



Mr David Schober  
A/CEO  
Shire of Denmark  
South Coast Highway  
Denmark WA 6333

Wednesday, 18 December 2019

**Submission regarding proposed parking policy**

Dear David,

Please accept this submission from the Denmark Chamber of Commerce regarding the draft town planning scheme policy No 47: Town Centre Parking and Transportation.

The Chamber would like to congratulate the Shire for its continued efforts in revitalising the central business district and working with local business owners to enhance the experience in our town's shopping district.

The draft parking policy objectives and aspirations are all valid and supported by the Chamber. However, we question the assumption that people will be increasingly using bicycles to get to the CBD, particularly given Denmark's climate and topography and the age of Denmark residents, along with the propensity for visitors to use their cars. Distances between very far flung residences and the CBD would also militate against bicycles becoming a significant mode of transport into town.

The inclusion of the end-of-trip facilities and sustainable transport measures (bikes, etc) again are an interesting idea, but we worry that the obligations will act as a new burden on development while not delivering much value to the community. Whilst we support the aspiration that our Shire's population should become more active, the reality is that many people are by necessity reliant on cars, of an age where they are not going to ride bikes (even electric ones) up Mount Shadforth Hill or over long distances or, in winter, especially, at all.

What the Shire really needs is a sustainable transport strategy. This should address the issue of parking along with other key elements that support the reduction of car use, such as public transport. Such a strategy would need to identify potential additional public car parking sites, possibly, for example, utilising existing road reserves and other appropriate reserves for overflow parking. The strategy should address issues such as time sharing (or reciprocal rights) of car parking areas (e.g. wine bars that open only in the evening could share their car bay obligations with retail stores that are closing when the wine bar is opening) and the provision of cash in lieu of parking spaces.

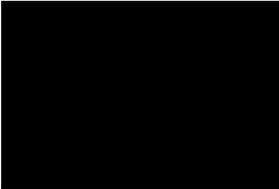
21 Apr 2020 - Attachment 8.1.3a

Without an overall strategic approach to transport and parking, the Shire risks having its status as a key tourism destination, undermined. Whilst we want our main shopping streets to be as pedestrian friendly as possible, the reality is that parking is still required for the increase in visitors during our peak periods.

A strategic approach would also have to consider whether the change in the parking requirements for the development of small bars / cafes and consulting rooms would effectively result in other businesses under development having to take up the future slack.

The Chamber of Commerce supports the Council's desire to reduce congestion in the CBD and identify sustainable options for future parking issues. We would request that Council consider an integrated transport strategy that addresses the issue of public transport alongside vehicle and alternative transport options.

Yours sincerely,



On behalf of

John Maxwell  
President  
Denmark Chamber of Commerce Inc.

# RD Thornton, MP Thornton & JW Burton



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MS	✓

Shire of Denmark  
South Coast Highway  
Denmark WA 6333

Re: Draft Town Planning Policy No 47  
Submission

I make the following comments on parking requirements in respect to the objectives of the policy.

The city's of Subiaco, Canning and Cambridge recently advertised or approved schemes require a ratio of 1 parking bay per 20m<sup>2</sup> of retail floor space in their inner city core. This is in comparison to 1 bay per 40m<sup>2</sup> in Denmark. Public transport in the city of Subiaco and Cambridge is possibly the pinnacle in Perth, both being serviced by two train stations and multiple bus routes at regular times. Denmark has no public transport.

State Planning policy 4.2 (Activity Centre) sets a ratio of 4-5 bays per 100m<sup>2</sup> (double Denmarks TPS3 requirement). Activity Centres are serviced by public transport and are on major arterial corridors. An example is the Karrinyup shopping centre has included (in their upgrade) 700 additional car parking bays (multi level).

No public transport is available from the residential precincts to the inner core commercial centre of Denmark. An aged population, peak parking in holiday periods and the spread of our residential population means adequate

parking is a priority in our inner core. Bicycle use is an aspiration due to terrain and distance in Denmark.

The Denmark townsite previously had an issue with inadequate parking 10 years ago. Council made a concerted effort to address this issue with approximately 100 additional bays created (\$300,000 spent). Two new consulting rooms provided parking as required by the scheme provisions.

Denmark business already has an issue with people shopping in Albany. The Albany shopping centres and businesses are cognizant of the fact you need easy parking, drawing shoppers from the great southern region, including Denmark. At times business does find it onerous financially or cannot find adequate land to meet the parking requirements. However, to reduce the parking requirements for some business activities (restaurants, consulting rooms) which are generally high end car users to the detriment of other business activities will ultimately affect the viability of existing established retail/office businesses due to the lack of parking spaces.

The policy document has failed to give full disclosure on the effect changes to Table 1 would have on parking requirements. Councillors should be provided with examples of restaurant and consulting room requirements using a comparison of GLA for existing premises compared to the proposed requirements.

If the intent as outlined in the policy introduction is the promotion of cafes, restaurants and small bars 'outside of usual business hours' without the imposition of the standard parking provisions, this can be achieved by reciprocal parking with legal agreements in place.

I also make the following observation –

The Planning and Development (Local Planning Schemes) Regulations 2015 clearly state that local authorities policies cannot override the provisions of the Scheme . Relevant Sections of the regulations

.Division 2 – Local Planning Policies Clause 3 (5)

This is further defined under schedule 1 – model provisions for local planning schemes – clause 10.

The avenue for any adjustment to parking requirements is via a scheme amendment or the Shire of Denmarks proposed TPS No4.

# **DRAFT LOCAL PLANNING POLICY NO. 47 – TOWN CENTRE PARKING AND SUSTAINABLE TRANSPORTATION (APR 2020)**

## **1. INTRODUCTION**

The Council seeks to promote the ‘inner core’ of the Denmark town centre as the key commercial area in the Shire; making it an even better place to visit, shop, enjoy and stay. The Council’s vision is that the Denmark town centre has a high level of amenity and activity and a well-defined sense of place. This includes promoting development which activates the town centre, including outside usual business hours, such as cafes, restaurants and small bars.

To achieve the above, the Council seeks to promote business activity, encourage appropriate redevelopment and development and promote sustainable transportation options such as walking and cycling. To assist in implementing this, until at least the finalisation of a new Local Planning Scheme, the Council will support varying certain planning standards to achieve stated Policy objectives.

Although an adequate supply of convenient parking is essential, the Council also appreciates that car parking areas should not dominate the structure of the town centre given it may make the town centre less attractive and vibrant. There is already adequate parking to support the town centre on private property, in the street and in public parking areas without unduly constraining new development with excessive parking requirements. Relaxing the parking requirements is one way in which the land use planning system can assist to incentivise development.

Other requirements and standards of the Scheme, Policy 26.1 and Policy 31 continue to apply including the preferred location and design of car parking and delivery areas and the requirement to pave/seal/linemark and drain carparking and access areas.

This Policy applies to change of land use applications, where an intensification of land use is proposed, development and redevelopment applications within the area as defined in Figure 1.

## **2. POLICY BASIS**

This is a local planning policy prepared under the *Planning and Development (Local Planning Schemes) Regulations 2015* and the *Shire of Denmark Town Planning Scheme No. 3* (the ‘Scheme’).

More specifically, this Policy applies Clause 6.2 of the Scheme, that allows for the modification of any development standard, and establishes the consistent manner in which Council agrees to relax specific Scheme parking requirements.

## **3. OBJECTIVES**

The objectives of this Policy are to:

- promote business activity along with appropriate redevelopment and development in the town centre;
- assist in creating a vibrant town centre that is increasingly resilient;
- establish guidelines relating to the rate of providing car parking bays for redevelopment, new development and changes of use;
- facilitate the provision of adequate parking facilities within the town centre;
- provide guidance as to when the local government may vary the parking provisions of the Scheme for development within the town centre; and
- promote sustainable transportation including walking and cycling.

#### 4. DEFINITIONS

Definitions in this Policy are as per the Scheme and those outlined below:

- ‘Device’ means a thing to or in which one or more bicycle frame(s) and wheels can be locked, and includes rails, bicycle lockers and bicycle compounds.
- ‘End-of-trip facilities’ are secure bicycle storage and other secure ‘end of trip’ facilities such as lockers and showers.
- ‘Parking bays’ means parking spaces.

#### 5. POLICY PROVISIONS

##### 5.1 General

This Policy supports a reduction in the number of car parking spaces set in Appendix XI – Parking Standards in the Scheme for uses in Table 1 for the area shown in Figure 1. The Policy also sets a lower rate for cash-in-lieu payments to facilitate appropriate development and redevelopment.

