

7.1.2 MODERNISING PLANNING INITIATIVES - DEPARTMENT OF TRANSPORT AND PLANNING

Responsible Manager:	Sean McNamee, Manager Strategic Planning
Responsible Director:	Peter Panagakos, Director City Development

RECOMMENDATION

That Council notes the report and the written submissions made by Officers to the discussion papers from the Department of Transport and Planning relating to proposed changes to advertising signs, small lot residential development and car parking and bicycle parking requirements.

INTRODUCTION

This report outlines the recent planning review discussion papers drafted by the Department of Transport and Planning (DTP) to sections operational provisions of the Victoria Planning Provisions, specifically related to:

- advertising signs,
- small lot residential development; and
- car parking and bicycle parking requirements.

These three discussion papers were released for limited comment and feedback with a very limited timeframe for response Officers have provided feedback on these initiatives and this report outlines the key aspects of those submissions.

COUNCIL PLAN STRATEGIC OBJECTIVES

Enhanced Places

Pursue a planning framework that meets Monash needs.

BACKGROUND

The State Government has an ongoing program of review to monitor and update the planning system and the Victoria Planning Provisions in particular. With this round of discussion papers, DTP are proposing a range of changes in planning scheme provisions relating to advertising signs, residential development on small lots, and car and bicycle parking requirements.

The proposed changes outlined in the discussion paper on car and bicycle parking provisions represents the greatest potential change to car parking provision and assessment for a number of years.

DISCUSSION

The three discussion papers each outline issues to be addressed and proposed changes to the Victoria Planning Provisions which would then change planning schemes across Victoria. Feedback has been sought from Councils although a broader public consultation has not been undertaken.

Modernising Sign Requirements – Discussion Paper

DTP is proposing changes to some of the planning requirements for signs at Clause 52.05 of planning schemes, which predominantly manage visual amenity and road safety impacts of signs.

Several of the changes relate to increasing the range and scope of real estate signage on sites including allowing real estate signs to be displayed for 21 days after the sale or letting of a property without a planning – an extension to the current 7 day permit free period.

It is unclear from the discussion paper why this would be required and how this is “modernising sign requirements” given the dominance of online real estate platforms in the sale process of property.

Concerns have been raised about the additional visual clutter created by this and other proposed changes in the discussion paper.

A copy of the Officers’ submission is included as **Attachment 1**.

Improving Residential Standards for Small Lots – Discussion Paper

This discussion paper proposes changes to siting and amenity standards of Clauses 54 and 55 of planning schemes for dwellings on small lots of less than 300 square metres. The proposed changes relate to street setbacks, site coverage, and walls on boundaries.

The discussion paper incorrectly assumes that small lots are predominantly located in the inner urban areas of Melbourne, and the proposed changes reflect that view and urban context. In fact, there are many small lots in suburban Melbourne, including in Monash, that have been created as a result of subdivision, that would potentially be subject to the changes proposed.

Whilst some of the proposed changes are minor, they are based on the premise that a small lot requires exemption from siting and site coverage in order to be developed for a dwelling. (rather than accepting that a small lot will contain a small dwelling). This results in the creation a special category for small lots that is unlikely to result in development on small lots achieving the objective of more clearly defining acceptable design responses for small lots in an urban context.

Ultimately, it is likely that these changes will create negative amenity consequences for neighbouring properties and the streetscape.

The discussion paper also proposes to increase the site coverage for small lots and increase the height of walls on boundaries an additional 200mm. These changes are unlikely to result in improved design outcomes.

A copy of the Officers' submission is included as **Attachment 2**.

Modernising Car and Bicycle Parking Requirements Discussion Paper

The proposed changes outlined in this discussion paper introduce the greatest changes to the assessment of car and bicycle parking for many years.

The discussion paper proposed a fundamental change in approach by replacing the existing specified parking rates, with a variable car parking requirement based on a Public Transport Accessibility Levels matrix assessment (PTAL). It also proposes to introduce new land use groups based on empirical car parking demand, and updated car parking rates based on PTAL and these land use groups.

Whilst there may be merit in assessing car parking in the overall context of transport options available and the draft PTAL formula provide for this, there is a lack of direction around the weightings proposed for access to alternative transport and there are inherent assumptions in travel patterns and service frequency and undermine the validity of the proposed approach.

