Fishermans Bend Planning Review Panel

Draft Amendment GC81 in the Fishermans Bend Urban Renewal Area – 272-280 Normanby Road, South Melbourne

Prepared for
Submitter 202 to the GC81 Panel

Instructed by
Minter Ellison

April, 2018
24408A#3

STATEMENT TO THE PLANNING PANEL APPOINTED BY THE MINISTER FOR PLANNING FOR AMENDMENT GC81 IN THE FISHERMANS BEND URBAN RENEWAL AREA BY CHARMAINE DUNSTAN, TRAFFIC ENGINEER
Fishermans Bend Planning Review Panel  
Draft Amendment GC81 in the Fishermans Bend Urban Renewal Area – 272-280 Normanby Road, South Melbourne

**Executive Summary**

This report provides an assessment of the potential traffic engineering impacts of Amendment GC81 of the Fishermans Bend Urban Renewal Area in so far as it relates to the live planning application (Planning Application No. PA1600106) for a proposed development at 272-280 Normanby Road, South Melbourne.

The application is for a mixed use development comprising 289 dwellings and 784m² of retail floor area. The proposal provides for 215 car spaces for 289 dwellings, at a rate of 0.74 car spaces per dwelling. I note that the car parking rate increases to 0.79 car spaces per dwelling when the affordable housing component of the development (17 dwellings) is not taken into account. Vehicle access is proposed via Munro Street along the site’s northern boundary.

I have provided detailed evidence on car parking matters in relation to Amendment GC81 for the Fishermans Bend Urban Renewal Area, which is outlined within my expert witness statement under instruction from Norton Rose (24408A#1 dated March, 2018).

I share these opinions as they relate to the applicable parking rates for this site and the live application, which has been called in by the Minister.

As these concerns relate to this site, in my view the parking rates and expectations should not be more onerous than would apply to other Capital City Zones that are better served by public transport. The rate for dwellings should remain as 1 car space per dwelling as set out in the existing Parking Overlay. There is also a need for greater flexibility of the additional car parking plan requirements as there will always be practical exceptions in relation to matters such as car share, adaptable parking and other relevant site specific aspects of a design.
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1 Introduction

Draft Amendment GC81 has been prepared to implement the Vision for Fishermans Bend through a suite of permanent controls including amendments to the Melbourne and Port Phillip Planning Schemes and a new Fishermans Bend Framework.

The Minister has appointed an Advisory Committee pursuant to Part 7, section 151 of the Act to report on the “appropriateness” of the draft Amendment GC81 and is to be known as the ‘Fishermans Bend Planning Review Panel’ (Review Panel). The Terms of Reference have been established by the Minister for the Review Panel.

Amendment GC81, translates elements in the draft Framework by identifying:

- the preferred land use, form and intensity of urban development in each of the four mixed use precincts, including new floor area ratios and maximum height and setback controls; and
- potential key transport alignments and services and the preferred locations for public open space and community infrastructure.

Amendment GC81 seeks to make the following changes to the Port Phillip Planning Scheme:

- introduce new Planning Scheme Map Nos. 2DPO, and 3DPO to protect areas of strategic importance to ensure development achieves defined outcomes;
- introduce new Planning Scheme Map No. 1AEO and amend Planning Scheme Map Nos. 2EAO and 3EAO, requiring land within the Lorimer precinct to be remediated before a sensitive use commences;
- amend Planning Scheme Map No IEAO which provides guidance on development within the Port Melbourne interface;
- amend clauses 21.01, 21.02, 21.03, 21.04, 21.05 and 21.06 which relate to the Municipal Strategic Statement;
- replace Clause 22.15 with a new Clause 22.15 Fishermans Bend Urban Renewal Area Local Policy;
- replace Schedule 1 to Clause 37.04 CCZ with a new Schedule 1 which outlines land use and development outcomes for the Fishermans Bend Area;
- replace Schedule 30 to Clause 43.02 DDO with a new Schedule 30 which outlines built form controls;
- replace Schedule 1 to Clause 45.09 (PO) with a new Schedule 1 which sets maximum car parking rates to foster sustainable transport outcomes;
- introduce a new Schedule 2 to Clause 43.04 DPO to protect areas of strategic importance to ensure development achieves defined outcomes; and
- amend Schedules to Clause 61.03 and 81.01 which are consequential changes to the Amendment.

