



1 April 2016

Mr John Phillips
Planning Systems
Level 18, 1 Spring Street
Melbourne VIC 3000

Ask for: Bill Millard
Phone: (03) 9932 1096
Our Ref: A2342916

Dear Mr Phillips,

Property Council of Australia request to amend parking provisions for industrial and warehouse development

Council appreciates the opportunity to comment on the Property Council of Australia request to amend the parking provisions for industrial and warehouse development in Clause 52.06 of the Victorian Planning Provisions (VPP).

Attached to this letter is Council's submission to the Department of Environment, Land, Water and Planning (DELWP) regarding the request.

If you would like to discuss this submission further please contact Bill Millard, Director Strategic Development on 9932 1096 or email bmillard@hobsonsbay.vic.gov.au.

Yours sincerely,

Chris Eddy
Chief Executive Officer

Hobsons Bay City Council – Submission to Policy Paper Victorian Car Parking Ratios for Industrial Development Clause 52.06 of the Planning Scheme

March 2016



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INTRODUCTION

1. Hobsons Bay City Council welcomes the opportunity to provide a submission to the Department of Environment, Land, Water and Planning (DELWP) regarding a request from the Property Council of Australia (PCA) to amend the parking provisions for industrial and warehouse development in Clause 52.06 of the Victorian Planning Provisions (VPP).
2. Council supports the initiative to continuously review the parking provisions in the VPPs to ensure high-quality planning outcomes. The role of Council's Planning department is to balance competing priorities for the net community benefit, therefore complex planning matters such as car parking must be informed by rigorous planning processes as prescribed by the *Planning and Environment Act 1987*.

HOBSONS BAY CONTEXT

3. Hobsons Bay is situated approximately seven to 20 kilometres south west of the Central Business District, covering an area of 66 square kilometres. The municipality has a population of approximately 91,148 people which is forecast to increase by 18 per cent by 2036.
4. The municipality has a strong industrial history and is home to a number of industries of State and National significance. The majority of the industrial land is concentrated in Altona.
5. At present, 27 percent of land is zoned for industrial purposes in Hobsons Bay and it has a suite of industrial zones to cater for a diverse range of industrial uses. These include:
 - Industrial 1 Zone (IN1Z) – the purpose of this zone is to provide for more intense manufacturing industry, storage and distribution
 - Industrial 3 Zone (IN3Z) – the purpose of this zone is to provide a buffer between IN1Z and more sensitive uses
 - Special Use Zone Schedule 2 (SUZ2) – a specific zone in the Hobsons Bay Planning Scheme (HBPS) to provide for the operation and modernisation of the petroleum refining industry
 - Special Use Zone Schedule 3 (SUZ3) – a specific zone in the HBPS to provide for the operation and expansion of the petrochemical industry and minimises exposure to risk to health or life of persons in the area
 - Special Use Zone Schedule 4 (SUZ4) – a specific zone in the HBPS to provide for a range of industrial uses and services that do not prejudice the petrochemical industry and minimises exposure to risk to health and life of persons in the area
 - Special Use Zone Schedule 5 – (SUZ5) – a specific zone in the HBPS to support major marine industrial development and recognise the importance of Port of Melbourne
6. In 2008, an Industrial Land Management Strategy (ILMS) was prepared to provide clear strategic planning direction in relation to the future use and development of industrial land in Hobsons Bay over the next 10 years and set out the foundation for continued development beyond that point. The strategy identified 22 industrial precincts that were subsequently defined by three categories, core industrial, secondary industrial and strategic redevelopment areas (SRAs).
7. Industrial Development Design Guidelines 2008 were also developed to provide further guidance on design and development of industrial areas, including provision and design of parking areas. Parking is a valued resource and a key issue for the community in

Hobsons Bay therefore effective management of parking is imperative for a vibrant and sustainable city.

KEY ISSUES AND CONSIDERATIONS

8. This section discusses Council's position regarding the PCA proposed changes to Clause 52.06.
9. Key issues include:
 - recent review of the car parking provisions undertaken by the state government to better align the provisions with current demand
 - a flexible planning tool that facilitates a range of industrial zones and uses within Hobsons Bay
 - economic implications and land use inefficiency
 - lack of adequate transport alternatives in industrial areas