The car parking rates proposed include both minimum and maximum rates. Officers have expressed some concern over removing minimum car parking rates in areas with medium or high PTAL scores, as some of the maximum rates proposed could be too low and would require a planning permit for greater levels of parking.

The proposal also includes increased bicycle parking rates and end-of-trip facilities based around PTAL and land use groups, and the consolidation of car and bicycle parking requirements in the VPP. It is not considered appropriate however to link the bicycle parking rates to PTAL as there is no demonstrated link between public transport access and bicycle parking demand.

Further consultation on the proposed use of the PTAL system would be required to fully understand the concept and ensure that assumptions are tested before any changes are adopted.

A copy of the Officers' submission is included as **Attachment 3**.

FINANCIAL IMPLICATIONS

There are no financial implications to this report.

POLICY IMPLICATIONS

If any of the changes proposed in the DTP discussion papers, particularly those related to car and bicycle parking, are implemented there may be a need to review Council's approach to parking provision through the Monash Planning Scheme and related policies and strategies.

CONSULTATION

Community consultation was not required.

SOCIAL IMPLICATIONS

There are no social implications to this report.

HUMAN RIGHTS CONSIDERATIONS

There are no human rights implications to this report.

GENDER IMPACT ASSESSMENT

A GIA was not completed because this agenda item is not a 'policy', 'program' or 'service'.

CONCLUSION

This report is for noting.

ATTACHMENT LIST

1. Letter to DTP Modernising Sign Requirements DP [**7.1.2.1** - 3 pages]
2. Letter to DTP Small Lots DP [**7.1.2.2** - 3 pages]
3. Letter to DTP Modernising Car Bicycle Parking DP [**7.1.2.3** - 7 pages]



F22-27284

24 November 2023

Mr Phil Burn
Director Planning Systems Reform
Department of Transport and Planning
PO Box 500
EAST MELBOURNE VIC 8002

Sent via email: planning.systems@delwp.vic.gov.au

Dear Mr Burn,

DISCUSSION PAPER – MODERNISING SIGN REQUIREMENTS – August 2023

Thank you for the opportunity to provide feedback on the Modernising Sign Requirements Discussion Paper. Undertaking stakeholder engagement at the conceptual stage of a reform is worthwhile and encouraged, particularly reforms that seek to make fundamental changes to the planning system in Victoria.

Please note that due to time constraints this submission is an officer view submission only.

Changes to real estate agent signs.

I note that several of the changes contained in the “modernising sign requirements” relate to increasing the range and scope of real estate signage on sites. It would be useful to understand the background to the need for these changes given the dominance of online real estate platforms in the sale process of property.

Since the widespread take up of platforms such as Realestate.com.au the “house hunting” process is carried out online. This essentially relegates the real estate signage board to identifying the property in the street as “For Sale” or “For Lease”, and of course promoting the selling agent to the neighbourhood.

Expanding the range and extending the duration of physical real estate signs on site in the digital age cannot be correctly identified as “modernising signage”.

Proposal 1: Allow multiple real estate signs to be displayed on certain lots without a planning permit

Aside from the general concern express above we have no issue with this proposed change for multi frontage properties.

Proposal 2: Allow electronic real estate signs to be displayed without a planning permit

As discussed above, with dominance of online real estate advertising it is unclear how the present of electronic real estate signs advances the objectives of planning in Victoria. The question is – what issue is this addressing, who will monitor and why is this required? I am not aware that it has been a problem.

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Proposal 3: Allow real estate signs to be displayed for 21 days after the sale or letting of a property without a planning permit

This proposed change is unwarranted. The purpose of the real estate sign is to advertise a property for sale. Once the property is sold the sign is no longer required.

It will only add to visual clutter by allowing signs to remain on display past the current 7 day period once a sale or letting has occurred. Given that in almost all instances Real Estate Agent can erect a sign within days of listing, what is the hindrance to removing signage in a similar timeframe? There is no justification for this change and it will be detrimental to the amenity of residential areas in particular.

Why is this needed? The only conclusion that can be drawn is that real estate agents seek to continue promoting their business for free, in residential streets long after the sale of the property.