I have been instructed by Minter Ellison, on behalf of Submitter 202 to the GC81 Panel to provide expert evidence in relation to the transport engineering issues related to the implementation of GC81.
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in so far as it relates to the proposed mixed use development at 272-280 Normanby Road, South Melbourne.

2 Statement of Witness

2.1 Qualifications and Experience

My name is Charmaine Chalmers Dunstan. I am a Director of Traffix Group Pty Ltd practicing from Suite 8, 431 Burke Road, Glen Iris.

My qualifications and membership of professional associations are as follows:

- Bachelor of Civil Engineering (honours), Monash University, Clayton
- Masters of Traffic, Monash University
- Member, Engineers Australia (IEAUST)
- Fellow, Victorian Planning & Environmental Law Association

I have over 20 years’ experience as a Traffic Engineering and Transport Planning consultant with Traffix Group Pty Ltd and formerly Turnbull Fenner Pty Ltd. My experience also includes a number of local government appointments which involved acting in the role of Council’s Transport Co-ordinator or Senior Traffic Engineer.

I have experience and expertise in traffic management, transportation planning, road safety planning and engineering, parking management and strategy development, and development impact assessment of a broad range of land-use developments within established metropolitan, regional and growth areas.

2.2 Project Team

Leigh Furness (Senior Associate, Traffix Group) assisted with the review of the preparation of this statement and Matthew Woollard (Senior Traffic Engineer, Traffix Group) assisted with the preparation of this statement.

2.3 Scope of Work

This report provides an assessment of the potential traffic engineering impacts of Amendment GC81 of the Fishermans Bend Urban Renewal Area in so far as it relates to the live planning application for the proposed development at 272-280 Normanby Road, South Melbourne.

I have not reviewed the application plans in detail as this is not relevant to this hearing. Rather I have considered the car parking provision, access location and broader design considerations.

2.3.1 Key Tasks

Based on the exhibited documents and planning history of the site, the scope of my engagement has included the following tasks:
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- review of the site location and the surrounding transportation network,
- review of Amendment documentation and planning history,
- review of Council policies and other relevant documents, and

2.3.2 Experiments

I have visited the site to observe traffic and parking activity within the nearby area.

2.3.3 Reference Documents

The following key documents have been relied upon when preparing this report:

- Various Planning Scheme Amendment GC81 documentation,
- Relevant sections of the City of the Port Phillip Planning Scheme,
- Draft Fishermans Bend Framework (dated October, 2017),
- Fishermans Bend Integrated Transport Plan (dated October, 2017),
- Application plans for the proposed development prepared by Hayball (dated 19th January, 2018),
- Traffic Report prepared by TTM (dated May, 2016), and
3 Background and Proposal

As part of my instructions, I have been requested to review traffic engineering implications of Planning Scheme Amendment GC81 as it relates the live planning application for a mixed use development at 272-280 Normanby Road, South Melbourne.

The submitted application is for a mixed use development. A breakdown of the proposed uses on the site as well as the respective car parking allocation, based on the development summary included within the application plans, is provided within the following table.

Table 1: Development Breakdown

<table>
<thead>
<tr>
<th>Use</th>
<th>No./Area</th>
<th>No. of Car Spaces</th>
<th>Rate of Car Parking</th>
</tr>
</thead>
<tbody>
<tr>
<td>One-bedroom dwelling</td>
<td>56</td>
<td>215</td>
<td>0.74 car spaces per dwelling (Note 1)</td>
</tr>
<tr>
<td>Two-bedroom dwelling</td>
<td>176</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Three-bedroom dwelling</td>
<td>57</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residential Subtotal</td>
<td>289</td>
<td>215</td>
<td>0.74 car spaces per dwelling (Note 1)</td>
</tr>
<tr>
<td>Retail</td>
<td>784m²</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td>215</td>
<td></td>
</tr>
</tbody>
</table>

Note 1: I note that the car parking rate increases to 0.79 car spaces per dwelling when the affordable housing component of the development (17 dwellings) is not taken into account.

Car parking is provided over 5 levels (1 x basement level and 4 x podium levels).

Vehicle access is provided to Munro Street close to the site’s north boundary. The proposed vehicle access location is detailed in the following figure.
A total of 186 bicycle parking spaces and 2 motorcycle parking spaces are provided throughout the development.

