

19 August 2009

Mr. Henry Wong
General Manager
Manly Council
Belgrave Street
Manly NSW 2095

Dear Henry,

Re: Manly CBD Parking Study

Thank you for forwarding a copy of the Manly CBD Parking Study prepared by Gennaoui Consulting Pty. Limited. The Chamber would have appreciated the opportunity of being involved in the preparation of the Brief to the Consultant, particularly in designating the study area and in relation to the information sought in the Survey. However, the survey data compiled in the study gives us a very good data base of our parking assets and a good understanding of how, and by whom, the parking is being used.

The Study confirms what we already know that our parking “assets” are operating at capacity most of the time. There is little likelihood that we will see a significant increase in the availability of car spaces in the future, so the emphasis, going forward, must be in managing the existing on-street and off-street spaces to optimise their use/turnover for the benefit of local businesses, who after all have paid for the off-site facilities either through rates, parking levies or parking contributions over almost 50 years.

We have a number of comments/questions relating to the Study but initially we comment on the specific recommendations in Section S.4 of the report.

S.4.1 Amendment to Parking Code

Code Requirements:

The reference to RTA Guidelines is not really appropriate for a mature commercial centre such as Manly. What we now have in the Manly CBD is the result of over 100 years of development. Future development potential is somewhat limited and is more likely to involve renovation and extension of existing properties, with a few larger developments such as that proposed on the Coles site and the Manly Bargain Centre site. In areas such as the Sydney CBD and North Sydney, they are now discouraging additional parking in new developments to avoid increasing the vehicular traffic movements in their CBD. While we would not advocate going this far for Manly, we must accept that there will be circumstances where we want to see certain attractive changes of use or upgrades of dilapidated buildings, and we would not want to see a “blind” application of RTA type guidelines acting against these type of improvements.

The Chamber believes that the 2.5 spaces per 100m² for **commercial** is too restrictive and we should revert to the previous code of **1 space per 70m²**. The requirement of 15 spaces per 100m² for **refreshment rooms** may be appropriate for a McDonalds stand alone site at Blacktown, but is totally inappropriate for a densely populated area like Manly with excellent public transport and where at least 50% of the patrons can walk to the café/restaurant. We point out that 8-10 years ago such developments required NO parking spaces in Manly. The Study itself identifies the “ACTUAL DEMAND” for refreshment establishments in Manly at 2.11 spaces per 100m², which makes an absolute joke of the recommendation for 15 spaces per 100m². Also, the peak period for a lot of our restaurants is in the evening when there is plenty of parking available in our Car Parks.

To illustrate the absurdity of this requirement, a small café such as Inside Out in Belgrave Street with 100m² would require 15 spaces or a contribution of \$450,000 if they could not provide the spaces. The Consultant cannot justify this recommendation, and it does not acknowledge the particular characteristics of the Manly CBD or the fact that the CBD commercial ratepayers have already largely financed all the Public parking stations in Manly. The fact that Council seeks to apply this parking requirement to a “change of use” application for existing properties where the applicant cannot provide parking, and is then asked to make a parking contribution that runs into the \$100k’s is absurd, and completely restricts the ability to remix and upgrade the retail mix and property presentation in Manly.

Employee (Long Stay) Parking:

The Study recommends that Council’s code “must ensure that adequate employee parking is provided “on site”. This is an admirable objective but runs counter to Council’s own policy of encouraging people to use public transport. It is also very difficult to police whether spaces are used by staff or rented out to other car users who are prepared to pay \$3,000 pa for the space. The Study shows that about 20% of the parking spaces in the Public Car Parks are leased to “permanents” and we would want to see this adopted as a maximum allocation of our scarce parking resources for “all day parking”. Council should immediately discontinue the “Early Bird” offer or restrict to the Manly National. The very survival of our retail and commercial operators depends on the availability, and turnover, of the limited parking we have in Manly. We also request specific details of the amount of parking used by Council staff on a “permanent” basis. **Permanent parking should only be available to people who work in Manly, and should not exceed 20% of available spaces (including the number of spaces used by Manly Council staff).**

S.4.1 Parking Improvements:

We do not have any problems with the Study recommendations but would caution Council to not become overzealous in the enforcement of on-street time limits. There is nothing more certain to drive away our customers, if Manly gets the reputation of being out to “book” you as soon as you overstay the time limit by 5 minutes. There should always be a “period of grace” to allow for parkers who might be 5-10 minutes late.

Unfortunately, Manly already has this reputation on the Peninsular, despite the findings of the Study that suggests that Manly has been "lax" on enforcement. We support a well managed enforcement protocol that weeds out serial offenders and parkers who overstay the parking limit by a considerable margin.