Recent review of the car parking provisions

10. A number of reviews have been undertaken by the Victorian Government in the past fifteen years to improve the planning system. Council submitted their position on a car parking review to the relevant Advisory Committees both in 2007 and 2011.
11. Fundamentally parking is derived from specialised traffic and transport planning knowledge therefore an empirical basis for any parking rate reductions is necessary. The proposal currently under review (submitted by PCA) seeks further amendment to the parking rates without any empirical justification. As outlined in the Advisory Committee report (2008) a number of submitters criticised the lack of empirical basis for the proposed rates in the review. Council's position on the matter aligns with this view.
12. Additionally, the Advisory Committee (2011) appointed by the Minister for Planning undertook a robust planning process to ensure new parking provisions were appropriate. The revision of Clause 52.06 was considered necessary to better reflect the current parking demand and the reduction in car parking requirements based on the best practice parking regulation empirical data and overseas examples. Community and stakeholders views were sought to inform the recommendations of the Advisory Committee report (released 2012) and the subsequent planning provision (amendments VC90 and VC95) that is currently applied.
13. The Advisory Committee report (2011) outlines the complexities that planning authorities encounter when assessing planning applications by highlighting that *"In practice, planning authorities will need to balance policies relating to economic development and supporting local business against the sometimes expensive requirements on a developer to provide parking. Individual site decisions will need to consider: the existing under or over supply of car parking; the history of the site (what is fair to other land owners); and a range of other matters in determining the appropriate response. Clause 52.06 sets out factors to consider in assessing any reduction in car parking requirements for a particular location."*¹
14. The Advisory Committee commentary regarding the reduction in parking and consideration of the site context identify the need for a flexible planning approach to applying car parking rates. These recommendations were translated into the planning control and more appropriate parking rates were set out in the table of parking requirements at Clause 52.06.

¹ Advisory Committee Report, Car Parking Provisions, January 2012

A flexible planning tool to facilitate all industrial zones in Hobsons Bay

15. As mentioned above, almost a third of land in Hobsons Bay is dedicated to industrial uses that comprise of a range of industrial zones. The purpose of each zone specified is different and provide for a diverse range of industrial uses, some more intense and other smaller scale or diverse commercial uses.
16. In Hobsons Bay, SUZ4 has a provision which limits employee population density and prohibits residential uses other than a caretaker's dwelling to ensure protection from the surrounding petrochemical industries. The purpose of IN3Z is to provide for limited retail opportunities and a buffer between more sensitive and industrial uses. Therefore, the type of warehouse and industrial uses may vary significantly between these two zones. Fundamentally, the planning authority can exercise discretion in waiving or reducing parking requirements when assessing a planning permit considering each case on its individual merits. Proponents are presented with an option to appeal Council's decisions at the Victorian Civil and Administrative Tribunal (VCAT).
17. Unlike the Wyndham and Brimbank Councils examples highlighted in the PCA report, Hobsons Bay has a range of diverse industrial areas where car parking availability is an issue. The Williamstown North industrial area is an example where warehouses have been approved and developed only to be leased for a different purpose that requires more parking than the originally envisaged use. Therefore appropriate parking provision at the construction stage will ensure more adaptable industrial buildings that can be utilised for a more diverse range of industrial uses in the future and provide lucrative business opportunities.

Economic implications and land use inefficiency

18. The Victorian Metropolitan Policy: Plan Melbourne 2014 (Plan Melbourne) states that economic productivity and investment should be underpinned by greater transport and land-use efficiency. It also acknowledges that the planning system should *"...respond to long-term patterns of economic, social and environmental change; that enhance Melbourne's liveability; and that capitalise on opportunities to strengthen our productivity and competitiveness."*²
19. The PCA report indicates that provision of parking is having implications on the future industrial land supply stating that *"Simply removing this inefficiency would extend the net useable land supply to 18.75 years by 2030, rather than the current 15 years."*
20. Appropriate design response of the industrial development can significantly reduce required land for both industrial and warehouse purposes.

Lack of adequate transport alternatives

21. Plan Melbourne recognises that *"To maintain competitiveness, we need to ensure that land supply for commercial and industrial development is adequate, well-located and appropriately serviced."*³ Hobsons Bay industrial areas are currently not served by rail-based public transport but have major east-west freeway and road links that provide access by private vehicles. Some industrial areas have limited bus services, particularly in Williamstown North, Altona North and Laverton.
22. Additionally, Council is a strong advocate for active transport initiatives and improved public transport. Council's commitment to improved car parking resources and accessible travel initiatives for long term sustainability is reflected in the Community Health and Wellbeing Plan 2013-17 and Council Plan 2013-2017.

² Victorian Metropolitan Policy: Plan Melbourne 2014, page 2.

³ Victorian Metropolitan Policy: Plan Melbourne 2014, page 22

23. Consequently, the most significant obstacle in achieving a balance between the use of motor vehicles and other modes of transport is the availability of efficient and dependable public transport and adequate linkages between the various modes of transport in Hobsons Bay's industrial areas. To holistically address this issue, any further modification of the car parking policy must be made simultaneously with adequate resourcing and commitment to public transport infrastructure improvements at a State Government level.

CONCLUSION

24. Continuous review of the parking provisions in the VPP will ensure that planning schemes are current and reflective of the social, environmental and economic trends.
25. Therefore, Hobsons Bay does not support changes to the parking provisions without sound examination that encompasses all matters considered by responsible authorities when assessing the planning applications.
26. A more holistic approach to achieving best practice and evidence based parking outcomes in the VPPs may be through an ongoing monitoring and evaluation process. This will ensure that significant time, effort and finances dedicated by councils, developers and other stakeholders are minimised.