

Attachment 3 – Summary of Submissions – Local Planning Policy No. 7.7.1 – Non-Residential Development Parking Requirements

	Issue	Submitter	Administration Response	Recommended Modification
1.	Policy Structure & Application			
1.1.	<p>The submitter explained that the current adjustment factors are preferred as they take into account the availability of public transport and public parking spaces when the City determines the amount of parking that a development is required to provide. Concern was raised that without accounting for these adjustment factors applicants would be forced into providing excessive car parking.</p>	Submitter 2	<p>The City agrees that it is important to consider the surrounding factors such as the availability of public transport and public parking spaces. The advertised parking standards simplify the process of determining the parking required for a development by embedding the adjustment factors into the Car Parking Minimum standards in Table 1 for each Built Form Area. In addition the revised draft Policy will ensure that excessive parking is not permitted by including a Car Parking Maximum standard in Table 1. No modification is proposed to this approach.</p> <p>As a result of this submission the City reviewed the overall application of the draft Policy to development applications. It was identified that the change of use exemption may create a negative impact on the amenity of the surrounding area It was also identified that there may be circumstances where an application proposes an ancillary use that does not generate additional parking demand and it was unclear how these types of applications would be dealt with in a streamlined and flexible way.</p>	<p>To address the above issues it is recommended that the advertised Clause 1.1 and 1.2 be modified. The new Clauses require all non-residential development to be assessed against Table 1, unless an ancillary use which meets the prescribed requirements is proposed. If the requirements of Table 1 are unable to be met or the applicant is proposing a different amount of parking then the application will be assessed against a series of principles.</p>

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2.	Table 1			
2.1.	The submitter was concerned that the requirement for applicants to provide a Parking Management Plan (PMP) was onerous and would be a significant cost to developers.	Submitter 4	The City agrees that the reduced number of land uses in Table 1 may require applicants to prepare a PMP in many circumstances which may be overly onerous. It is proposed to introduce additional land uses in Table 1 to reduce the instances where a PMP is required and simplify the application process.	Include additional land uses in Table 1 in the appropriate categories.
2.2.	The submitter was concerned that Hotel and Motel land uses were grouped together in Table 1. Motels often generate a high demand for parking, whereas Hotel users are more likely to use alternative transport methods and as a result it is inappropriate to group these two land uses.	Submitter 2	The City agrees that 'Hotels' and 'Motels' may generate different parking requirements and it is recommended that Motels be removed from Table 1 as the parking generated from this use depends on its scale, intensity and location. Instead, an applicant would be required to provide a PMP and the City could then assess the proposal on its merits and determine the impact on the surrounding area. Hotels are proposed to remain in Table 1 as the parking requirement prescribed is still considered appropriate, however two parking requirements will be provided to clarify guests and visitors of hotels.	Modify Table 1 to delete 'Motel' and provide parking requirements for 'Hotel' split by spaces per bedroom and spaces per person.
2.3.	The submitter was concern about implications on small business and sporting venues. Sporting clubs have the same operational requirements as a small business. New developments often result in greater demand for parking space which puts pressure on existing facilities which is exacerbated by the City taking parking bays from the street to provide bike paths. The City needs to	Submitter 3	The City agrees that adequate parking needs to be provided for sporting clubs. The revised draft Policy has been aligned with the land uses in the City's Local Planning Scheme No. 2 and Table 1 now includes a parking requirement for 'Club Premises' which will provide a required baseline for sporting clubs.	Include 'Club Premises' in Table 1 of the revised draft Policy.

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	ensure there is adequate parking particularly for sporting clubs.			
2.4.	The submitter was unclear of the purpose of the “Car Parking Maximum” column in Table 1.	Submitter 5	The ‘Car Parking Maximum’ column in Table 1 allows the City to ensure that a development does not provide an oversupply of parking.	No recommended modification.
2.5.	The submitter suggested that Table 1 be amended to include a column for the Residential Built Form Area.	Submitter 5	<p>Agreed. The draft Policy is proposed to focus entirely on the parking requirements for non-residential development, including non-residential development proposed in the Residential Built Form Area.</p> <p>It is intended that development in the Residential Built Form Area be required to provide the maximum amount of parking onsite. This will ensure that non-residential development will have minimal impact on surrounding residential areas. Clause 1.1(c) in the advertised draft Policy explained this, however it is recommended that this clause be removed and the heading in Table 1 ‘Car Parking Maximum’ be updated to also include reference to ‘Residential Built Form Area Minimum’.</p>	Include “Residential Built Form Area Minimum” in the heading of Table 1 to clarify the parking requirement for non-residential development in Residential Built Form Areas.

