for each use type, and anticipated choices of transport mode of users of the Project, are in

part based on statements of opinion, from a source with a direct commercial interest in the Project, with no detail of evidence to support those opinions.”

221. The Chambroad Representation provides additional information to support a reduced parking requirement for the *Visitor Accommodation* land use of 1 space per 4 rooms. I agree with the reasoning provided and the conclusion.
222. I also agree that the proposed Wellness Centre will not independently generate parking.
223. The TIA provides a number of assumptions with respect to the parking demand generated by function spaces which I mostly agree with, subject to a few amendments as outlined in **Section 7.1** of this statement.
224. However, the information provided with respect to the Food and Beverage uses remains deficient. There is no evidence provided within either the TIA or the Chambroad Representation to support the car parking reductions applied. In fact, it appears to adopt that a 50% reduction should be considered baseline with evidence required to demonstrate that this is not a suitable assumption (on p18).
225. On its face, it should be quite obvious that two restaurants and four individual tenancies, with a combined capacity for up to 471 people, will generate additional parking demand beyond the 30 publicly accessible car parking spaces provided on the Site and that some reliance on parking in the surrounding area is required.
226. I have provided my own car parking demand estimates in **Section 7.1** of this statement and conclude that the car parking demand arising from the Project is likely to be in the range of 178 to 241 spaces depending on events.
227. I have also considered the ‘reasonableness’ of this demand by comparing it to the normal requirements of Table C2.1 and judge it to represent a discount of around 20-25% during normal conditions (i.e. excluding major evening events).

City of Clarence Representation

228. The City of Clarence Representation raises a number of issues relevant to traffic and parking, which I have responded to in the following paragraphs:
- “The number of car parking bays and motorcycle bays described in Table 11 of the Attachment 20 - Traffic Impact Assessment (TIA) (and therefore repeated in other documents) do not match that shown on the Finalised Architectural plans (Appendix A of that report). In addition, the TIA shows two other parking layouts (pages 21 and 31) respectively – the latter being repeated on page 25 on the Traffic and Movement Study. Accordingly, it is unclear what the actual proposed parking arrangements and numbers are.” (p6)*
229. There are a number of discrepancies which remain between the architectural drawings, the infrastructure drawings and landscape plans. I have prepared this statement on the basis that 91 car parking spaces are provided, however I note that a key recommendation of this statement is that a carpark redesign is required in order to resolve major layout issues (refer **Section 6.7**). A further recommendation of this report is that the supply of parking on the site be increased as there is insufficient parking available in the surrounding area to accommodate overflow demand on weekdays and Saturdays (refer **Sections 7.3** and **7.6**).
- “The TIA identifies the vacant site at 30 Kangaroo Bay Drive as “Overflow parking” and makes the assumption that this area is available for public use into the future. That assumption is erroneous.” (p6)*

230. The Chambroad Representation (on p19) states that *'The survey of the Pembroke Place car park was included as an assessment of existing conditions. As a whole, the use of this car park is not necessary to the operation of the Kangaroo Bay Hotel.'*
231. This conclusion is based on car parking demand estimates that are unrealistic.
232. Furthermore, while the response suggests that the survey was considered in the existing conditions assessment, it fails to consider that existing parking demand currently being served by this overflow carpark will, at some point, be loaded back onto the surrounding area when this land is developed.
233. That is, while this supply of parking may at some point be removed, the parking demand that it currently accommodates will not.
234. This has significant implications for the availability of public parking in the area in the future, particularly on weekdays and Saturdays.

"The TIA has, in part, justified a reduced provision of parking for the Major Project by suggesting that analysis of other similar development indicates that a one car space per four residential tenancies is a more appropriate rate, as well as applying a reduced parking allowance due to the presence of public transport and multi-modal opportunities for transport.