A loading bay is provided within the ground floor, which incorporates a turntable.

This application was called-in by the Minister for Planning on 21st February, 2018 under Section 97 of the Planning and Environment Act 1987.

4 Subject Site and Proposed Controls

The subject site is an irregular shaped allotment with a street frontage to Munro Street of 23.1m, to Johnson Street of 76.6m and to Normanby Road of 80.8m.

The subject site is currently occupied by a restricted retail tenancy, Tradelink. Vehicle access is provided to Normanby Road and Munro Street (via two access points). A total of 13 car spaces are provided on the site, within an at-grade carpark.

A total of 20 on-street car spaces are provided along the site’s frontages, including 7 spaces along Normanby Road, 12 spaces along Johnson Street and 1 space along Munro Street.

A locality plan and aerial photograph are presented in Figure 2 and Figure 3.

Figure 4 and Figure 5 provide an extract from the proposed amended Clause 37.04 of the Port Phillip Planning Scheme detailing the location of the site with respect to the proposed road network and active street frontages.
Figure 2: Aerial Photograph of Site

Figure 3: Locality Plan
Figure 4: Map 1 Core and Non-Core Areas and Active Street Frontages

Figure 5: Map 2 Street and Laneway Layout
5 Site Access

Figure 5 details the proposed street network within the Fishermans Bend Urban Renewal Area. The site has frontages to Munro Street, Johnson Street and Normanby Road. The proposed alterations to the road network surrounding the site in so far as it relates to the subject site is discussed as follows.

**Normanby Road Frontage**

Under the proposed controls, no vehicle crossovers will be permitted along Normanby Road. Accordingly, access to this site will not be permitted to Normanby Road.

**Johnson Street Frontage**

Under the proposed controls to the Planning Scheme, a portion of Johnson Street will be subject to a road closure to provide for public open space along the site’s frontage. There is some inconsistency between Map 2 - Street and Laneway Layout (reproduced at Figure 5 above) and the Precinct Actions at Figure 19 on Page 71 of the Framework as it relates to the extent of the road closure area. Map 2 indicates that the road closure does not extend the entire length of the subject site and vehicle access may still be permitted to Johnson Street to the north-east of the road closure.

**Munro Street Frontage**

There are no proposed controls to limit access to the Munro Street frontage. The proposed development currently proposes access to the site via the Munro Street frontage and accordingly, the proposal for access is appropriate under the proposed controls.

I am satisfied that the Munro Street frontage remains the most appropriate location to provide access to this site. I also consider that the proposed road closure should be accurately reflected on Map 2 as this would have some bearing on the appropriateness of crossover locations for the site.

6 Provision of Car Parking

The proposed development would be subject to a revised Parking Overlay under Schedule 1 to Clause 45.09 (Parking Overlay).

A substantially revised Parking Overlay is proposed, which includes:

- Changes to car parking rates
- Changes to decision guidelines for car parking provision
- New design requirements for car parking
- Introduction of new requirements for car share vehicles, motorcycle parking and bicycle parking and decision guidelines for the non-provision of these parking forms.

There is no change to the extent of the Overlays and the Overlays continue to apply to Montague, Sandridge, Lorimer and Wirraway.
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I have provided detailed evidence on car parking matters in relation to Amendment GC81 for the Fishermans Bend Urban Renewal Area, which is outlined within my expert witness statement under instruction from Norton Rose (24408A#1 dated March, 2018).

I share these opinions as they relate to the applicable parking rates for this site and concerns regarding a number of the design standards.

Fundamentally, I find that the controls as exhibited to be unclear and/or contradictory and open to wide interpretation and that the controls need to be substantially re-worked.

One of the key changes relates to a maximum car parking rate for dwellings of 0.5 spaces per dwelling, compared with the current control of 1 car space per dwelling. There is a lack of clarity about under what conditions or circumstances a permit may be granted to exceed this rate of provision.

Notwithstanding this concern, the following table details the maximum car parking (without a permit to exceed) under the proposed Parking Overlay for the current breakdown of uses.

