



Modernising car and bicycle parking requirements

MAV Submission

December 2023

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While this paper aims to broadly reflect the views of local government in Victoria, it does not purport to reflect the exact views of individual councils.

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1 Executive summary

The Municipal Association of Victoria (MAV) welcomes this opportunity to respond to the Department of Transport and Planning's (DTP) consultation paper "*Modernising car and bicycle parking requirements.*"

The Municipal Association of Victoria is the peak representative and advocacy body for Victorian councils. The MAV was formed in 1879 and the *Municipal Association Act 1907* appointed the MAV the official voice of local government in Victoria.

Today, the MAV is a driving and influential force behind a strong and strategically positioned local government sector. Our role is to represent and advocate the interests of local government; raise the sector's profile; ensure its long-term security; facilitate effective networks; support councillors; provide policy and strategic advice; capacity building programs; and insurance services to local government.

The MAV supports integrating the sustainable transport hierarchy into planning decisions. Significant modal shift is required for Victoria to meet its net-zero emissions target by 2045. The MAV supports the DTP review and reform of Victoria's car and bicycle parking planning requirements to encourage travel behaviour change while reflecting shifting development contexts.

The DTP's proposed reforms will, if well implemented, likely decrease the number of applications to councils to reduce or waive car parking requirements. This will free up council planner time, reduce strategic planning demands on local car and bicycle parking issues, and address oversupply of parking while encouraging sustainable development by supporting:

- an integrated transport system
- delivery of healthy, vibrant 20-minute neighbourhoods
- the move toward zero net emissions

2 Introduction

Since the introduction of car parking rates in the planning scheme, the social, financial and environmental benefits of living close to where you live, work, learn and play have become increasingly recognised.

Local and State planning policy often now directs new homes to transport and services-rich corridors so more people can access jobs and services easily without needing a car. Meanwhile the car and bicycle parking particular provisions have remained static. It is unclear if the existing rates were ever tailored to the Victorian planning and development context.

Modernising car and bike parking requirements, as well as introducing a Public Transport Accessibility Level (PTAL) into planning and development decisions will align Victorian policy with local and international best practice.

Councils' submissions to the discussion paper have reflected upon the policy's implications for local areas and provided additional feedback to ensure these reforms drive desired behaviour change. We also note that the Council Alliance for a Sustainable Built Environment (CASBE) submission supports the proposed reforms and makes a number of suggestions to improve them through an ESD lens. We urge the department to consider the council and CASBE submissions closely.

This submission outlines the MAV's position on the proposed changes, and comments on areas for further consideration by the DTP in governing the rollout of these necessary reforms.

3 Discussion paper proposals

Proposal 1 – Public transport accessibility level (PTAL)

We support the implementation of a PTAL for Victorian land use and development planning decisions. Councils already implement policy that ties car parking provisions to proximity to public transport through planning decisions to waive or reduce provision of car parking. These reforms will strengthen this policy approach. We support in principle:

- removing minimum parking rates in areas with medium to high PTAL levels
- digital implementation of the PTAL. Integrating the PTAL with digital planning tools such as VicPlan, planning property reports and Digital Twin will support transparent decision making. A digitised system can be easily updated in real time to ensure accurate decision-making
- retaining the Parking Overlay (PO). Councils are satisfied that the PO can continue to co-exist with the PTAL as it reflects place-based circumstances following rigorous review by a planning panel
- a state-wide implementation of PTAL. We urge the DTP to ensure that regional Victoria, particularly the regional cities and peri-urban growth areas, are not unfairly disadvantaged by a low to poor PTAL level. These areas want innovative development integrated with investment in better public and active transport infrastructure to reduce parking demand.

While we support the policy in principle, an accurate and acceptable PTAL mapping exercise must be undertaken by the State. We want to see data collection, sharing and updates to the PTAL undertaken transparently and to be place-based. The key challenge for the DTP will be data collection and sharing.

Data to map networks of cycling infrastructure, footpaths, car share, accessible stops, and frequency of service is patchy at best across the state. While there is an opportunity to fill those

gaps, the DTP will likely have to work across multiple government portfolios, councils, service authorities, road authorities and potentially community groups to get an accurate picture of on-the-ground reality. This will be a costly and time-consuming undertaking to get right.

Without detailed data that is easy to access and update, the DTP risks implementing a PTAL that does not accurately reflect how people move around their town or city. This will let down communities seeking to reduce car usage and undermine efforts to encourage development that reduces car dependency. For example, we do not want to see rural areas and regional towns and cities miss out on development that promotes use of public and active transport, where available.

Consultation needed on PTAL mapping

It is essential that draft PTAL mapping be provided to councils ahead of implementation into planning schemes. Hasty introduction of PTAL mapping, without consultation with councils, could lead to unintended negative consequences and lack of alignment with council strategic policy and community aspirations.