Whilst the principles for variations to the planning scheme parking requirements outlined is generally agreed, the numerical assumptions used to justify a reduction in parking provision to 50% of the scheme rate are not sufficiently substantiated, nor should the 30% and 20% be simply added to make 50%. The lack of evidence-based justification and the compounding of non-independent assumptions means the car parking demand reduction is likely to be overstated. Especially considering with a predominance of tourists to Hobart using cars as their main transport mode." (p6-7)

235. Whilst I generally agree with the use of one space per room for the *Visitor Accommodation* use, the information provided within the TIA and the Chambroad Representation does not adequately justify the parking demand assumptions applied to the Food and Beverage components of the Project.
236. I have addressed this at length in this statement (refer to **Section 7**) and provide a more realistic car parking demand estimate.

"It is our position that the proposal has not provided sufficient parking on site and/or demonstrated that sufficient carparking is readily available nearby to accommodate the reasonable use of the site." (p7)

237. I agree with Council's position in this regard. As discussed in **Section 7** of this statement, it is clear that the parking demand reduction assumptions applied in the TIA are not warranted and have not been justified.
238. The likely actual parking demand arising from the Project is between 178 and 241 parking spaces (depending on events being held) against a parking supply of 91 spaces.
239. The surrounding road network does not have demonstrated capacity to accommodate up to 87-97 vehicles of overflow demand from the Site on weekdays and Saturdays.

"The site plan does not align the access to the Bellerive Yacht Club with the Right of Carriageway "E" on Lot 11 and appears to shift it to the west and locates carparking, loading areas and overhead supporting structures within this area which will fundamentally interfere with Right of Carriageway." (p4)

240. This is acknowledged and has been discussed in **Section 6.4** of this statement. I further note that the relocation of the proposed access may not be compatible with approved carpark development works at the Bellerive Yacht Club and Marina and will impose height restrictions on the use of the Right of Way.
241. The proposed driveway is insufficient in width, does not provide for safe cycling access, may be obstructed by parked cars overhanging the aisle due to deficiencies in the design, and will be subject to reversing movements (including cars and trucks).
242. In this statement, I have recommended that a substantial redesign of the proposed carpark is required in order to resolve major layout issues.

Other Issues Raised

243. In addition to the issues raised in Council's Representation, I have identified a number of other issues that are relevant to the assessment against Criterion 2.1. These are discussed in significant detail in **Sections 6** and **7** of this report and are summarised as follows:
- a. The dimensions of the carpark are deficient and do not comply with the relevant Australian Standards including the length of regular spaces, the suitability of vehicle overhanging the raingarden, and the length of accessible parking spaces.
 - b. The publicly accessible portion of the carpark does not provide on-site turning such that parallel parking spaces and the parallel loading zone cannot be accessed without reliance on neighbouring land over which the Site has no right of carriageway. These movements introduce U-turns to the Bellerive Yacht Club and Marina carpark.
 - c. The proposed loading bay access arrangements introduce multiple points of conflict with pedestrians, vehicles and cyclists which are not sufficiently managed.
 - d. Access between the two car parking areas appears to be insufficient for the relevant design vehicle (B99 vehicle) given the requirement to house boom gate infrastructure within a central median.
 - e. Additional motorcycle parking should be provided on the Site.

Summary of Assessment

244. Each limb of the test under Criterion 2.1 Car Parking and Access is addressed in the following paragraphs:
- (a) Car parking and access is provided to meet the needs of the proposed uses, including adequate access for goods delivery and collection to an acceptable level.*
245. The MPIS has failed to demonstrate that there is sufficient car parking to meet the reasonable needs of the proposed uses. The expected car parking demand is between 178 and 241 parking spaces (depending on events held) and would result in an overflow of around 87 to 97 vehicles on weekdays and Saturdays typically.
246. There is effectively no spare capacity of public parking facilities within a reasonable walking distance of the Site. Furthermore, existing parking demand that is currently accommodated at the 'Pembroke Place overflow carpark' will eventually be distributed to other parking facilities when this land is developed, further increasing strain on the public parking supply.
247. Access to parallel on-site car parking spaces (and the parallel loading bay) is unacceptable because it relies on neighbouring land over which the Site has no right of carriageway.