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3.	Cash In Lieu			
3.1.	The submitter was concerned with the requirement to charge double the cash in lieu rate under Clause 3.2(f) for developments over three million. This is not supported as there is no clear justification.	Submitter 4 and 5	<p>The payment of cash-in-lieu is intended to reflect the cost of the City providing additional transport infrastructure to service the parking demand generated from the use and does not depend on the value of a development. It is not appropriate for a local planning policy to prescribe the fee to be paid as cash-in-lieu, rather the appropriated place to include the required fee is in the City's Fees and Charges, adopted as part of the annual budget.</p> <p>It is recommended that this requirement be removed from the advertised draft Policy. It is also recommended that the City's Schedule of Fees and Charges be amended to remove the requirement for double the amount of cash-in-lieu to be paid for large scale development and ensure that the cash-in-lieu rate is consistent for all development, regardless of its value.</p>	Delete Clause 6(f) in the Advertised draft Policy from the revised draft Policy.
3.2.	The submitter suggested that where it is demonstrated through a parking demand assessment that the parking required for a development is less than that specified in Table 1, the cash in lieu payment should be based on the parking demand assessment.	Submitter 4	<p>The City agrees that cash in lieu should be charged for the demonstrated parking demand.</p> <p>To clarify this position, it is recommended that the revised draft Policy allow applicants to demonstrate the parking demand in accordance with Clause 1.2. Cash-in-lieu is then calculated and collected on the agreed parking demand.</p>	Modify Part 2, Clause 1.2 to allow applicants to demonstrate the parking demand for each development. Delete Clause 3.2, paragraph one from the advertised draft Policy.

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3.3.	The submitter suggested that cash in lieu should only apply to proposed intensification of use.	Submitter 4	Where an existing development has been approved with a reduced number of parking bays in comparison to the number of parking bays required under the Policy this should be considered in the assessment of cash in lieu. Wording to this effect was included in Clause 3.2, paragraph two of the advertised draft Policy however it is recommended that the wording be modified to clarify this intent.	Modify Clause 3.2 paragraph two in the advertised draft into a new Clause 6.2 in the revised draft Policy.
3.4.	The submitter was concerned that the cash in lieu provision allows developers who fail to provide adequate parking to create further parking problems for residents using on street and public parking.	Submitter 6	The provision of cash in lieu allows the City to consider development applications that are unable to provide parking onsite. The City uses the collected cash in lieu to provide transport infrastructure that is intended to address the shortfall in parking demand. The City is currently reviewing the operation and application of cash-in-lieu of parking as part of a separate project under Item 4.10 of the City's Corporate Business Plan 2017/18 – 2020/21	No recommended modification.
4.	General Comments			
4.1.	The submitter suggested that reciprocal parking would provide greater benefit than purely evening and daytime or weekend and weekday.	Submitter 4	Agreed. The evening and daytime or weekend and weekday guidelines for reciprocal parking allow compatible land uses to share the parking where it is demonstrated that the parking demand is generated at different times.	No recommended modification.
4.2.	The submitter questioned the distinction between the Transit Corridor and Activity Corridor appears arbitrary.	Submitter 4	Activity corridors are intended to provide more commercial and mixed use development, whereas Transit Corridors are	No recommended modification.

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			intended to provide more residential development so the areas have different parking requirements.	
4.3.	The submitter was concerned that areas such as Carr Street, West Perth, are becoming clogged with parked cars and that verges will be paved. It was suggested that the Cleaver Precinct should have restricted parking for local residents.	Submitter 6	It is outside the scope of the draft Policy to suggest suitable restrictions in the City's precincts.	No recommended modification.
4.4.	The submitter suggested that the City create a multi-story car park behind the Leederville TAFE to enable people to park and access the train station.	Submitter 7	It is outside the scope of the draft Policy to suggest suitable sites for multi storey car parks.	No recommended modification.
4.5.	The submitter stated that Main Roads is currently undertaking a review of Charles Street and is developing a long term plan for upgrading the corridor.	Submitter 8	It is outside the scope of the draft Policy to address long term planning on Charles Street, however the City will continue to work with Main Roads on any development and planning surrounding Main Roads controlled roads.	No recommended modification.
4.6.	The submitter requested that draft policies be made available on the City's website.	Submitter 4	The draft Policy was available on the City's website during the advertising period. The advertised version is also available in the City's Agenda and Minutes web page.	No recommended modification.