**Table 2: Statutory Car Parking Assessment – Clause 45.09 (Maximum Car Parking Spaces)**

<table>
<thead>
<tr>
<th>Use</th>
<th>Size/No.</th>
<th>Statutory Parking Rate</th>
<th>Car Parking Requirement (Note 1)</th>
<th>Car Parking Provision</th>
<th>Shortfall(-)/Surplus(+)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>One-bedroom apt.</td>
<td>56</td>
<td>0.5 car spaces to each dwelling</td>
<td>28</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Two-bedroom apt.</td>
<td>176</td>
<td></td>
<td>88</td>
<td>215</td>
<td>+71</td>
</tr>
<tr>
<td>Three-bedroom apt.</td>
<td>57</td>
<td></td>
<td>28</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Subtotal</strong></td>
<td><strong>215</strong></td>
<td><strong>+ 71</strong></td>
</tr>
<tr>
<td>Commercial</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail Premises</td>
<td>784m²</td>
<td>1 car space to each 100m² of gross floor area</td>
<td>7</td>
<td>0</td>
<td>-7</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td></td>
<td><strong>151</strong></td>
<td><strong>215</strong></td>
<td>+71 res -7 retail</td>
</tr>
</tbody>
</table>

Based on the current proposal, the development would require a permit to exceed the maximum parking rate for dwellings and provide 71 additional car spaces. The development does not require a permit to provide zero car spaces for the retail premises.

In my view, it is premature to apply a maximum car parking rate of 0.5 car spaces per dwelling within the Fishermans Bend Framework area and that the parking rates and expectations should not be more onerous than would apply under Parking Overlays for other Capital City Zone areas, where much greater access to public transport services is already available. There is not sufficient certainty regarding when public transport services will be extended into Fishermans Bend, especially metro rail services, to support a low rate of provision.
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I am satisfied that the Framework Plan and ITP place suitably strong emphasis the use of alternative modes and that it is not necessary to limit residential car parking below 1 car space per dwelling.

I have also formed the view that the rate of 0.5 cars per dwelling is substantially too low if there is a desire to have 25% of dwellings providing 3 or more bedrooms to accommodate families in this precinct. In this case 26% are proposed as 3 bedroom dwellings. Most families will require at least 1 car, even though it may not be used for work or school trips every day to meet their transport needs. Therefore, the maximum car parking rate for dwellings should remain as 1 car space per dwelling.

7 Requirements for a Car Parking Plan

Under the proposed Planning Scheme controls, Section 6.0 of Schedule 1 to Clause 45.09 requires the following in relation to alternative transport modes:

Share Cars

*Car parking spaces allocated to car share parking provided at a rate of 1 space per 60 car parking spaces or 1 space per 90 dwellings whichever is higher unless the responsible authority is satisfied that a lesser number is sufficient.*

Based on the above and the provision of 215 car spaces, the proposal requires 4 on-site car share spaces, unless Council agrees to a lesser rate. If the ‘maximum’ number of car spaces were to be provided on the site, 2 car share spaces would be required unless Council agrees to a lesser rate.

There are currently no share car spaces proposed as part of the application.

Car share is often best provided on-street or within commercial car parking structures so as to ensure that it is available to the broadest possible catchment. However, can potentially be provided within private developments such as this. The number of car share spaces provided within developments should be discretionary as a car share pod typically requires 30 “active” users to recover the costs and make an appropriate return for the company providing the service. Most car share users rely on alternative modes for the vast majority of their trips. Access to car share is meeting a ‘mobility gap’ between owning a car and needing a car on a semi-regular basis for trips that cannot be made by alternative modes.

It is unclear as to whether the controls requires the provision of funded car share vehicles or whether car share spaces are made available if the Owners Corporation generates sufficient demand for car share.

Motorcycle Parking

*Spaces allocated for motor-cycles at a minimum rate of one motor-cycle parking space for every 100 car parking spaces or 1 per 50 dwellings, whichever is higher, unless the responsible authority is satisfied that a lesser number is sufficient.*

Two motorcycle spaces are currently proposed as part of the application.

Based on the above and the provision of 289 dwellings on the site, the proposed development requires 6 motorcycle spaces (an increase of 4 motorcycle spaces unless Council agrees to a lesser rate).
Bicycle Parking

Spaces are allocated for bicycles at the following rates, unless the responsible authority is satisfied that a lesser number is sufficient:

- For residential development – a minimum of 1 bicycle parking space per dwelling and 1 visitor bicycle space per 10 dwellings.
- For non-residential development – a minimum of 1 bicycle parking space per 50 square metres of net non-residential floor area, and 1 visitor bicycle space per 1,000 square metres of net non-residential floor area.