<b>Table 1 – Comparison of Parking Space Requirements</b>		
<b>1. Land use</b>	<b>2. Scheme Parking Space Requirements</b>	<b>3. Local Planning Policy No. 47 Parking Space Requirements</b>
Consulting Rooms	First Consultant 4 bays Additional Consultants 4 bays each	1 per 40m <sup>2</sup> of Gross Leasable Area (gla)
Offices and Commercial Premises	1 per 40m <sup>2</sup> gla	1 per 40m <sup>2</sup> gla
Places of Public Assembly and Entertainment	1 per 4 persons	1 per 40m <sup>2</sup> gla
Restaurants	1 per 4 persons	1 per 40m <sup>2</sup> gla
Retail shops	1 per 40m <sup>2</sup> gla	1 per 40m <sup>2</sup> gla
Small bars	Not applicable (n/a) – the local government generally applies 1 per 4 persons	1 per 40m <sup>2</sup> gla
Cafes	1 per 4 persons	1 per 40m <sup>2</sup> gla
Alfresco dining	n/a	No spaces required
Residential uses	n/a	As per the R-Codes, unless varied in an approved Local Development Plan; parking to be provided on-site
Short-stay accommodation	n/a	At least one bay per unit or as determined by the local government; parking to be provided on-site
Uses not listed in Appendix XI of the Scheme	Refer to Clause 5.21 of the Scheme.	The local government will determine the number of parking spaces having regard to: <ul style="list-style-type: none"> <li>• the nature of the proposed use;</li> <li>• the number of employers and employees likely to be employed or accommodated with the proposed use of the land;</li> <li>• the likely demand for visitor parking;</li> <li>• the orderly, proper and sustainable planning of the area;</li> </ul>

		<ul style="list-style-type: none"> <li>• the times of peak usage and opportunities to share parking;</li> <li>• this Policy and its objectives; and</li> <li>• any other matter considered relevant by the local government.</li> </ul>
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\* The lower parking space rate in column 3 above applies where agreed sustainable transport measures are provided to the satisfaction of the local government; guidelines are provided in this Policy.

The local government reserves the right to amend rates for the provision of on-site car parking spaces when circumstances change such as the creation of a more resilient town centre or to reflect a new Local Planning Scheme.

## 5.2 Car parking

### Existing development

The local government shall determine the extent of car parking required in each case, having regard to the extent of the floor space extensions and the nature of the land use.

Where redevelopment of an existing approved building is proposed, then the gross leasable area (gla) of the existing building will be deleted from the gross leasable area (gla) of the new building for determining additional car parking requirements (i.e. provided that existing parking bay numbers are retained, additional parking is only required for new floor space established). This provision is therefore not intended as a control or means to achieve retrospective provision of car parking to service an existing development.

### Residential & Short-stay (Holiday Accommodation) development

All parking for residential and short-stay developments, whether free-standing or as a component of mixed-use development, shall be provided on-site.

### Non-residential development

In the town centre, except for resident car spaces and staff car spaces expressly agreed to by the local government, all car parking areas must be freely available to the general public. Closure of car parks, at certain times, for reasons of security or other agreed reasons may be approved by the local government.

### Special purpose bays

In addition to the provision of car parking spaces, the local government may where relevant require the provision of areas for parking of vehicles for people with disability and parking bays marked exclusively for the use of motor cycles, delivery and services vehicles, taxis, buses, coaches, courier services and for other relevant forms of motorised transport.

### Joint use of parking facilities

Clause 5.22 of the Scheme allows for Council to consider sharing of parking areas by land uses whose peak parking demand times do not coincide.

### Cash-in-lieu of on-site parking

Even with a reduction of car parking space standards set in this Policy, there will be instances where the required number of car parking bays cannot be provided on site for non-residential development. In these instances, the local government will consider the applicant meeting the difference through a cash-in-lieu payment.

Clause 5.23 of the Scheme sets out the method of calculation of cash-in-lieu payments for car parking. In summary, the payments relate to what it would have cost in terms of the land value along with sealing and draining the car parking spaces and vehicular manoeuvring areas. To facilitate appropriate development the local government will accept a subsidised rate for cash-in-lieu parking.

**The rate is \$5000 per car parking space for 2019/20 which is indexed to the Australian Consumer Price Index.** The local government will set the cost per car parking space in the adopted Fees & Charges.

Where desirable to facilitate the conservation of a heritage place, or to enhance or preserve heritage values of a place included on the Heritage List or within a Heritage Precinct, a cash-in-lieu payment may be provided up to a maximum of 100% of the car parking and vehicular manoeuvring costs.

### Modifying development standards and requirements for parking

Where, in the opinion of the local government, conditions are such as to render full compliance with the provisions of this Policy impractical, the local government may permit such departures as are warranted in the circumstances of the case.

The local government will require the proponent to appropriately justify modifications to development standards and requirements for car parking provision. In addition to considering clause 6.2 of the Scheme, the local government will consider variations to this Policy based on the merits of the application and the objectives of this Policy.

## **5.3 Sustainable transportation**

### Support for sustainable transportation

The local government supports sustainable transport, including walking and cycling, and acknowledges the need to facilitate supportive environments including bicycle parking and end-of-trip facilities. New developments should endeavour to include bicycle parking alongside car parking. Large-scale development will be encouraged to also provide end-of-trip facilities including lockers, change rooms and showers. The local government also promotes a town centre that is increasingly designed for pedestrians to assist in creating a more vibrant, economically stronger and socially safer place.

### Pedestrian movement and links

The local government will seek to ensure there are safe and convenient routes for pedestrians, including disabled persons, between car parks and buildings on each development site.

The local government will seek to create a sense of place and positive environment for pedestrians by providing interest for pedestrians at ground level. Where new linkages are proposed which benefit the public, in the opinion of the local government, the local government may reduce parking

requirements for development applications which propose and implement the new linkages. The pedestrian links should be convenient, attractive and safe.

### Bicycle facilities and spaces

New development or major redevelopment are to provide facilities and spaces for bicycles for staff, customers/visitors and the public. Existing development will be encouraged to provide bicycle parking and end-of-trip facilities when upgrading developments.

### Rate of bicycle parking provision

The local government will determine the number of bicycle spaces/facilities depending on the nature of the development. As a guide, the following minimum levels of bicycle parking should be provided on site as outlined in Table 2:

<b>Activity/ Use</b>	<b>Number of Bike Parking Spaces for Employers/Employees</b>
Residential	1 space per dwelling unit (storage unit)
Short stay accommodation	1 space per 10 guest bedrooms
Offices, commercial premises and retail shops	1 space per 150m <sup>2</sup> of gla
Small bar, café, restaurant, eating establishments and hotels	1 space per 100m <sup>2</sup> of bars and public areas, including lounges, beer gardens and restaurants
Other non – residential uses	1 space per 150m <sup>2</sup> of gla

Development which provides bicycle facilities set out in Table 2 can seek a reduction in car parking provision outlined in Table 1.

### Design of bicycle parking devices and facilities

Bicycle parking devices and facilities are installations that allow for the secure and convenient parking of bicycles. All bicycle parking is to comply with *AS 2890.3 - Bicycle Parking Facilities and Austroads Part 14 – Bicycles*.

Where the building is built up to the front boundary, the local government may accept short-term bicycle parking spaces being provided in the road reserve adjacent to the building, located so as to provide a minimum clear footpath width of 2.0m directly adjacent to the building unless otherwise approved by the local government, subject to the standards defined in AS 2890.3 being met. Long-term bicycle parking must be provided on site (not within the road reserve).

### Provision of End-of-Trip Facilities

Major redevelopment and new development shall provide ‘end-of-trip facilities’ which include destination facilities provided for bicycle commuters such as showers, change rooms and lockers to the satisfaction of the local government.