Proposal 4: Allow multiple construction signs to be displayed on some sites without a planning permit

No issue – same as response to Proposal 1 for real estate signs.

Proposal 5: Allow 25% of a construction hoarding/building shrouding on each street frontage to be used to display signs without a planning permit

This may result in excessive signage and visual clutter, particularly in residential areas and for larger developments with longer construction periods.

Proposal 6: Allow certain Promotion signs to be displayed without a planning permit in industrial zones and the Port Zone

No objections

Proposal 7: Remove mandatory planning permit expiration dates for all signs except for Major promotion signs and Promotion signs that promote goods, services, events or matters not provided, undertaken or sold on the land or in the building on which the sign is sited

Expiry dates for signage enables the removal of redundant signage and should remain. Improvements could be made to have a more streamlined approval and permit extension process rather than removing the requirement for an expiration date.

Proposal 8: Remove the ability to specify sign requirements in the DDO

It is unclear why this change has been proposed, and what issue it is addressing. Sign requirements should remain an option in DDOs. The control of signage is still a relevant consideration for many applications of the DDO as signage impacts design and visual amenity issues. The suggestion that specific design guidance be set out in local policy instead is not appropriate – policy provides guidance on the application of a control which in this case sits appropriately within the DDO.



If you have any questions about any of the feedback provided, please contact Aaron Hewett, Senior Strategic Planner on 9518 3250 or email aaron.hewett@monash.vic.gov.au.

Yours sincerely

A handwritten signature in blue ink that reads "Sean McNamee".

SEAN MCNAMEE
Manager Strategic Planning



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24 November 2023

Mr Phil Burn
Director Planning Systems Reform
Department of Transport and Planning
PO Box 500
EAST MELBOURNE VIC 8002

Sent via email: planning.systems@delwp.vic.gov.au

Dear Mr Burn,

DISCUSSION PAPER – IMPROVING RESIDENTIAL DEVELOPMENT STANDARDS FOR SMALL LOTS

Thank you for the opportunity to provide feedback on the Improving Residential Development Standards for Small Lots Discussion Paper. Undertaking stakeholder engagement at the conceptual stage of a reform is worthwhile and encouraged.

Please note that due to time constraints this submission is an officer view submission only.

Our understanding of what is proposed

This Discussion Paper proposes changes to siting and amenity standards at Clauses 54 and 55 for dwellings on small lots of less than 300 square metres. The changes relate to street setbacks, site coverage, and walls on boundaries, and the decision guidelines for assessment of permeability.

The Discussion Paper states that “*small lots are predominantly located in the inner urban areas of metropolitan Melbourne*”. Our experience is that many small lots of under 300 square metres have been formed as a result of subdivision, both old and new, throughout the suburban areas of Melbourne, or are located near major activity centres. It should **not** be assumed that most small lots are in inner urban locations.

Whilst there may be merit in some of the changes, I do have a concern with the premise that seems to underly the changes being, *a small lot has restricted development potential so we should change the rules*. This is at odds with a key objectives of residential development standards in Victoria of minimising offsite impacts from development and is also inequitable for owners of larger lots.

The changes proposed are inward focused on the lot and are aimed at increasing development intensity on lots that, by virtue of their small size, are constrained. The changes fail to acknowledge the neighbourhood setting of a small lot, proposing a range of concessions to standards that would apply to a larger neighbouring lot.

It is considered that some of the proposed changes are minor and are merely tinkering around the edges, will not achieve the objective of more clearly defining acceptable design responses for small lots in an urban context and ultimately place the negative amenity consequences on neighbouring properties and the streetscape.

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Street Setbacks – Proposed changes to standards A3 and B6

The proposal includes changing the default front setback from 9 metres to 3 metres for small lots. These proposed changes to A3 and B6 as outlined in Tables A1 and B1 are not warranted as it is likely that many smaller lots will be in areas of similar sized lots with reduced setbacks, so street setbacks should reflect the average distance of abutting neighbours anyway. If the lot is in a more standard suburban area, the setback applied should be consistent with those greater setbacks.

A question that arises is also whether zone or overlay schedule requirements would over-ride these changes.

In addition, reducing the side setbacks from 2.0 metres to 1.5 metres is just tinkering and does not achieve any substantial improvements for development on small lots.