Other very important improvements that we would like to see are :-

- Upgrade the entry/exit to Pacific Waves Car Park. The exit is very "tight" and Council needs to find an alternate location for the equipment in the old toll booth to allow improvement.
- Upgrade the entry/exit of the Manly National Car Park and try and overcome the need to access the ticket machine while on the ramp (a difficult problem but we have to find a solution if this car park is to become more user friendly).
- Move the majority of the permanent parkers to Manly National to free up parking in the other better located car parks. Permanent parkers are being offered a very reasonable parking rate and should be prepared to walk from that location.
- Upgrade Security and Lighting in Whistler Street CP and Manly National to make them more user friendly, particularly at night.
- Remove Council cleaning and other equipment from the valuable parking spaces in the Peninsular Car Park. This parking was provided for shoppers not for Council equipment storage.

S.4.3 Parking for Disabled:

There may be a deficiency of disabled spaces based on RTA guidelines but is there a real deficiency. Does Council get complaints from disabled drivers ? We have a real shortage of parking in Manly at busy times and drivers are very annoyed when they see parking stations and street parking full yet most of the disabled spaces near Whistler Street car park are empty. Rangers should survey the available disabled spaces over a set period and report on their use/availability, before implementing this recommendation.

S.4.4 Motorcycle/Scooter Parking:

We agree there is probably a need for additional motorcycle/scooter parking, but this needs to be "timed" and properly policed by Rangers. In times past there were scooters parked all day near Barchino. Agree with recommendations.

NOTE: Bicycle Racks: The Study does not deal with bicycle parking but this issue is now a major problem in Manly. On most days there are bicycles chained to every post on the Wharf forecourt (and elsewhere in the CBD). If motorists and scooter riders have to behave responsibly so should bicycle owners. Last year the writer identified locations that would have supported bicycle racks for an additional 200+ bikes (some have been installed).

Council must have an enforcement policy to fine bicycle owners who litter the CBD with their bikes with no regard to the public's safety or the aesthetics of our CBD. We need to ensure there are adequate bike racks positioned around the CBD and any owner then chaining their bike to poles or other objects (for long periods) must be fined.

S.4.5 Improvements to On-Street Loading Zones:

We agree with the recommendation for the additional loading zone near Henrietta Lane. We do not agree with the suggestion that the time limit for the Loading Zones be increased to 30 minutes. Rangers can be instructed to allow drivers to overstay the 20 minutes, but we need to ensure that these spaces are turned over. Also, we do not agree with the additional signage suggested – delivery drivers will find their way and we need less, not more, signs in the CBD.

Other Issues:

Resident Parking Permits:

The Chamber has already highlighted to you the adverse impact that Council's Resident Parking Permit scheme has had in the streets that have timed parking on the periphery of the CBD. Previously these streets provided some longer term parking for people who needed to do business in the CBD or go to hairdressers/restaurants. Now you walk down Victoria Parade, Eustace Street, West Promenade and Pittwater Road (there would be others) and almost every car has a Resident Parking Permit that allows them to park all day. We know from observation that the majority of these cars are driven to Manly each day by people who work in Manly or go to the City – they are not cars that belong to people who reside in those streets. The scheme is being abused.

We ask the very pertinent question “Why should a person who buys/occupies a One bedroom unit, that has no parking in, say, Eustace Street be entitled to park their car all day in such a prime position? And, equally why should a person who has a car park attached to their unit be entitled to a permit. And to make matters worse they can, for a very small cost get another 2 permits. We know that many of these permits are given to friends or sold. Council's Resident Permit Scheme needs to be completely reviewed/revamped, particularly in the streets surrounding the CBD, to overcome these abuses.

Similarly, it has been well publicised in the media that there is a “racket” in disabled parking stickers, and Manly's Rangers should be instructed to identify anyone who is using disabled spaces, while seemingly not disabled.

Finally, the Chamber appreciates that Council has acted on our request for a comprehensive CBD Parking Study so that we can review the way in which these vital assets are managed. We will never have sufficient parking to meet demand in our peak periods, but it is important that we constantly monitor the usage of the parking assets to ensure that they are managed to optimise the benefits for the various businesses in Manly. We accept that Council has on-going costs associated with the operation and maintenance of these facilities.

/5

Council parking charges after the 2 hour free period (which we regard as sacrosanct), and in the evening, need to be set at levels that do not deter people from coming to Manly, but encourage the turnover of spaces,

We look forward to discussing the Study with Council, and would welcome the opportunity to address Councillors if the recommendations are to be debated. The Manly CBD is a very dynamic commercial centre that trades for long hours, seven days a week, and relies very heavily on our parking assets to compete with other retail and tourism locations.

We trust that our comments will be fully considered before any changes are made to the current parking management in the Manly CBD

Yours sincerely

Bob Smith
President