## 6. APPLICATION PROCEDURE

### Application requirements

When applying for development approval, in addition to matters set out in the Application for Development Approval Form, the applicant may also be required to provide:

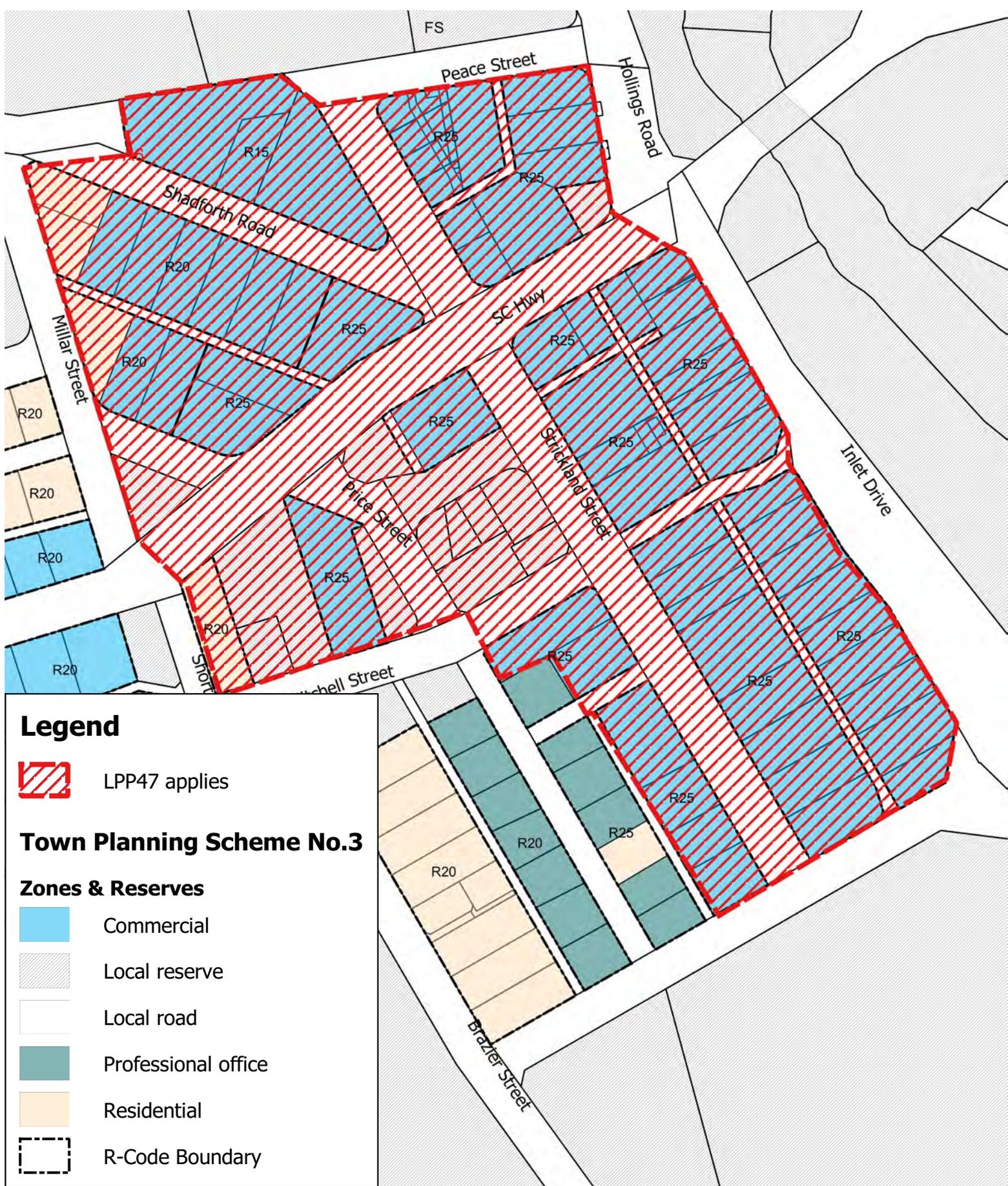
- a clear explanation of how the proposed parking supply has been calculated with relevant reference to this Policy;
- parking bays for people with disability;
- sustainable transportation facilities;
- turning templates for the likely maximum size of vehicles accessing the site; and
- a traffic impact statement or traffic management plan.

### Assessment criteria

When considering applications for development approval in the town centre, the local government will have regard to:

- any relevant provisions contained in the Scheme;
- relevant legislative requirements;
- relevant State Planning Policies, Development Control Policies and Planning Bulletins published by the Western Australian Planning Commission;
- any relevant local planning policy;
- the nature of the proposed development;
- the number of employees likely to be employed on site;
- the anticipated demand for employer, employee, customer, visitor and resident bicycle parking;
- the orderly and proper planning of the locality;
- Austroads Part 14 – Bicycles; and
- this Policy.

Related Policies	<i>Town Planning Scheme Policy No. 15 Townscape Policy</i> <i>Town Planning Scheme Policy No. 17.1 Alfresco Dining &amp; Trading in Public Places</i> <i>Town Planning Scheme Policy No. 26.1 South Coast Highway Commercial Developments</i> <i>Town Planning Scheme Policy No. 31 Commercial Strategy</i>
Related Procedures and Documents	<i>Planning and Development (Local Planning Schemes) Regulations 2015</i>
Adopted	Adopted ... 2020.



**FIGURE 1** LOCAL PLANNING POLICY NO.47 - TOWN CENTRE PARKING & SUSTAINABLE TRANSPORTATION



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# **LOCAL GOVERNMENT CAR PARKING DISCUSSION PAPER**

***Is planning for parking more than just ratios?***

**October 2019**

Prepared by:

WALGA and the Department of Transport

In collaboration with:

Local Government Car Parking Reference Group &  
Department of Planning, Lands and Heritage

**21 Apr 2020 - Attachment 8.1.3c**

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# 1. Introduction

## 1.1 Background

In 2017 the Western Australian Local Government Association (WALGA) convened a workshop with Local Governments to discuss new development car parking requirements. Participants at the workshop noted that:

- Minimum parking ratios are the most commonly applied approach for managing increased demand for parking generated by new development
- The application of parking ratios may not be the best approach for meeting parking and other transport needs generated by new development
- The rationale for applying minimum parking ratios and how these ratios have evolved over time is uncertain, and
- Minimum parking ratios may be inhibiting the achievement of optimal built form outcomes and other strategic community objectives.

In response to the workshop's findings, WALGA and the Department of Transport (DoT) commissioned Cardno to examine the rationale being used by Local Governments in Western Australia to identify and apply minimum car parking ratios. The report found that minimum parking ratios are likely to be poorly related to demand generated by new development. This is largely because existing ratios have usually been informed by a patchwork of sources and while these sources provide a convenient set of tools for identifying and codifying parking requirements, they are not specifically designed to meet the demand for parking and travel generated by a particular development (Cardno, 2018). Therefore, the application of minimum parking ratios as a policy instrument may be impeding the optimal use of land and the achievement of a community's environmental, economic and social objectives, as observed by Local Governments at the 2017 workshop.

## 1.2 Aim and Scope

This discussion paper has been prepared by the DoT and WALGA, in collaboration with a Local Government Car Parking Reference Group (discussed in Section 1.5) and the Department of Planning, Lands and Heritage (DPLH), with the primary aim of discussing policy options which provide an alternative to minimum parking ratios.

At the 2017 workshop held at WALGA, Local Governments also identified a number of other car parking related issues which arise through the development assessment process, such as assessing proposals for changes in land use. This discussion paper also aims to discuss these issues and potential policy options.

As we note throughout the discussion paper, private off-street parking supplied by new development is one component of an integrated but complex transport system made up of, and influenced by, many different components such as: the supply and management of on-street parking; public off-street parking; and, public and active transport networks, among others. Consequently, this discussion paper necessarily extends beyond private off-street parking and

the application of minimum parking ratios, and considers other components of the integrated transport system which are likely to be influenced by demand for parking and travel generated by new development.

This discussion paper does not intend to replace the [Austroads Guide to Traffic Management Part 11 \(Parking\)](#). Rather, this discussion paper sets out particular car parking issues raised by Local Government planning practitioners in Western Australia and provides an explanation of the policy options which may be used to help resolve these issues. The Austroads publication remains an excellent source of information for organisations with car parking related responsibilities and should be referred to by management authorities who seek further information and more general parking management guidance.

Readers should also note that this discussion paper does not discuss car parking law enforcement. While this is a critical element of parking supply and management, it lies beyond the scope of this paper.

### 1.3 Purpose

The purpose of the discussion paper is to:

- a) Discuss car parking issues raised by Local Governments in Western Australia which predominantly relate to managing the demand for parking and travel generated by new development
- b) Discuss potential policy options for addressing these issues, and
- c) Seek feedback from Local Governments, and other key stakeholders where appropriate, about each of the issues and policy options discussed, with the aim of using this information to prepare a Local Government car parking guideline.

### 1.4 Document Structure

The discussion paper consists of five main sections:

- Section 2: Context for Parking Policy Review
- Section 3: Supply and Management of Private (Off-street) Parking
- Section 4: Supply and Management of Public (On-Street) Parking
- Section 5: Supply and Management of Public (Off-street) Parking
- Section 6: Autonomous Vehicles, Rideshare and Car Parking

Each of these sections proposes a set of questions for Local Governments to consider when preparing comments and feedback on this discussion paper. Please note that if a question is not applicable then that question can be skipped.