Site coverage – Proposed changes to standards A5 and B8

The Discussion Paper seems to focus on the difficulties of lots of less than 200 square metres in achieving the current site coverage requirements. This would only apply to a small number of lots and should not be used as a reason to unilaterally increase site coverage.

Given that these standards are discretionary, there is no need to single out small lots. Site coverage of 80% may be the reality for some lots but it should not be the standard.

There is also some concern about how this change would sit with any Environmentally Sustainable Development provisions that a number of Councils have in their planning schemes, that encourage both lower site coverage and higher permeability.

Permeability – Proposed change to standard A6 – deletion of a decision guideline

The proposed deletion of one of the decision guidelines for standard A6 is supported. In considering the other decision guidelines for standard A6 this last dot point is actually considered and addressed.

Walls on boundaries – Proposed changes to standards A11 and B18

Although it is more challenging to design a dwelling for a small lot to minimise its impact on neighbouring properties, it is an appropriate challenge to have. The “walls on boundaries” standards enable greater flexibility in design and are primarily of greatest use on small lots.

However, when it comes to the height of walls on boundaries, there is no justification for higher height on small lots. Allowing an additional 200mm wall height on the boundary is unlikely to result in improved design outcomes and cannot be justified. As this standard is also discretionary, there is the opportunity for increases in particular circumstances where minimal impacts can be demonstrated.



If you have any questions about any of the feedback provided, please contact Sherry Hopkins, Coordinator Strategic Planning on 9518 3071 or email sherry.hopkins@monash.vic.gov.au.

Yours sincerely

A handwritten signature in blue ink that reads "Sean McNamee".

SEAN MCNAMEE
Manager Strategic Planning



F22-27284

17 November 2023

Mr Phil Burn
Director Planning Systems Reform
Department of Transport and Planning
PO Box 500
EAST MELBOURNE VIC 8002

Sent via email: planning.systems@delwp.vic.gov.au

Dear Mr Burn,

DISCUSSION PAPER – MODERNISING CAR AND BICYCLE PARKING REQUIREMENTS

Thank you for the opportunity to provide feedback on the Modernising Car and Bicycle Parking Requirements Discussion Paper. Undertaking stakeholder engagement at the conceptual stage of a reform is a valuable way to obtain real world experience and encouraged, particularly for reforms that propose fundamental changes to the planning system in Victoria.

Our understanding of what is proposed

As we understand it the proposal is a fundamental change of approach, one that replaces the traditional specified parking rates, with a variable car parking requirement, based on Public Transport Accessibility Level (PTAL), introduces new land use groups based on empirical car parking demand (by workers/residents and visitors), and updated car parking rates based on PTAL and land use groups.

The car parking rates proposed include both minimum and maximum rates. The proposal also includes increased bicycle and end-of-trip (EoT) facilities rates based around PTAL and land use groups, and the consolidation of car and bicycle parking requirements in the VPP.

The Parking Overlay is proposed to be retained as an important tool to plan for change.

Transport and Parking in the City of Monash

The City of Monash is served by two train lines (Glen Waverley and Cranbourne/Pakenham lines), a large number of bus routes (including SmartBus routes), and no tram routes. There are three planned Suburban Rail Loop stations at: Clayton, Monash and Glen Waverley. The road layout for the majority of the municipality follows a mile grid pattern for arterial roads, with the key exceptions being Dandenong Road (Princes Highway) and the Monash Freeway.

Within the heart of the municipality is the Monash National Employment and Innovation Cluster (NEIC), being the second largest employment area outside of the Melbourne CBD. The Monash NEIC is reliant on buses as the only form of public transport as are students and staff attending the Clayton campus of Monash University. Four

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of the five major activity centres and four of the eight neighbourhood activity centres in the City of Monash are centred around train stations.

Significantly, Monash is a net provider of jobs with more than 76% of the some 116,000 workers travelling into Monash each day. Unsurprisingly, the majority of this travel, 74% pre-covid, was by motor vehicle. Whilst this dropped to 54% in the 2021 censal year, this can be attributed to the dramatic increase in the proportion of people working from home. Interestingly, in Monash at least, bicycle, train and bus travel all reduced between 2016 and 2021.