The DTP should commit to regular reviewing and updating of the PTAL, including consideration of approved and imminent PT and active transport upgrades. A place based and timely PTAL will reflect the dynamic and changing nature of people's transport needs. It is also likely that planning decisions based on PTAL mapping will drive more investment in public and active transport in those areas, therefore expanding the PTAL area again.

Local destinations and accessibility should be recognised

With the DTP considering a state-wide PTAL model, consideration also needs to be given to local travel networks and destinations. Accessibility to activity centres that are local destinations for work, services and retail could be integrated into the mapping. Regional cities and outer-urban councils have identified local activity centres and have policies to encourage density and improve access to those areas. Proximity to an activity centre can reduce car dependence while encouraging active transport in areas with low frequency public transport.

Towns and cities are dynamic and changing places. Increased local, state and federal government investment in public and active transport projects can change the fabric of local areas and support increased density. The PTAL should include funded, certain and imminent public transport improvements to avoid over supply of car parking.

Ensure the PTAL reflects a Victorian context

Victoria has an opportunity to develop a PTAL model based on international best practice but applied to local conditions. Other than perhaps Sydney, examples such as London bear little resemblance to the Melbourne's urban form or Victoria's public transport networks. A more inclusive PTAL will ensure more people and developments make the most of available public and active transport. This submission has already identified accessibility to local activity centres as a priority consideration, on-the-ground walkability, bicycle networks, topography and key pedestrian routes could be included in Victoria's PTAL.

Recommendations:

- **DTP commit to a transparent process of developing the PTAL methodology and sharing of data. This includes sharing mapping for consultation with councils and communities, with an appeal process to investigate discrepancies**
- **DTP run an ongoing monitoring and review process of the PTAL to ensure changes to public and active transport networks at the local level are accurately reflected in the mapping and planning schemes**
- **DTP provide a more detailed methodology and explanation of assumptions that allow for PTAL to drive place-based outcomes for Melbourne and rural and regional Victorian contexts**

Proposal 2 – New land use groups

The MAV supports a review of land use terms and groups as part of the reforms. We broadly support the proposed new land use groups as outlined in the discussion paper. We understand that further refinement and additions will be made by DTP as the project progresses.

Councils and industry should be kept abreast of any changes made to the land use definitions and groups. Councils will be able to assist by sharing local examples of different land uses and the car parking, bicycle parking and traffic demands they produce. Councils will also ultimately be tasked with balancing industry demands with community expectations in planning decisions relating to car parking.

It will be difficult for the DTP to ensure the groupings work for all areas and regions of Victoria. It is recommended the land use groupings and PTAL be considered in a place-based context, particularly for peri-urban and rural areas. Councils should be supported with expedited amendment pathways to implement necessary changes to local policies or to introduce Parking Overlays to meet local requirements.

Recommendations

- **DTP consult with councils as it refines land use terms and groups to ensure the provisions reflect local reality, are fit for purpose and can be implemented on day one of the changes**
- **Ensure changes to or introduction of new terms also be reflected in Clause 73.03 Land Use Terms to ensure easy use of the planning scheme**

Proposal 3 – Updated car parking rates

The direction of updating car parking rates proposed by the discussion paper is generally consistent with MAV policy positions on integrating transport and land use. Councils call for better integration of land use and infrastructure planning to control congestion, increase accessibility to critical services and improve community connections. Car parking rates, bicycle infrastructure and end of trip facilities are important in supporting these goals.

It is likely that some developers will still apply for parking rates over the parking maximums allocated in high and medium PTAL areas, while some communities will be concerned by reduced parking spaces in new developments in their neighbourhood. On this point, the DTP has drafted proposed decision guidelines. We support the proposed guidelines but note there are opportunities to include provision of EV charging, car share spots, local bicycle lane and walking upgrades, and the need to define 'planned public transport accessibility'.

Recommendations:

- **DTP continues to consult with councils and industry on appropriate car parking rates appropriate to Victoria's development context at the local scale**
- **DTP considers feedback and opportunities to encourage provision of EV charging, car share spots, local bicycle lane and walking upgrades, and the need to define 'planned public transport accessibility' as part of the decision guidelines for updated rates**

Proposal 4 – Bicycle parking and end of trip (EoT) facilities

While calculated and applied in much the same way through the planning scheme, car parking and bicycle parking rates are applied for different reasons. While car use is discouraged through behaviour change methods and better integrated transport planning, we want to see an increase in travel by bicycle.