### 1.5 Next Steps

The information collected through the release of this discussion paper, to all Local Governments in Western Australia and other relevant stakeholders, will be used to prepare a parking guideline for Local Government, specifically to address issues associated with the use of minimum parking

ratios outlined in Cardno (2018). The guideline will be drafted by the DoT and WALGA in collaboration with the Local Government Car Parking Reference Group and the DPLH.

## 1.6 Planning Reform

During the preparation of this discussion paper, the State Government released the *Action Plan for Planning Reform* (Department of Planning Lands and Heritage, 2019) and draft *State Planning Policy 7.2: Precinct Design* (WAPC, 2019).

The *Action Plan for Planning Reform* proposes a number of actions to be trialled by inner city Local Governments in 2020 and if progressed, may directly or indirectly influence the regulation of car parking in other areas. This discussion paper notes throughout the document where potential synergies exist between the policy options and the planning reform actions. Staff from the DPLH planning reform team attended the September 2019 reference group meeting to discuss the planning reforms and opportunities for collaboration with this project. Collaboration with the DPLH planning reform team is ongoing.

Draft *State Planning Policy 7.2* proposes the use of a performance-based approach to precinct design. Parking and access is specifically discussed in the policy guidelines in Design Element 3: Movement (p.39). The objectives of this element emphasise the need for precincts to supply an appropriate amount of parking, design that facilitates amenity and access, and adaptable design to accommodate emerging technologies.

## 1.7 How to Provide Feedback

Local Governments can provide feedback via email or within this document to:

- Ashley Robb (WALGA) at [arobb@walga.asn.au](mailto:arobb@walga.asn.au)
- Louise Fogarty (Department of Transport) at [louise.fogarty@transport.wa.gov.au](mailto:louise.fogarty@transport.wa.gov.au)

Please provide all feedback by **18 November 2019**.

## 1.8 Members of the Local Government Car Parking Reference Group

The Local Government Car Parking Reference Group meets regularly to help guide the preparation of the discussion paper and guideline, to help ensure relevance to Local Governments. Local Governments participating on the group include: City of Bayswater; City of Canning; Town of Claremont; City of Cockburn; City of Fremantle; City of Joondalup; City of Perth; City of Stirling; and, Town of Victoria Park.

WALGA and the DoT would like to thank the staff involved from these Local Governments and the DPLH for their important contributions and support during the preparation of this document.

## 2. Context for Parking Policy Review

This section discusses a range of overarching considerations that management authorities should consider when reviewing parking regulations, policies and management approaches.

### 2.1 Car Parking and Implications for Communities

Western Australian communities are highly dependent on cars as a mode of transport. Multiple factors are likely to have contributed to this dependence, including: an abundance of space; demand for residing in low density suburbs; development of most urban areas following the introduction of motor vehicle transportation; high levels of car ownership; policies which favour segregated and low-density land uses; high levels of public investment in road infrastructure compared with alternative transport modes; and, notably, an ample supply of off-street parking, usually required at the discretion of planning authorities as a condition of development approval, and commonly provided at below-market rates to the motorist (Brown, 2012) (Shoup, 1999).

Given these factors, car parking in Western Australia has become a substantial, widespread land use, as in all other Australian states and many countries around the world (Berg, 2016) (Shoup, 2019). For instance, in 2012 approximately 8,750 hectares or 4.6% of developed land within the Perth and Peel regions was allocated to parking related infrastructure (Brown, 2012) (Department of Planning, 2012). At the individual lot level, new development car parking requirements commonly mandate that a larger proportion of the lot is allocated to accommodate car parking than to facilitate the main service or function offered by the new development (Goodman, 2018).<sup>1</sup>

**Car based mobility has an important role in supporting commercial activity and facilitating access to work, education and recreation. However, incentivising high levels of car use through parking provision can entrench a culture of motor vehicle dependence, ownership and usage (Shoup, 2018), marginalise other transport modes and lead to suboptimal land-use development patterns.** High levels of car use can also inhibit the achievement of accessibility and sustainability objectives such as increasing neighbourhood and activity centre walkability, promoting compact mixed land-use and reducing air pollutants. Importantly, the perception that car parking is free to society or can be provided at low-cost to the motorist is a myth which has been comprehensively debunked; parking provision is usually expensive and is paid for by everyone, both users and non-users (Edraki, 2019) (Shoup, 2019). Finally, car parking detrimentally affects the natural environment by increasing impervious surfaces and reducing tree canopy in urban environments.

Effective car parking management can help to address these various issues, as discussed in this paper.

### 2.2 Car Parking, Land Use and the Integrated Transport System

Car parking is one component of an integrated but complex transport system made up of many different components which influence each other. For instance, car usage is influenced by: road

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<sup>1</sup> This short [video](#), published by the City of Ottawa (Canada), explains some of the implications associated with new development car parking requirements.

congestion; public transport availability; parking availability, at origin and destination; walking and cycling infrastructure; travel time; and, car ownership and licensing.

When identifying policy options to address parking related issues, such as traffic congestion in an activity centre, or to help achieve a transport related strategic objective, such as encouraging shifts to other transport modes like cycling and walking, it is important for management authorities to recognise these inter-dependencies and the potential avenues that these components and relationships offer.<sup>2</sup>

It is also important to recognise that parking consists of three main interrelated sub-components, expanded upon as follows:

*On-street parking* includes parking on the street in a marked or unmarked bay. On-street parking often provides easy access to destinations, gives greater perceptions of safety to users because it is visible, can be more cost efficient to implement than off-street parking, helps to address overspill from off-street parking, can provide buffers for pedestrians from traffic, and can be used as traffic control to reduce speeds. However, on-street parking also requires street space which could be used by others such as cyclists, is somewhat limited in quantity due to its location being on a street or road, can conflict with efficient vehicle movement, and where unregulated, can limit customer access to local businesses.

*Off-street public parking* facilities are shared between users. Off-street public parking is often adjacent to multiple land uses and may be provided at grade (ground level) or in a multi-level facility. They may be operated by a local authority or a commercial operator. Off-street parking can take pressure off on-street parking supply, may be cheaper to operate where parking and associated costs are shared between multiple facilities, may help new development applicants meet new development parking requirements more cost efficiently, and where multi-level facilities are in place, can increase land use efficiency. However, off-street public parking can encourage motor vehicle use, as the aggregated parking supply is likely to be greater than if parking is fragmented, concentrate foot traffic in certain areas to the detriment of other areas, and often requires land in highly sought locations which could facilitate other land uses and therefore, can be costly.

*Off-street private parking* facilities are provided by new development, for the exclusive use of its users such as residents of a dwelling or in the case of commercial development, for the exclusive use of staff, customers and service vehicles. Off-street private parking helps to ensure that specific users are guaranteed a parking bay. It also helps to minimise overspill into on-street parking supply, is close to an end destination and is therefore convenient for and desirable to property owners and customers, and can facilitate reciprocal and shared parking uses. Private off-street parking is often provided to accommodate peak demand periods and therefore, is often underutilised, leading to an inefficient use of land, higher development costs and uninviting streetscapes.

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<sup>2</sup> For an example of how management authorities are giving consideration to these different components, see the Town of Victoria Park's [Integrated Movement Network Strategy](#) (2013).

Recognising the different sub-components of parking provides management authorities with greater opportunity to identify effective methods for improving the regulation of parking and travel demand generated by new development, and influencing the integrated transport system to help achieve strategic community objectives.

### 2.3 Strategic Community Objectives and Car Parking

Changes to the supply and management of these three car parking sub-components can help Local Governments achieve broader strategic community objectives. For instance, changes to car parking requirements of new apartment buildings can reduce development costs and in-turn improve access to more affordable housing. Changes in on-street parking management can help communities improve business access to customers and in-turn, improve the vibrancy, functionality and safety of activity centres and public places. Changes to off-street public parking facilities can help improve the appearance and safety of streetscapes.

Common strategic community objectives, outlined in Local Government strategic community plans, which may be influenced by changes to on-street and off-street parking, include:

- Improve business access to customers and staff
- Reduce traffic congestion in activity centres
- Improve the appearance and safety of streetscapes
- Improve vibrancy, functionality and safety of activity centres and public places
- Improve parking facilities in activity centres
- Improve active transport facilities and shifts to other modes, such as walking and cycling
- Improve access to public transport
- Improve access to affordable housing, and
- Promote a healthy and active community.