248. The proposed access to the loading bay introduces several conflicts to the carpark and accessway which are not appropriately mitigated. The expected frequency of access, combined with these inherent risks in the carpark, warrant a more substantial impact mitigation plan in order to maintain a safe environment for all road users.
249. In my opinion, the Project does not provide sufficient car parking and access to meet the needs of the proposed uses.
250. If the Project is approved in its current form, it is recommended that conditions be placed on the development including:
- a. Preparation of a detailed Waste Management Plan and Loading Management Plan for endorsement by the relevant authority.
 - b. A cash contribution towards Council to be calculated based on the ultimate car parking deficiency, to assist Council to develop additional public parking facilities in the local area.
- (b) Car parking and access is designed and constructed to be convenient, safe, and efficient, including associated areas for access, manoeuvring and circulation to an acceptable level.*
251. In my opinion, the carpark as designed is not convenient, safe or efficient. There are numerous deficiencies in the current layout with respect to the relevant Australian Standards and having regard to the intended use of the accessway including providing access to the Bellerive Yacht Club and Marina.
252. This statement has recommended that the carpark be substantially redesigned in order to resolve major layout issues. The key design issues and recommendations are provided in **Section 6.7** of this report.
- (c) Car parking and access is designed and sited to not have a significant adverse impact on the streetscape to an acceptable level.*
253. I have not addressed this limb of the test as streetscape and urban design are not within my specific area of expertise.
- (d) Car parking and access is designed to achieve public vehicular access and connectivity between the Marina and Kangaroo Bay Drive, within the project site to an acceptable level.*
254. While vehicular access is provided, in my opinion it is not provided to an acceptable level.
255. The proposed design of the carpark presents several conflicts, obstructions and deficiencies with respect to access to the Marina including potential overhang of parked vehicles into the aisle, insufficient Right of Way width, regular obstruction due to reversing vehicles (including heavy vehicles), conflict between parked/parking vehicles and boat trailers, trucks and other service and maintenance vehicles.
256. The carpark also presents an unsafe environment for cycling through the site.

9.2. Criterion 2.2 Traffic and Transport

The proposed use and development:

- (a) generates traffic that avoids or minimises significant adverse effects on the safety and efficiency of the road network nearby the project site; and*

(b) encourages the use of alternative modes of transport to access the project site by the public, guests and employees.

to an acceptable level.

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257. The Panel considered that the information provided in the MPIS addressed all aspects of the assessment criterion for traffic and transport. However, some inconsistencies were noted between the TIA and the TMS in Volume 3 of the MPIS.
258. I generally agree that the information provided in the MPIS is sufficient to address Criterion 2.2.

City of Clarence Representation

259. The City of Clarence Representation raises issues relevant to traffic and transport, which I have responded to in the following paragraphs:
- “SIDRA modelling indicates that queues on the east approach to the Rosny Hill Road/ Bligh Street/ Kangaroo Bay Drive intersection extend through the Rosny Hill / Cambridge Road roundabout. However, the impacts of this queueing within and through the roundabout have not been acknowledged or assessed.” (p17)*
260. Section 2.6.5 of the TIA (on p11) estimates a 95th percentile queue of up to 266.5 metres at the east approach to this intersection during the morning peak period under current conditions.
261. Section 4.2.3 (on p38) estimates that the 95th percentile queue length would increase to around 305.7 metres immediately post-development.
262. In context, this is a relatively minor increase in queuing. I note that there appears to be spare capacity within the intersection generally and that it may be feasible to adjust cycling timing to provide greater priority to the east approach if this is considered to be necessary.
263. I generally agree with the response provided in the Chambroad Representation (on p20) that:
- Only a relatively small proportion of overall traffic to/from the Site would be contributing to this movement;
 - The queue described above is an existing issue, that will only be slightly exacerbated due to the Project; and
 - The issue is limited to the weekday morning peak period.
264. Further, I note that a large proportion of the queue would be vehicles approaching the roundabout from Cambridge Road to the south. These vehicles are required to give way to traffic approaching from the north and therefore the probability that the roundabout will experience full blockage is minor.