The most popular cycling routes are the Djerring trail between Caulfield and Clayton, Scotchmans Creek trail between Oakleigh and Glen Waverley, Gardiners Creek trail in Burwood, Ashwood and Chadstone, and the Dandenong Creek trail. However, for most residents, students and workers in Monash, the way they get around is by driving.

In 2017, Council adopted the *Monash Integrated Transport Strategy* with five key directions:

- A. A safer network
- B. A more accessible Monash
- C. Promote sustainable transport
- D. Support productivity
- E. Manage car parking

Council manages the majority of land that is used for car parking including at-grade and multi-deck car parking facilities in activity centres (some of which have been funded historically through parking contribution schemes). Council also manages local streets where car parking demand ranges from low (in less dense suburban streets) to extremely high (in busy activity centres and near train stations).

Council supports improvements to the public transport system to make it more viable for everyone living, visiting and travelling to or through Monash.

Bus service frequencies are generally poor, especially on weekends, and lack of quality bus infrastructure, including shelters, paths bus priority on roads and at intersections are significant barriers to mode shift and increase public transport usage.

The image at the end of this letter shows a bus stop on Ferntree Gully Road in the centre of the Monash NEIC. Clearly there is significant room for improvement in the provision of bus infrastructure to reduce the demand for motor vehicles.

There are also bus routes that are overcrowded during peak times on weekdays.

Responses to individual questions

As invited in the Discussion Paper, please find below the responses to the questions raised throughout the document:

1. Do you think PTAL is an appropriate way to apply car parking requirements?



In principle, measuring PTAL is an appropriate way to apply car parking requirements. It should already factor in decision-making by planners but it is useful to imbed public transport access into the permit trigger without having to go through the process of applying Parking Overlays. The previous reforms in automatically applying reduced car parking rates in PPTN areas were a blunt response to a complex issue. They made no allowance for the actual service level, service quality and service frequency. Consequently, they provided an extremely optimistic view of the PPTN. The PTAL approach appears to be attempting to address some of the qualitative shortcomings.

2. What do you think about the methodology used to define the suggested PTAL for Melbourne?

The methodology needs to be very transparent and easy to explain to the public. The model would need to consider not just the geographical cover of public transport services but also the qualitative factors that actually drive patronage. These include service frequency, accessibility, bus stop infrastructure and convenience of the services. The model should be available as open data, and it should be possible to use the data to explore options that would improve the PTAL score.

The concepts definitely need further consultation as this is a very different methodology to use as the basis for parking provision. We would want to be able to test the assumptions about car parking rates before they are adopted, and assess whether the mapping accurately reflects accessibility.

The rates don't seem to differentiate well enough between uses and whether historically people are more likely to drive or not. For example, the provision for supermarket seems too low, particularly given traditional habits of driving there and transporting goods (often too much to carry) home on public transport or on foot. Noting also that supermarkets and hard top shopping centre owners have traditionally heavily invested in understand their parking needs, to the point where they have been a major catalyst for reduced numbers over time.

Whereas for more informal recreational type activities such as attending a bar (and even restaurant) changing societal patterns mean that people are more likely to catch public transport, cycle, or take a taxi or rideshare to their destination.

It is not clear in the discussion paper whether distance from the Melbourne CBD is causal or correlational. Creating a causal relationship between a PTAL score dependent on its distance from the CBD is problematic. While it is useful to acknowledge that public transport in Melbourne is highly centralised, it's another thing to enshrine this into a PTAL score. The PTAL score should be exclusively about access to public transport services. In some inner city locations, access to public transport can be limited and inconvenient, and may only be available to/from the CBD rather than other destinations.

Basing PTAL scores on morning weekday peak services is cherry picking the public transport provision. It also provides a misleading picture of the real level of public transport provision. In fact it is reinforcing the current problem of the radial public transport system that is primarily focused on moving commuters to the CBD. Many service levels drop off dramatically after peak hour, which combined with the conclusion of peak hour car travel, makes car travel an even more attractive option to the disjointed 40 minute bus service.

The use of peak hour service standards also seem counter to the overall policy objectives of encouraging a poly-centric city and continues to emphasis the relative ease of access to the CBD available across much of metropolitan Melbourne.

