

8th August, 2018

Chief Executive Officer
City of Vincent
PO Box 82
LEEDERVILLE WA 6902



Dear Sir

APPLICATION TO AMEND A DEVELOPMENT APPROVAL – CONDITION 4 (CAR PARKING) – 5/216 STIRLING STREET, PERTH

The following application is submitted in relation to a recent approval granted by the City of Vincent for a change of use from office to shop in relation to 5/216 Stirling Street, Perth (ref. no. 5.2018.180.1). The proposal involves amending condition no. 4 to reduce the cash-in-lieu contribution for car parking. Justification for the reduction is provided in the following submission.

The current condition requires a payment of \$13,176 based on a shortfall of 2.44 bays. It is requested that Council amend this condition to require a payment of \$5,400 based on a shortfall of 1 bay. The current condition is considered to be excessive for a small business located in an inner city area close to the Perth CBD, where public transport and active transport (walking/cycling) should be the primary means of transport. Also, there is an abundance of existing on-street public parking already available in the local area.

Car Parking Requirement as per City of Vincent Policy 7.7.1 – Non-Residential Development Parking Requirements

Under the Policy, a shop has a parking rate of 4 bays per 100m² NLA (net lettable area). In this case, the hair salon has a total floor area of 86m². However, 6m² comprises a tea room and toilet, which are able to be excluded from the NLA based on the definition included in the Policy.

Therefore, the total parking requirement is 3.2 bays minus the 1 existing bay for the office, which equals 2.2 bays. According to Council staff no previous variation was given for parking reductions for the office. This requirement is slightly lower than condition no. 4 which specifies a shortfall of 2.44 bays.

Other aspects of the policy, including the overall objectives, grounds for variation of the parking requirements and cash-in-lieu provisions are discussed in a later section of this submission.

Parking Occupancy Survey

A parking survey of the local area surrounding the site was undertaken on weekday – Friday, 20th July, 2018 and a weekend – Saturday, 21st July, 2018. The results are shown below in Table 1. Figure 1 shows the surveyed parking areas surrounding the site.