### 2.4 Trends Influencing Car Parking

A broad range of emerging trends and technology changes are influencing car driver behaviours and in turn are likely to influence demand for car parking. These trends include:

- *Return to the city* – The State Government is aiming for 47% of all new dwellings to be constructed in existing urban areas by 2030 (Rowley, et al., 2017), reflecting a recent trend toward the regeneration of inner city areas and housing additional populations in these suburbs (Glaeser, 2011). Denser urban populations facilitate higher levels of in-person interaction and knowledge sharing, recognised as pre-requisites for growing specialised skill sectors (also known as knowledge economies). However, denser urban populations can create a tension for more road and parking infrastructure, potentially limiting other more productive land uses if improperly managed.
- *Peak car* – Declining trends in vehicle-kilometres travelled per capita, number of driver licenses issued, and fuel use, indicate that car use may have peaked in many developed countries (Weissmann, 2013) (Cross, 2018). Many theories for these trends exist, including increasing urbanisation, environmental awareness and fuel costs. These

changes are likely to reduce demand for parking and increase demand for alternative transport modes.

- *Public and active transport revival* – Related to the renewed demand for dense, walkable urban centres, there has been a global and local resurgence in public transport investment. This is partly due to the capacity of rail, in particular, to transport large numbers of people in a constrained area, supporting the dense agglomerations required to grow knowledge-intensive industries (Newman & Kenworthy, 2015). Additionally, public funding expenditure on active transport continues to grow. Shifting trips to transport modes alternate to the private car reduces demand for parking and increases the demand for other uses of the space currently taken up by cars.
- *Sustainability* - The consideration of economy, society and the environment is becoming mainstream practice in policy and decision making practices. Sustainability considerations in policy making are likely to influence the cost to provide and/or the regulations placed on vehicles and fuels. Transport stakeholders including users, providers and manufacturers, will adjust the way they build, own and operate vehicles in response to these evolving regulations or costs, such as the evolution of hydrogen fuelled vehicles (Hinchliffe, 2019) and electric vehicle (EV) technology. It is important to note that these alternative fuels are alone unlikely to change parking practices but will do so when used in combination with autonomous and connected technologies.
- *Demographics* – Approximately 15% of Australians (3.8 million) are aged 65 and over and this proportion is projected to grow steadily over the coming decades (Australian Institute of Health and Welfare, 2018). This means that more and more Australians will have assisted mobility needs which is likely to increase the demand for on-demand transport services such as Uber. Furthermore, younger generations are increasingly comfortable using technology, not only to find information in real-time, purchase goods and communicate but increasingly to use shared services such as rideshare, and participate in a distributed workforce.
- *Development and adoption of technology* – Advances in technology which are influencing car use and broader transport systems include cashless transactions, mobile phone use, data collection and processing, and wireless connectivity. These technologies enable the mass rollout of rideshare services, on-demand services, rapid payment (machine to machine capabilities), and electric, autonomous and connected vehicles. Changing trends in technology provide management authorities with two key areas of opportunity: (1) use of technology to optimise existing parking supplies; and (2) understanding travel and parking behaviour. For instance, technology has enabled the rapid growth of food delivery services, which may reduce the demand for on-site parking at fast food outlets and restaurants. The collection of customer travel preference data can be used to inform activity centre parking requirements. The influence of technology on parking demand is discussed further in Section 6: Autonomous Vehicles, Rideshare and Car Parking.
- *Liberalisation of parking requirements* – Public authorities are beginning to relax minimum parking requirements, or even eliminate them altogether, in many cities around the world (Sipe, et al., 2019). These changes are being made in response to a growing recognition of the substantial direct and indirect costs associated with traditional approaches to parking provision through minimum parking requirements (Shoup, 2018).

These trends indicate that the demand for car parking is likely to plateau and even decrease in the foreseeable future, providing opportunities for management authorities to consider strategies and policy options which facilitate more efficient use of urban land and development capital to create healthier and more vibrant people friendly communities.

## 2.5 Current Legislation, Policy and Guidance

Local Governments are granted powers to use statutory and non-statutory means to influence parking provision and management through Western Australia's legislative and policy framework. The relevant legislation and policies include:

- *Planning and Development Act 2005* – Section 69 and Schedule 7 allows Local Governments to include new development requirements, including parking provision, in local planning schemes and local planning policies.
- *Local Government Act 1995* – Section 3.5 allows Local Governments to make and enforce on-street parking local laws.
- *State Planning Policy 7.3 Residential Design Codes Volume 1* – Part 5 outlines the design principles for residential parking and the deemed-to-comply minimum quantity of parking spaces to be provided by new types of residential development.
- *State Planning Policy 7.3 Residential Design Codes Volume 2* – Section 3.9 provides objectives, acceptable outcomes and design guidance for parking in new apartment developments.

A number of car parking guidance documents are also available to help guide Local Government's car parking provision and management. These include:

- *Austrroads Guide to Traffic Management Part 11 (Parking)* – This guide deals with parking policy, supply and demand, data and surveys, on- and off-street parking and parking control. Austrroads is a consortium of road and traffic agencies which provides guidance on design, construction and management of roads to its members.
- A range of parking guidelines published by the Department of Transport which cover large developments such as activity centres, shopping centres and tertiary institutions.

These documents provide important provisions and guidance to Local Governments.

## 2.6 Principles of Policymaking

When formulating and adopting public policy, Local Governments should consider the extent to which various policy options align with well-founded principles of policymaking. These principles include:

- *Fairness and Equity* – Policies should treat all landholders and residents impartially. For instance, the provision of on-street parking for motor vehicle users may disadvantage other user groups who have an interest in accessing that public space for other purposes, such as cycling, walking, al fresco dining or parklets<sup>3</sup>.

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<sup>3</sup> A parklet is a former car parking space which has been turned into a small park. For example, see (Thorpe, 2017) available [here](#) or (Thorpe, 2016) available [here](#).

- *Effectiveness / Impact* – Policies should make an effective, safe and positive impact and demonstrate a net community benefit which influences positive community change. This may include facilitating approaches which enable the highest and best use of land. Management authorities can choose from a range of indicators for measuring the effectiveness or otherwise of parking management policies. These indicators include: parking space occupancy rates, usually 85% at any one time; mode share and decreases in car-use; local business revenue; commercial and retail vacancies; pedestrian activity; crash rates; parking fines; and, speeding fines.
- *Affordability* – Policies should represent value for money both now and in the future, and use resources responsibly.
- *Adaptability* – Policies need to be adaptable to change over time, to respond to changing consumer demands, technologies and community priorities.
- *Process Efficiency* – Policy options should attempt to avoid introducing unnecessary or cumbersome controls or requirements which make usage or regulation more complex.
- *Community Aspiration* – Policy options should align with the shared hopes that residents have for the future of their community. These shared hopes may vary substantially from neighbourhood to neighbourhood.

This document discusses the extent to which potential policy options align with these principles, with the exception of the principle “community aspiration”. Community aspiration is highly locational dependent and therefore, will vary from community to community. Consequently, discussion on the extent to which a certain policy option is likely to align with the aspiration of a local community is not discussed in this Discussion Paper. Nevertheless, community aspiration is a critical component for Local Governments to consider when contemplating changes to parking policies.

## 2.7 Incremental Approach to Parking Management Reform

Car based mobility plays an important role in supporting commercial activity and facilitating access to work, education and recreation and has played an important role in the economic development of Western Australia. However, car based mobility has entrenched a culture of motor vehicle dependence, ownership and usage, and expectations of access to car parking, often free of charge (Taylor, 2014). These expectations can make any contemplation of alternative approaches to parking management politically unpopular and controversial, and can also lead to management decisions which may not be considered appropriate from an analytical or economic perspective.

Changes to parking policy may be more palatable and help ensure a smoother transition if implemented incrementally. An incremental approach allows a community time to adjust to small changes in car and parking access, as opposed to introducing sudden, substantial changes. An incremental approach also allows Local Governments time to measure and evaluate if parking management objectives are being realised prior to broader rollout or trialling alternative approaches.

An example of an incremental approach may include:

1. First Phase Parking Management, includes collection and evaluation of data such as occupancy rates and mode share, to examine perceived parking issues and determine specific parking demand in a locality, establish parking objectives, promote benefits of parking management, and introduce options such as time limits and enforcement of public on-street parking space.
2. Second Phase Parking Management, may include further collection and evaluation of data to determine the effectiveness of implemented options, refine and modify options, and consider next steps such as paid parking, enforcement of on- and off-street parking, and expenditure of parking revenue on alternative transport modes and streetscape improvements.
3. Third Phase Parking Management, may include optimising the use of existing off-street parking by encouraging reciprocal parking arrangements, using technology to guide users to vacant parking spaces, and refining new development parking requirements.

More information on incremental approaches will be provided in the Local Government Car Parking Guideline.

## 2.8 Discussion Questions

- a) Are there other key considerations and policymaking principles that Local Government should keep in mind when reviewing car parking policies, which should be emphasised in this section? Note: more detail regarding on-street and off-street parking approaches is provided in the following sections.
- b) Has your Local Government used formal processes to involve the community in identifying how public street space should be used and prioritised, including for parking?