The inputs into determining a PTAL score should take a more balanced real-world approach to the calculation of the score. It should either be based on the worst time of the week for public transport services (Sunday PM) or averaged across the week to account for infrequent weekend services. It should be

noted that some destinations, such as in popular entertainment areas, many of the businesses aren't open on a weekday morning, and it is arguable whether public transport services to that area would be optimised for that time of day.

3. Do you agree with removing minimum car parking rates in areas with a medium or high PTAL?

In principle, yes, so long as it's not about proximity to the CBD but rather excellent or very good access to multiple modes of frequent, accessible and convenient public transport. High PTAL should be based on excellent access, and Medium PTAL should be based on very good access. A fifth level could be included between Medium and Low that could be a measure for good access. Without adding a middle category, it would be difficult to support removing minimum car parking provisions from Medium PTAL score areas – just because of the level of change it creates and the Medium only representing good access.

Some of the proposed maximum rates could be too low and may create a regulatory burden. The maximum rates should be introduced slowly to encourage mode shift.

The more fundamental problem is that the PTAL score doesn't consider the use catchment, only the use location. For example, some activity centres could have Medium/good access PTAL, but the catchments they service may have poor public transport, and high car usage, and the proposed maximums may be insufficient. For example, Glen Waverley Major Activity Centre has multiple bus lines and a train station (and a proposed SRL station), but it also contains the only supermarkets in the whole suburb of Glen Waverley extending 3.5km from the centre. Many parts of the suburb forming the catchment for the activity centre have very poor public transport and are relatively low density with high car use. Residential locations around 3 kilometres from Glen Waverley require a 30 minute bus journey plus the walking time to the bus stop.

Specifically, in relation to the proposed car parking rates:

- Minimum parking per dwelling in Poor PTAL score areas is 1 space per dwelling regardless of bedroom numbers. Plus 1 visitor space for every 5 dwellings with 2 or more bedrooms. Poor PTAL score areas should be maintaining the status quo rates. Reducing the onsite parking provision in these areas will not discourage car ownership and is likely to have the perverse results of forcing more cars to onstreet parking, further impeding buses and bicycles. This can be seen writ large across the majority of urban growth areas, particularly in multi car households as children become young adults and work.
- Maximum number of parking spaces per dwelling (3 for 2+ bedroom dwellings) in Low PTAL score areas. People often rely on a driveway to accommodate a second car spot. Would the rate mean that long driveways and other arrangements may trigger the need for a permit?
- Maximum rates can be exceeded with a permit. What is the point of requiring a permit to exceed the maximum car parking provision? What would the criteria? What is the permit seeking to mitigate? We are potentially creating the scenario where we are creating regulatory burden in the opposite direction when full line supermarkets operators are wanting to meet empirical demand in areas with a Medium PTAL score. Again, this points to the need to add an additional PTAL category that doesn't impose maximum rates.
- Accessible parking does not appear to be considered in the maximum parking rates where no visitor parking is required. This is often an issue with childcare centres and schools with students with a disability who need onsite access.
- Childcare centres and private schools generally provide pick up/drop off parking on site and the parking rates don't appear to reflect a need to provide visitor parking.



- The maximum rate for medium & high PTAL trade supplies visitor parking (1 per 4 max visitors) seems undersupplied given that many items would need to be transported via motor vehicles. This is acknowledged in the bike parking rates for Trade Supplies, “Due to the nature of trade supplies stores, it is expected that bike use will be lower than other uses...”
- The maximum rate for visitors for medical centre & vets for medium PTAL does not appear to be sufficient to cater for visitor attendance for sick people or pets with 50% expected to use alternative transport. Centres would usually operate with waiting times, meaning both one visitor within the appointment room and 1-2 waiting.
- The rate for education centres should consider the potential users of the facility. In education centres for primary school students, the students are most likely to be driven to classes with parents parking for the duration of the class.
- Query why there is no visitor bike parking requirement for residential hotels?

4. What do you think about implementing a PTAL-aligned approach in regional Victoria?

The system should be consistent across the state, however, we acknowledge that there are very few examples of an approach like PTAL working outside of metropolitan areas. There is unlikely to be a score above Low in most of regional Victoria outside of Geelong and outside of the core of some larger regional cities.