Summary of Assessment

265. Each limb of the test under Criterion 2.2 Traffic and Transport is addressed in the following paragraphs:
- (a) The proposed use and development generates traffic that avoids or minimises significant adverse effects on the safety and efficiency of the road network nearby the project site to an acceptable level.*

266. In my opinion, this is met.

(b) The proposed use and development encourages the use of alternative modes of transport to access the project site by the public, guests and employees to an acceptable level.

267. In my opinion, this is met.

9.3. Criterion 1.4 – Public Domain and Passive Surveillance

“The siting and design of the proposed development creates publicly accessible spaces and improves the passive surveillance of the project site and surrounding area, by:

- (a) providing a publicly accessible space through the western or central part of the project site;*
- (b) maintaining an actual and legible network of publicly accessible pathways (pedestrian and cycle) between the Village and Kangaroo Bay Drive; and*
- (c) avoiding the creation of concealment and entrapment spaces;*

to an acceptable level.”

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268. The Panel considered that the information provided in the MPIS addressed all aspects of the assessment criterion for traffic and transport.

City of Clarence Representation

269. The City of Clarence Representation raises the following issues relevant to the public domain, which I have responded to in the following paragraphs:

“The design is currently showing a 3.0m wide shared use path which is a continuation of the existing CFT width and format (see snip 1 below). The design has both sides of the shared path bound by low walls or sandstone blockwork, essentially containing CFT users to the path. These edges are a pedal clipping hazard for cyclists and to avoid they will travel more central on the path. Best practice we now apply to any new works on the CFT is provide at least a 500mm offset for any raised edges or obstructions on edges of the trail. While existing sections of the CFT are 3.0m, we would recommend if the current cross section design is to be retained, the shared path should be at least 4m wide.” (p13)

270. I agree with this recommendation for the reasons outlined in **Section 8** of this statement. Specifically, the stone separators either side of the shared use path will constitute either a tripping hazard for pedestrians or a snagging hazard for cyclists. Accordingly, a minimum width of 4.0 metres should be provided for the proposed shared user path.

“There are several points where cross-movement will occur across the CFT, especially from the hotel to the lookout point and viewing decks. Every cross movement is a risk for collision with cyclists, exacerbated by the edge containment reducing opportunity to avoid by moving off the path or tracking close to the edge. The curve of the path, especially around the south side as well as proposed planting areas (screening shrubs) will likely shorten sight lines. The design currently relies on users managing their own risk – cyclists slowing and pedestrians being aware of their surroundings. This is unlikely to eliminate conflict, especially during peak use times.” (p13)

271. The above concern is noted. This report recommends that consideration be given to widening the pathway around the 15-metre radius bend in order to provide additional clearance for cyclists leaning into the corner, but this change will also improve sight lines and improve passing opportunities.
272. I also agree that the potential for cross-movements across the Clarence Foreshore Trail will obstruct cyclist movement and constitutes a collision risk. Accordingly, the direct path through the carpark via the main access driveway would be an attractive route for cyclists to take as it avoids potential interaction with pedestrians.

“Given the current layout, it is predicted confident cyclists will avoid the CFT on the foreshore and will instead divert to on-road passage behind the Hotel and through the rear car park (see snip 2 below). This cycle movement is currently not accommodated and introduces a new range of possible conflicts between cars, pedestrians and loading bays.”

273. I agree with this statement. The obstruction caused by pedestrian use of the Clarence Foreshore Trail (including cross-movements) will deter cyclists from using this route. The directness of the carpark access, providing a straight line extension from Kangaroo Bay Drive to the Marina, would similarly attract cyclists to that route instead of the proposed shared user path.
274. The proposed carpark, as designed, does not provide a safe environment for cycling due to 90-degree angle parking accessed directly from the accessway and the resulting reversing vehicle movements. The footpath is unsuitable for cycling due to the presence of pedestrians and door opening from parallel parked cars.