(Provide answers here)

### 3. Supply and Management of Private (Off-street) Parking

Generally, planning authorities aim to ensure that the demand for parking generated by new development is met by mandating private off-street parking requirements in local planning frameworks. These parking requirements are often applied by enforcing minimum car parking ratios for different land uses. For example, a Local Government may require new shops to provide one new parking bay for every 20m<sup>2</sup> of the shop's net lettable area, new offices may be required to provide one new parking bay for every 40m<sup>2</sup> of the office's net lettable area and new residential buildings may require one bay for every two persons a building is designed to accommodate. By requiring new development to provide off-street parking space, these ratios aim to contain parking generated by a new development on private land, to reduce demand for parking in public spaces.

Private off-street parking facilities may be indoor or outdoor, are commonly owned and operated by private landholders, and are usually provided for the exclusive use of new development users such as residents of a dwelling or in the case of commercial development, for the use of staff, customers and service vehicles. Off-street private parking can also accommodate reciprocal and shared parking arrangements, where parking spaces are utilised by users who access a number of nearby businesses, apartments or other facilities.

Parking ratios have usually been informed by a patchwork of sources such as ratios applied by neighbouring authorities or standards recommended in other states and countries (Cardno, 2018) (Shoup 2015). Consequently, minimum parking ratios may be poorly related to parking demand generated by individual developments and inconsiderate of local context. Consequently, the application of minimum parking ratios may undermine a community's ability to meet environmental, economic or social objectives such as reducing traffic congestion in activity centres, improving the amenity and vibrancy of activity centres, enabling changes of use, or encouraging active transport choices such as walking and cycling (Cardno, 2018) (Buehler, et al., 2017). These issues raise concerns about the way in which off-street private parking requirements are identified, mandated and administered.<sup>4</sup> These and other issues associated with the regulation and management of off-street private parking are discussed in this section.

This section is mostly relevant to non-residential land uses given that parking requirements for residential uses are generally controlled by *State Planning Policy 7.3: Residential design codes*.

#### 3.1 Issue: Minimum Parking Requirements cause Parking Oversupply

Minimum parking ratios originate from predictions of demand for parking generated by new development at peak periods, assuming no parking charges that would moderate demand (Cardno, 2018) (Shoup, 1999). Consequently, requiring proponents of new development to provide parking space which meets peak period demand is likely to lead to an oversupply of parking during all other (non-peak) periods. There are numerous issues with this approach, including:

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<sup>4</sup> For a more detailed discussion on the history of parking ratios see Cardno (2018), Shoup 2019 and Shoup 2018.

- Induced demand for parking and use of vehicles, which can cause traffic congestion and increased air and noise pollution.
- Increased development costs, business operating costs and reduced housing affordability due to the high costs of construction, maintenance and a general expectation that parking is free or low-cost which limits opportunities for recovering costs. As an example, multi-storey parking bays can cost up to \$50,000 each to construct (City of Canning, 2019).
- Impede infill development, particularly on small lots and redevelopment of older buildings, where space may constrain the ability of the landholder to meet revised parking requirements (Shoup, 2015).
- Allocation of land and materials to provide a potentially unnecessary service, resulting in the inefficient use of land and materials, and property tax opportunity costs (Yu, 2014).
- Reduced ability to consider a development application on individual merits in respect to location, hours of operation, staffing, and shared parking potential.
- Requiring each individual business to provide parking is not reflective of a precinct user's tendency to park once and walk to other services.
- Large car parks which are a significant barrier to good urban design and vibrancy, as they create large inactive and visually unappealing spaces between buildings. This effect can be exacerbated during relatively quiet periods, when the car park may be empty.

As urban populations grow and the demand for private and public space in urban areas increases, this approach to parking provision is likely to become increasingly inadequate. A range of alternative policy options exist.

### 3.1.1 Policy Option: Discounts and Concessions

Discounts and concessions to minimum parking requirements can be a viable method for minimising the potential to oversupply parking and help facilitate development in existing urban areas. Discounts and concessions might be offered in activity centres or on sites which meet certain criteria, such as where sites are located close to high frequency public transport.

Currently, discounted rates for parking are provided for residential land uses under Part 5 of *State Planning Policy 7.3: Residential Design Codes Volume 1 (R-Codes)*, where these uses are located within: (1) 800m of a train station on a high frequency rail route; or (2) 250m of a high frequency bus route. Similar concessions can be applied for non-residential uses such as shops, showrooms, offices and light industry.

This option would require a set of criteria to help guide an authority who may be considering potential discounts and concessions. Establishing consistent criteria would align with planning reform actions recently proposed by the State Government (Department of Planning Lands and Heritage, 2019, p. 18). These criteria may include: constraints of the development site; capacity of the road network; proximity to public and active transport networks; proximity to public parking infrastructure; direct impact on the existing on-street parking supply; and cumulative impact on the broader activity centre's parking supply. The City of Stirling allows discounts to minimum

parking requirements for non-residential developments using a set of performance criteria outlined in a local planning policy (City of Stirling, 2019).<sup>5</sup>

In order to facilitate discounts and concessions, management authorities might allow development proponents the option of preparing a travel plan, to demonstrate how travel demands generated by new development can be met through approaches alternate to car travel and parking (City of Melville, 2016). These methods may include travel behaviour change programs, which have been used successfully in Western Australia to facilitate mode shift (Petrunoff, et al., 2015). Management authorities can ensure implementation of and compliance with these plans by requiring the plan as a condition of development.

#### Advantages

- ✓ Relatively straightforward to implement with minimal change, within an existing planning framework.
- ✓ Encourages development and improves access to affordable housing by reducing development costs.
- ✓ Enables higher quality streetscapes and urban design by maximising lot space for other facilities.
- ✓ May be used by Local Governments to negotiate for other desired development outcomes.
- ✓ Promotes a healthy and active community by encouraging shifts to public and active transport modes.
- ✓ Promotes fairness, equity and affordability for residents who choose not to own vehicles, or may not be able to afford vehicles, and instead use public or active transportation.

#### Limitations

- Requires authorities to exercise greater discretion and administration, which may inhibit process efficiency until normalised.
- Precinct-wide on-street parking management may be needed to address potential overspill issues.

### **3.1.2 Policy Option: Reciprocal Parking Arrangements**

Reciprocal parking arrangements provide opportunities for users of different but nearby land uses, who operate at different times, to share all or some of the parking provided on site. For example, reciprocal arrangements may occur between an office and a small restaurant, where office workers use parking during the day and restaurant users access the same space in the evening.

Reciprocal arrangements are drafted between the relevant parties and lodged at the time of submitting a development application. Details of the arrangement commonly include parking capacity, usage times, and other relevant considerations.

Reciprocal parking provisions are currently in use in the City of Stirling (City of Stirling, 2019) and the City of Melville (City of Melville, 2016), among others.

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<sup>5</sup> See also (Town of Cambridge, 2019, p. 7).

## Advantages

- Optimises utilisation of existing bays.
- More affordable for landholders to operate and maintain, as maintenance costs are shared between landholders.
- Enables more efficient use of urban land, particularly where arrangements are made to share multi-storey facilities, and is likely to help decrease development costs and improve the appearance of streetscapes.

## Limitations

- Requires authorities to exercise greater discretion and administration, to ensure conditions can be and are being complied with.
- Reciprocal arrangements may become redundant where user operating hours and businesses or land use change or agreements expire.

### 3.1.3 Policy Option: Parking Maximums

Parking maximums can be used by authorities to set a cap on the supply of parking, usually in precincts with access to public transport, so that the maximum quantum and type of parking within the area does not exceed the planned road network capacity (Department of Transport (WA), 2016).

Maximums are commonly applied using two approaches: (1) setting a maximum supply limit for an entire precinct; or (2) setting supply limits on various land uses within precincts. Where maximums are introduced, minimum requirements are usually removed. In areas where parking maximums are applied, the effective management of public parking becomes critical for preventing potentially detrimental effects caused by parking overspill. The State Government encourages the use of parking maximums in activity centres (Western Australian Planning Commission, 2019) and some Local Governments in Western Australia have applied parking maximums to residential dwellings in certain areas, as a variation to the residential design codes (City of Fremantle, 2019).