The following table sets out the bicycle parking requirement for the proposed development based on the above rates.

**Table 3: Bicycle Parking Assessment**

<table>
<thead>
<tr>
<th>Proposed Use</th>
<th>Size/ No.</th>
<th>Bicycle Parking Rate</th>
<th>No. of Bicycle Spaces Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwellings</td>
<td>289</td>
<td>1 per dwelling</td>
<td>289 resident 29 visitor</td>
</tr>
<tr>
<td>Retail Premises</td>
<td>784m²</td>
<td>1 to each 50m² of NFA</td>
<td>16 employee 1 customer</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>335 spaces</strong></td>
<td></td>
</tr>
</tbody>
</table>

The development would need to provide a total of 335 bicycle spaces, including 305 bicycle spaces for residents and employees and 30 spaces for visitors and customers.

Accordingly, as 186 bicycle spaces are currently provided, an additional 149 bicycle spaces would need to be provided on-site to satisfy the requirements for bicycle parking. I would generally agree that a greater provision of bicycle parking for residents is appropriate (i.e. a rate of 1 bicycle space per dwelling) to encourage this mode.

Adaptable Car Parking Areas

There are a number of references in the controls to adaptable parking areas, including:

- Overlays – Clause 45.09 – Schedule 13 of the MPS and Schedule 1 in the PPS. Section 7.0:
  - Car parking areas should be provided within a building, fronted with active uses and not visible from the street, with a floor to floor height of not less than 3.8 metres.
  - Include provision for future conversion of car parking areas to alternative employment generating uses.
- Overlays – Clause 43.02 – Schedule 67 of the MPS and Schedule 3 in the PPS. Section 7.0:
  - Car parking areas not within a basement should have level floors and a floor-to-floor height not less than 3.8 metres (except for ramps) and should make provision for future conversion of car parking areas to alternative uses over time.
Buildings should be designed with:

- Whether parking areas are of a size and dimension that they can adapt to other uses over time.

I generally support the inclusion of controls that encourage adaptable parking areas for non-basement car parking, however, there are issues as to how this is achieved in practice. In this case, the floor to floor levels are 3.0m high and it is not practical to increase these without a significant lengthening of the ramps (as maximum ramp grades are already provided). There is also the question as to what ultimately fills these spaces and how pedestrian access to lifts and bicycle parking areas would work.

There clearly needs to be more flexibility as to how adaptable parking works and a decision made as to whether 3.8m (which is greater than typical residential floor to floor heights) is necessary as it has significant implications on any carpark design.
8 Conclusions

This report provides an assessment of the traffic engineering impacts of Amendment GC81 of the Fishermans Bend Urban Renewal Area in so far as it relates to the site at 272-280 Normanby Road, South Melbourne.

Based on my investigations, I am of the opinion that:

a) based on the proposed restrictions to vehicle access to the site's Normanby Road and Johnson Street frontages, the proposed vehicle access to Munro Street is an appropriate access location for the development,

b) the current proposal would seek a permit to provide an additional 71 car parking spaces under the proposed amended car parking overlay. The development would not seek a permit for the provision of 0 car spaces for the retail uses,

c) the development would require the following additional alternative transport modes on the site:
   i) an additional 4 share car spaces (based on a requirement for 4 spaces and the current provision of 0) – this rate is onerous and unlikely to be viable on-site and it is unclear as to what is required (allocation of car share spaces or car share vehicles?)
   ii) an additional 4 motorcycle spaces (based on a requirement for 6 spaces and the current provision of 2), and
   iii) an additional 149 bicycle spaces (based on a requirement for 335 spaces and the current provision of 186 spaces).

d) the parking overlay controls require a substantial review, including the wording, car parking rates and

e) the proposal to limit car parking for dwellings to a maximum rate of 0.5 car spaces per dwelling (without a permit) is inappropriate and unnecessary for the Fishermans Bend area, and the rate should remain as 1 car space per dwelling consistent with the current controls.

I have made all inquiries that I believe are desirable and appropriate and there are no matters of significance which I regard as relevant which, to the best of my knowledge, have been withheld from the Panel.

CHARMAINE CHALMERS DUNSTAN
B.E. (Civil) Hons., Masters of Traffic, M.IEAust., F.V.P.E.L.A