Summary of Assessment

275. Each limb of the test under Criterion 1.4 Public Domain and Passive Surveillance is addressed in the following paragraphs:
- (a) The siting and design of the proposed development creates publicly accessible spaces and improves the passive surveillance of the project site and surrounding area, by providing a publicly accessible space through the western or central part of the project site to an acceptable level.*
- (b) The siting and design of the proposed development creates publicly accessible spaces and improves the passive surveillance of the project site and surrounding area, by maintaining an actual and legible network of publicly accessible pathways (pedestrian and cycle) between the Village and Kangaroo Bay Drive to an acceptable level.*
276. The proposed width of the shared user path is 3.0 metres. In my opinion, this is deficient and should be widened to provide a minimum width of 4.0 metres between vertical obstructions either side in order to provide an acceptable outcome for cyclists.
277. For the reasons outlined in Paragraphs 273 and 274 above, and discussed in **Section 6.4** and **8.3** of this statement, it is my opinion that access for cyclists through the site (via Right of Way “E”) is deficient and should be improved.
278. In particular, this route would be attractive to cyclists due to a lack of obstruction from pedestrians and a direct path through the site between Kangaroo Bay Drive and the Marina. The current design and layout of parking presents a significant safety hazard for cyclists due

to 90-degree angle parking accessed directly from the accessway and risk of conflict due to vehicles reversing.

279. I note that this statement recommends that a substantial redesign of the proposed carpark is required to resolve major layout issues, and a key consideration in that design will be the provision of safe cycling access.

(c) The siting and design of the proposed development creates publicly accessible spaces and improves the passive surveillance of the project site and surrounding area, by avoiding the creation of concealment and entrapment spaces to an acceptable level.

280. I have not addressed this limb of the test as concealment and entrapment are not within my specific area of expertise.

Appendix A

Curriculum Vitae

Mark Petrusma

Senior Associate: Transport



Qualifications

Master of Traffic
Monash University (2014)
Bachelor of Engineering (Civil) (Hons)
University of Tasmania (2010)
Registered Professional Engineer
PE0008118

Key Skills

Transport Planning
Traffic Engineering
Intersection Modelling
Traffic Management Planning
Traffic Impact Assessment

Mark Petrusma is an associate transport engineer with over 15 years of professional experience in traffic engineering and transport planning.

He is an experienced expert witness with previous involvement at TASCAT, Tasmanian Planning Commission, VCAT and Victorian Supreme Court.

Mark's work covers projects ranging from small traffic studies and intersection designs to large-scale transport planning and road projects. He brings value to projects by providing deep insights into transport conditions currently experienced by road users and critically assessing changes in performance and behaviour responding to a range of potential scenarios.

Mark has particular experience in intersection modelling, bus network design and analysis, network planning, construction traffic management, local traffic management, transport impact assessment, and road safety, and works to implement best practises across his project work.

Mark has prepared evidence for numerous planning appeals under the Tasmanian Planning Scheme and various Interim Schemes, rezonings and other Planning Scheme Amendments at the Tasmanian Planning Commission, as well as a range of complex compulsory acquisition and compensation matters

Selected experience

Traffic & Transport Assessments for Environmental Impact Statements

- Parramatta Light Rail Stage 2 EIS
- Picton Road Interchange Stage 1 EIS
- Victorian Murray Floodplain Restoration Project EES
- Sassafras-Wesley Vale Irrigation Scheme Augmentation Project

Planning Scheme Amendments

- Stony Rise Village (Devonport)
- Hobart Showgrounds Masterplan (Glenorchy)

Planning Appeals

- 8 Cole Street (Sorell)
- 3A Giblin Street (Hobart)
- 18 Wyett Street (Launceston)
- 22 Stone Street (Launceston)
- 328 Porters Bridge Road (Meander Valley)
- 25 Oleander Drive (Whittlesea)