While management authorities in other states have observed that determining parking requirements for individual precincts can be complex, costly and time consuming (Planning Panels Victoria, 2012), numerous benefits can be achieved. For instance, establishing parking maximums in the City of Perth has been correlated with a reduction in parking use and increased public transport trips to and from the City centre. This may be due to car users recognising that parking may not be readily available and therefore, seek alternative modes to reach their destination. A recent survey of 2200 public transport users in Perth observed that the majority of survey participants indicated that limited or expensive parking is the predominant motivating factor in their choice to access and use public transport (Government of Western Australia, 2019). Studies in other Australian cities and internationally have also observed strong correlations between destination parking availability and commuter mode choice (Pandhe & March, 2012) (Christiansen, et al., 2017).

Maximum parking requirements have also been applied in Perth CBD, Auckland, Melbourne, at the Bentley-Curtin Specialised Activity Centre and by the City of Vincent (for mixed use development).

#### Advantages

- ✓ Promotes a healthy and active community by encouraging shifts to public and active transport modes.
- ✓ Reduces congestion, pollution and the need for large investments in road capacity.
- ✓ Enables higher quality streetscapes and urban design by maximising lot space for other facilities.
- ✓ Promotes fairness, equity and affordability for residents who choose not to own vehicles, or may not be able to afford vehicles, and instead use public or active transportation.
- ✓ May help authorities achieve process efficiencies, by simplifying planning requirements.

#### Limitations

- Resources needed to identify appropriate maximums. It may be difficult to develop a method for determining the most appropriate maximum number of bays, as is the case with parking minimums.
- The highest and best use of land in a particular area may require a higher level of parking provision than allowed under the parking caps, potentially hampering economic development in that area.
- Not compatible with cash-in-lieu. Minimum requirements would still be needed (Cardno, 2018).

### **3.1.4 Policy Option: Reduced or Deregulated Parking Requirements**

Reducing minimum parking requirements, or eliminating them all together, transfers the decision for private off-street parking supply to development proponents, based on cost and perceptions of their customers' needs and desires.

Minimum parking requirements are not used in many parts of the world and are generally less stringent in the CBD areas of Australian cities (Cardno, 2018). As an example, the City of London recently established parking maximums and removed parking minimums. Following these reforms, it was observed that parking supplied by new development was 68% of the new maximum requirement and 52% of the previous minimum requirement. It was estimated that "removing the parking minimum caused 98% of the reduction in parking spaces, while imposing the maximum caused only 2% of the reduction" (Shoup, 2015, p. 29). These outcomes imply that: (1) the parking minimums required almost twice the number of parking spaces that development proponents would provide; and (2) parking maximums may be of limited value in particular circumstances.

#### Advantages

- ✓ Quantity of parking supplied is more likely to reflect parking demand and cost and therefore, removes the risk of parking requirements thwarting otherwise viable development.

- ✓ Allows for more economical use of land by increasing space for the building envelope or for uses other than parking.
- ✓ Higher revenue from land tax and council rates, due to land being developed more intensively.
- ✓ Likely to result in only a minimal and gradual overspill effect, as existing nearby developments will continue to provide on-site parking after parking minimums are removed (Barter, 2019).

#### Limitations

- May substantially reduce private off-street parking supply and therefore, increase demand for public on-street or off-street parking, necessitating management.
- Real or perceived risk to local businesses of a reduction in customer access to the site. This may lead to demands for Local Governments to construct expensive public off-street parking.
- Loss of parking requirements as an indirect means to limit development intensity.
- Where this policy option is applied in residential areas, the contribution to transport mode shift may be limited without supportive measures such as good access to public transport and decreases in nearby public parking supply (Antonson, et al., 2017).

#### 3.1.5 Policy Option: Unbundling

Unbundled car parking is an approach used to exclude some or all parking spaces from the strata title of a property. The parking space is managed as a common property and sold or leased separately rather than included for the exclusive use of one particular property. Parking is then sold or rented in a separate market allowing users to choose to own or rent less or more parking. Parking spaces are either optional at initial purchase, or building managers or owners can rent spaces separately (Taylor & Clements, 2018). The body corporate retains oversight of all car bays as common property.

Developers are currently required to provide ample parking as a condition of development approval. Unbundling parking together with managed street parking allows minimum parking ratios to be removed. Reducing or removing these parking ratios may prompt developers to unbundle on their own accord, although evidence suggests that the market for bundled parking in residential development in Western Australia, even on sites that are within walking distance to public transport and shopping precincts, remains strong (Young 2019).

Implementation examples in Western Australia are not known; however, the new *Strata Titles Amendment Act 2018* (WA) is likely to help facilitate this approach.

#### Advantages

- ✓ May help to reduce car ownership and use (Taylor & Clements, 2018).
- ✓ Promotes a healthy and active community by facilitating shifts to public and active transport.
- ✓ May improve streetscape amenity by reducing the number of visually intrusive and inactivated parking structures.

- ✓ Promotes fairness, equity and affordability for users who choose not to own or use vehicles, or may not be able to afford vehicles, and instead use public or active transportation.
- ✓ Helps to ensure that the true cost of car storage is transparent.
- ✓ The fragmentation of space caused by bundling is likely to be an impediment to the potential transfer and aggregation of unused parking spaces to alternative uses such as community garden, storage or recreation space, therefore, unbundling may improve the speed and ease with which space can be re-purposed in the future.

#### Limitations

- Unlikely to actually reduce parking over-supply where minimum parking ratios remain in force, as developers will be obliged to build ample parking spaces as a condition of development approval.
- Requires authorities to exercise greater discretion which may inhibit process efficiency until normalised.
- Requires strata managers to manage unbundled bays as a part of common property.
- On-street parking management may be needed to address potential overspill issues.

Property purchasers may perceive parking as important to property value and therefore, development proponents may be hesitant to support this option (Stubbs, 2002).

#### 3.1.6 Other Policy Options

**Car Share Schemes** - By providing on- or off-street parking space for car sharing operators, or requiring the provision of these spaces through development control, management authorities can help facilitate car sharing programs and in turn, reduce the demand for car ownership and on- and off-street parking space. For example, in New South Wales, Leichardt Council's local planning framework "specifies that one car sharing space can be provided in lieu of five private car parking spaces" (Kent & Dowling, 2016, p. 265).

Car sharing operators generally request the free use of parking space to achieve financial viability. These subsidies can raise issues of fairness and equity, given that the allocation of on-street car share bays could be considered as the privatisation of public space and may favour some operators over others if parking spaces are not provided to all operators (Department of Transport, 2016). Allocating on-street parking space to car sharing may also raise angst with local residents and business owners, due to reduced parking -for staff and customers; however, allocating car sharing spaces in off-street car parks, adjacent to public land or requiring new development to locate them on-site may help alleviate these concerns (Kent & Dowling, 2016). The alternative view point, evidenced with learnings from the City of Sydney, is that car share operations result in less overall car use and ownership, so drivers who choose not to use the car share service still benefit from the reduction in competition for road space and parking (Phillip Boyle and Associates, 2016). Finally, viable car sharing schemes generally require denser urban environments due to the need for high vehicle utilisation to achieve profitability (Martin, 2017) (RAC, 2015).

**Car Stackers** – Car stackers are an emerging design response which may be presented as part of a proponent's proposal for addressing parking shortfalls. Management authorities should be aware of a number of considerations when considering such proposals, in particular the capacity

of the stacker to accommodate all vehicles accessing the development and the relevant safety standard outlined in AS5124:2017.

## 3.2 Issue 2: Managing Redevelopment or Changes of Use

Minimum parking requirements can inhibit the redevelopment of small lots and existing buildings, where space may constrain the ability of the landholder to meet parking requirements which are relevant to the new development or use (Shoup, 2015). This situation is likely to constrain change of use in heritage areas developed before the advent of these requirements. Consequently, minimum parking requirements can limit the potential for communities to improve the vibrancy of precincts and facilitate changes of use on existing sites. These challenges may be exacerbated in industrial precincts, where space for on-street parking and alternative transport modes may be limited. The State Government recently raised the limitations of parking requirements on changes of use as an issue which needs to be resolved through recent planning reform discussions (Department of Planning Lands and Heritage, 2019, p. 18). Furthermore, Local Governments have indicated that the majority of time spent processing applications for change of use and non-residential redevelopment is often spent on assessing car parking requirements.

A range of options are available to help authorities address these issues. These policy options are mostly provided in Section 3.1, including: discounts and concessions; reciprocal parking arrangements; parking maximums; and, reduced or deregulated parking requirements. Grouping land uses permitted in a scheme into categories with similar parking requirements, then applying a parking rate to each category may also be an effective policy option, discussed in Section 3.3.1. Two additional options which may help authorities address this issue include: exemptions from the requirement to seek planning approval for changes to parking requirements; and, cash-in-lieu of parking.