5. Do you agree that the Parking Overlay should remain in the planning scheme?

Yes. Retaining the Parking Overlay is useful for future planning ahead of changes to public transport services and increased population density. It can also be used to provide different design requirements.

If the PTAL approach duplicates the need for a specific Parking Overlay schedule then it should be removed with the agreement of the relevant planning authority. For example, most of the Parking Overlays used in the Melbourne Planning Scheme, which only apply maximum rates, may no longer be required. Councils should not have to undertake their own amendments (prescribed or otherwise) to remove redundant provisions created by a state-wide provision.

6. What do you think about digital implementation of recommended rates through VicPlan?

So long as it is possible to ascertain historical records of PTAL scores then there should be no issue with having the model available in VicPlan. Producing a set of static maps may also be necessary to retain historical information to aide with compliance by councils and VCAT.

7. Do you agree that PTAL should be used to determine bicycle parking rates and EoT facilities for land use groups?

Absolutely not. There is no demonstrated nexus between public transport access and bicycle parking demand. It's not possible to bring bikes on buses and trams and bike storage facilities are only available at train stations.

Additionally, bicycles as a transport alternative to the car or public transport are a niche mode. They do not cater to people with mobility or health issues, older people, people engaged in retail activities, multiple trip users or the vast bulk of the population.



The use of bicycles is affected by the climate, the seasons, the weather conditions and the topography of an area. Despite the Cities of Yarra and Port Phillip having very good bicycle facilities and being quite flat, bicycle usage as a journey to work mode does not exceed 3%.

A separate model (perhaps a 'Bicycle Accessibility Level') should be developed that measures the proximity to safe (i.e. separated), accessible and abundant bike routes. A mechanism like a Parking Overlay may be useful to bring in additional bicycle parking requirements ahead of a planned strategic cycling corridor or major upgrade.

8. Do you agree with proposed minimum bicycle parking rates?

Yes, the bicycle parking rates should be increased and it is useful to assess demand based on different groupings of land uses based on projected demand by workers and visitors. However, as discussed above, the rates should be based on accessibility to bike routes that are safe and separated, rather than PTAL scores.

9. Do you agree with adopting new design standards for bicycle parking and EoT?

Yes, these are logical.

Long-stay bicycle parking should be provided at ground level or be accessible via a ramp. Maximum ramp grades for cyclist access to parking should be required. There is often an unreasonable expectations by developers that cyclists use the same driveway ramp as motor vehicles with grades as steep as 1:4 which is unreasonable.

10. What do you think about consolidating parking requirements within a single, streamlined statutory control for cars, bicycles and EoT facilities?

This is not necessary. Both clauses are already very long and the reforms in the Discussion Paper will likely make them even longer. Providing (or requiring) additional bike parking in compensation for a car parking dispensation is already something that is commonly done despite the provisions being in two clauses. Doing the opposite approach – separating out requirements into different clauses based on different PTAL and Bicycle Accessibility Level scores – might make things more accessible to both planners and other users of the planning scheme.

It would also be useful to separate the design requirements from the permit triggers, bringing it into alignment with other particular provisions in the VPP. Any changes to the bicycle controls should be considered in the context of our comments at point 7. It important to reinforce that a bicycle parking spot should not be considered as a like for like replacement car parking bay by default in any of the review process.

Opportunities for further engagement with local government sector

We welcome DTP's commitment to early engagement at the conceptual stage on this important reform with the local government sector and parts of the planning industry more broadly. We do think, however, that in the interests of transparency and accountability discussion papers like this one should be made available online for feedback from the general public and other interested parties, and brought to the planning industry's attention



via Planning Matters and PIA's Planning News. Casting a wider net at the stakeholder engagement stage assists in a more fruitful and fulsome discussion.

If the approach outlined in the Discussion Paper is adopted, then we would anticipate that there will be further opportunities to provide feedback on any draft provisions. The full understanding of the PTAL scores that are within our municipal boundaries would allow us to workshop some scenarios to 'ground truth' the provisions.

If you have any questions about any of the feedback provided, please contact Aaron Hewett, Senior Strategic Planner on 9518 3250 or email aaron.hewett@monash.vic.gov.au.

Yours sincerely

SEAN MCNAMEE
Manager Strategic Planning