Bicycle usage continues to grow in popularity, particularly with better and cheaper E-bicycles now available. We want to encourage provision of bicycle spaces and end of trip (EoT) facilities, especially in areas with poor public transport access but with opportunities for active transport.

Tying bicycle parking provision to the PTAL is a flawed approach for the following reasons:

- if the desired outcome is to increase active transport in all locations, the accessibility of public transport is not relevant
- lower PTAL locations should not be further disadvantaged by having planning scheme requirements dictating less infrastructure for cycling in areas with low or poor PTAL. Equal access to bicycle parking and EoT facilities should be encouraged, irrespective of location.
- cycling infrastructure, including EoT facilities, work together with the public transport network. Integrating bicycle trips with the public transport network extends catchment areas and makes cycling infrastructure even more important, particularly in areas that will have poor or low PTAL
- cycling is popular for easy trips and for recreation irrespective of location or future application of the PTAL. This is especially important for those who do not drive, have limited access to a vehicle or public transport. To promote health and wellbeing in childhood through to adulthood we want to encourage cycling in all locations

- in areas with a poor cycling network, having good levels of bicycle parking and EoT facilities is important to create demand for bicycle paths and maximise public investment in bicycle infrastructure. Safe on and off-road cycling infrastructure is also crucial

The suggested rate of at least 5% of bicycle parking for electric bicycles and cargo bicycles is too low. This figure may be appropriate for larger dimensioned bicycles such as cargo bikes, but provision for e-bikes should be additional and desirably at a much higher rate. E-bike use is growing rapidly and ensuring appropriate parking and e-charging provisions in new developments removes an important barrier to increased use.

This rate needs to be considered as part of the proportion of horizontal and floor mounted parking. That design standard may be better described as “All Visitor parking, non-standard parking and e-bike parking must be provided at ground level along with at least 50% of other long stay bicycle parking.”

Recommendations:

- **Ensure planning scheme requirements for bicycle parking and end of trip facilities are not reduced for any location**
- **Bicycle parking and EoT facility rates be prescribed by land use, and not varied by PTAL.**
- **Adjust the design standard for non-standard dimension and e-bikes to read “At least 5 per cent of bicycle parking to allow users to park horizontally and at ground level cargo and other non-standard bicycles and additional space to allow users to lock e-bikes**
- **Consider in conjunction with relevant requirements of the Building Code appropriate standards for the charging of e-bikes and electric vehicles.**

Proposal 5 – consolidated parking and EoT facilities provision in the VPP

The MAV supports this proposal. Consolidated provisions simplify the planning scheme for users.

4 Additional feedback

State Government investment in public and active transport

Reduction in parking provision alone is unlikely to result in reduced car dependence and changed travel behaviours. An integrated approach is required across government, particularly investment in improved and strategically planned cycling and walking infrastructure.

The proposed reforms in the discussion paper are part of a larger push to shift travel behaviour. The Victorian Government should support this transition with greater and ongoing investment in public and active transport infrastructure.

Many councils already have integrated transport plans, pedestrian strategies and cycling strategies that are being progressively implemented. These strategies have the potential to unlock a range of positive health and social outcomes across Victoria. However, they require more buy-in from other levels of government and agencies, such as the DTP.

Victoria's growing population and economy requires a properly planned transport network. A clear, prioritised and sequenced transport plan – as required by law and recommended by Infrastructure Victoria – is critical to ensure smaller, effective local projects are properly addressed and that the Big Build does not absorb most resources and funding. Better integration of land use and infrastructure planning is essential to manage congestion, increase accessibility to critical services, and improve community connection.

Impacts on council parking provision

Councils play an important role in supporting changes to travel behaviour. Along with promoting active transport, councils also regulate on-street parking including by providing physical spaces and issuing parking permits. Transport-rich areas, particularly in inner-Melbourne, are already quite limited with parking permits and short-term parking availability. Councils in these areas closely monitor parking demand.

Reducing parking requirements on off-street development will likely result in increased demand for publicly available on-street parking. Councils will need time to review parking demand considering the proposed reforms and state policy position.

Electric vehicle charging

Many countries are moving towards the banning of internal combustion engines and the adoption of electric vehicles. These vehicles require charging, often at locations where they will be parked for long durations such as overnight at residential properties. It would seem logical to require all future residential parking spaces and office parking spaces that support a vehicle fleet to provide charging for electric vehicles. This is a matter that may require coordinated design and implementation with Building Code requirements.

Recommendations:

- **The Victorian government develop a comprehensive Transport Plan for Victoria that seeks to deliver behaviour change by providing more public and active transport options**
- **Appropriate lead time be given to councils to review and change public parking availability before introduction of any planning scheme changes**
- **Consider the need for electric vehicle charging facilities, particularly for all residential parking and office related parking that supports fleet vehicles.**