### 3.2.1 Policy Option: Exemptions

Management authorities may consider allowing exemptions from the need to seek planning approval, where new proposals do not substantially increase the number of parking spaces required by the new use and would otherwise not trigger the need to seek planning approval. This approach has been applied in the City of Stirling, City of Fremantle and in Victoria (Government of Victoria, 2018) using the following criteria:

- The building is located in a commercial or activity centre zone
- The gross floor area of the building is not increased
- The reduction does not exceed 10 car parking spaces, and
- The building is not located within an area under the administration of an existing cash-in-lieu scheme.

#### Advantages

- ✓ Removes the risk of parking requirements thwarting otherwise viable developments.
- ✓ Potentially increased demand for public transport and improved vibrancy of precincts.
- ✓ Enables higher quality streetscapes and urban design by maximising lot space for other facilities.

- ✓ Promotes a healthy and active community by facilitating shifts to public and active transport modes.
- ✓ May help authorities achieve process efficiencies, by simplifying planning requirements.

#### Limitations

- May increase demand for offsite parking and on-street parking management.
- May raise questions of equity and fairness to nearby landholders who, in the past, may have been required to meet minimum parking requirements.
- May lead to unintended consequences in terms of land use mix in a precinct, resulting in parking supply issues.

### 3.2.2 Policy Option: Cash-in-lieu

Cash-lieu provisions allow management authorities to require a payment from development proponents in return for modifying the parking requirement, to compensate for the shortfall in the number of parking spaces provided. The revenue received is usually directed to the construction of off-street public parking but can be spent on parking demand reduction approaches such as active and public transport projects, depending on planning scheme provisions.

Cash-in-lieu is considered to be an important, reasonable and valid approach for resourcing shared car parking projects or alternative transport modes, where parking demand cannot be met on site (Planning Panels Victoria, 2012). However, criticism of cash-in-lieu schemes is not uncommon and is usually directed at inconsistent methods used to calculate cash-in-lieu, poor accountability of funds (Department of Planning Lands and Heritage, 2019) (Planning Panels Victoria, 2012) and the absence of a clear strategy for how funds are to be used. Local policies may help to ensure consistent application within jurisdictions and in-turn, limit exposure to these criticisms by outlining calculation methods, criteria for allowing discounts and indicating how funds will be spent. Cash-in-lieu policies are commonly applied by Local Governments across Western Australia (City of Stirling, 2019) (City of Bayswater, 2016).

Cash-in-lieu contributions are often calculated by adding the cost of land for a parking space with the additional cost of constructing a parking facility and multiplying that cost by the number of spaces to be provided. A community benefit reduction factor may also be applied which reduces the contribution amount where community benefits are likely to be derived from the new development or expenditure of the contribution (City of Canning, 2019) (City of Melville, 2016). Contributions from a particular area should be expended on providing community benefits within the same geographic area, to align with need and nexus principles. Fixing the cash-in-lieu amount for a particular activity centre, with indexed increases, can provide certainty to proponents and may be more efficient to administer.

#### Advantages

- ✓ Provides flexibility for development proponents while facilitating parking demand and access.
- ✓ Utilise land which may not be useful for purposes other than car parking or similar non-sensitive land uses.

- ✓ Potentially reduces the risk of parking requirements thwarting otherwise viable developments, where discounts are applied (e.g. benefit reduction factors).
- ✓ Enables higher quality streetscapes where funds are spent on public realm improvements or the construction of large at-grade car parks are avoided.
- ✓ Enables maximisation of lot space for other facilities.
- ✓ Promotes a healthy and active community by facilitating shifts to public and active transport modes, where cash in lieu is used to resource public and active transport modes.
- ✓ Enables communities to benefit from economies of scale, by pooling resources to construct, maintain and manage parking facilities.

#### Limitations

- This option requires management authorities to stipulate minimum parking requirements. However, minimum parking requirements are often not reflective of development generated parking demand (Cardno, 2018) and therefore, using minimum parking requirements to substantiate cash-in-lieu requirements may be a precarious management strategy.
- Cumbersome administrative requirements, particularly where calculation methods are complex and ambiguous.
- The costs of meeting parking requirements which are poorly related to generated demand can be prohibitive to development, especially for changes of use and small business, and may prevent new development from locating in existing precincts and infill areas.
- Likely to be viewed suspiciously by landholders, particularly where there is no clear strategy outlining how funds will be invested to address parking and transport demands generated by new development.
- Without discounts, there may be limited if any incentive for development proponents to pay cash in lieu, limiting the effectiveness of this policy to reduce excessive parking provision.
- Parking construction can occur sometime following cash in lieu payment. Therefore, construction costs are often greater than the cash-in-lieu fees charged and collected, potentially burdening communities with either financial shortfalls or less parking.

### 3.3 Issue 3: Assessment Complexities

Local Governments have indicated that the assessment of parking requirements can be a complex exercise. For instance, in many jurisdictions, Local Governments have established different minimum requirements for each different land use (Cardno, 2018), which can complicate development assessment. Development proponents have indicated that understanding the varying local parking requirements within and across Local Government jurisdictions can be challenging.

While the setting of parking requirements is necessarily a local exercise which should reflect local variations in density, access to public and active transport, and land use, options do exist for helping management authorities reduce assessment complexities. For example, Local Governments can use statutory and non-statutory approaches to control and influence parking provision and management, such as local planning schemes or local planning policies. There are

advantages and disadvantages associated with each approach, as discussed in the following sections.

### 3.3.1 Policy Option: Group Land Uses

Land uses which generate similar car parking demands have the potential to be grouped into similar land uses to help rationalise the number of land use classes and simplify administrative requirements. This option can also help to simplify the assessment of changes in land use (Planning Panels Victoria, 2012), discussed in Section 4.3.

Grouping land uses into categories with similar parking requirements and standardising parking requirements across these uses, would align with planning reform actions recently proposed by the State Government (Department of Planning Lands and Heritage, 2019, p. 17). Grouped land use categories might include: commercial; shopping; industry; entertainment; dining; and district or local centre. For example, the City of Stirling applies standardised minimum parking requirements for non-residential uses in local and neighbourhood centres (City of Stirling, 2019).

Management authorities proposing to adopt standard parking requirements across land uses need to be considerate of differing needs between communities which are well serviced by public and active transport networks and those which have a higher dependency on cars.<sup>6</sup>

#### Advantages

- ✓ Helps to reduce potentially unnecessary regulation, simplifying assessment.
- ✓ Likely to simplify change-of-use applications.

#### Limitations

- May create advantages for some landholders, limiting equity and fairness for other landholders.
- Creates a one size fits all parking requirement for groups of different land uses, potentially exacerbating some of the problems inherent in applying minimums.
- Does not substantially address problems associated with minimum parking requirements.

### 3.3.2 Policy Option: Provision through Local Planning Scheme

Most Local Governments stipulate parking requirements for different land uses in their local planning schemes. The advantage of statutory requirements is that they can be relatively easy to enforce. One of the key disadvantages with this approach is the relative inflexibility of statutory mechanisms, offering limited scope for variation from the required standards. However, deviation from these requirements may be allowed at the discretion of the Local Government where specific provisions are provided within the scheme.

### 3.3.3 Policy Option: Provision through Local Planning Policy

Local Government can also use local planning policies to outline parking requirements. This approach generally offers flexibility for development proponents to provide parking for new

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<sup>6</sup> For example, clause 52.06-5 of the *Victoria Planning Provisions* provides two sets of standardised parking requirements for different land uses, which allow for locational variances according to access to public transport networks, available [here](#).

development through alternative approaches. These approaches may include a combination of on-site parking, reciprocal parking arrangements with nearby landholders, rideshare facilities and contributions toward active transport infrastructure.

### 3.4 Discussion Questions

- a) Do you experience these parking issues in your Local Government area?
- b) Which policy options have been implemented by your Local Government and which have been effective or ineffective? Are there particular reasons why?
- c) Which policy options have not been implemented but might be useful in your Local Government area? Are there specific reasons for non-implementation?
- d) Are there useful policy options that have not been discussed in this section?
- e) Has your Local Government used cash-in-lieu payments to construct off-site public parking or invest in parking demand-reduction such as active and public transport? Has this been effective?
- f) Does your Local Government support reciprocal parking? If so, are these arrangements enforced through a condition of development approval or through less formal means?
- g) Have decisions by Development Assessment Panels affected parking in precinct areas? If so, has your Local Government modified its planning framework in response to these decisions?
- h) Do you have an example of a policy option discussed in this paper which has led to positive or negative outcomes and would be a valuable case study to share with other Local Governments?
- i) Do you have a consistent and effective approach for facilitating change of uses in industrial estates where parking provision is a major constraint for applicants?

(Provide answers here)