Figure 1: Local Public Parking Area

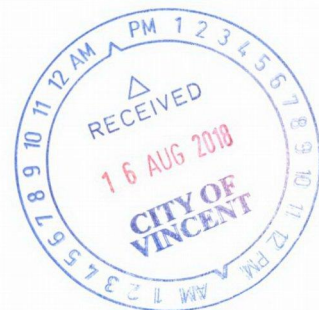
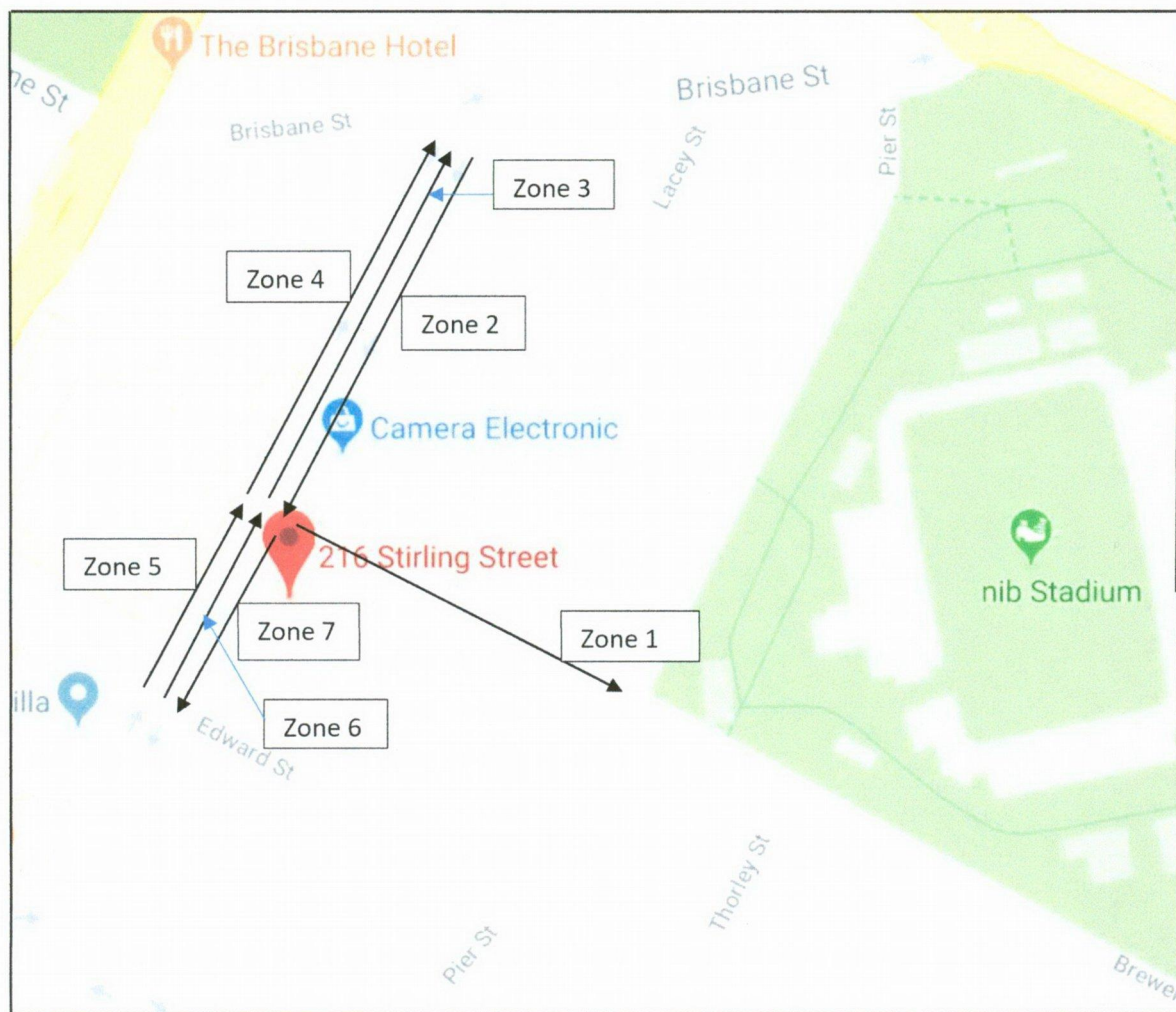
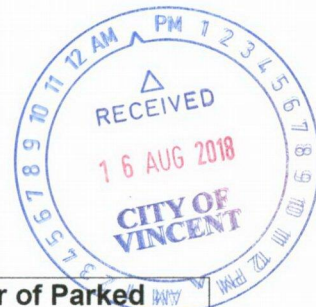


Table 1: Parking Survey Results



Zone	Number of Available Parking Bays	Number of Parked Vehicles Friday (20 th July) (12.50pm)	Number of Parked Vehicles Saturday (21 st July) (1.45pm)
1 (both sides of Brewer Street between Stirling and Pier Streets)	30	23	17
2 (eastern side of Stirling Street between Brisbane and Brewer Streets)	14	12	11
3 (central Stirling Street between Brisbane and Brewer Streets)	31	5	6
4 (western side of Stirling Street between Brisbane and Brewer Streets)	19	14	11
5 (western side of Stirling Street between Brewer and Edward Streets)	11	10	9
6 (central Stirling Street between Brewer and Edward Streets)	18	3	3
7 (eastern side of Stirling Street between Brewer and Edward Streets)	10	8	3

Grounds for Variation of Parking Requirements

Variation of the parking requirements for the hair salon (shop) is justified on the following grounds:

- In accordance with the first objective of Council's Parking Policy (supporting more active and sustainable transport modes), if less parking is provided (but not to the detriment of residents), it will influence travel choice and potentially encourage people to use more active and sustainable transport modes (in particular walking or the bus service along nearby Beaufort Street) and thereby reduce dependence on cars, which will benefit the local area by reducing traffic congestion. Condition no. 4 of the approval should not undermine the walkability and amenity of the area with more parking.
- Approximately 90% of the clients of the hair salon live in the local area (ie. Perth, Highgate and Mt. Lawley) who will most likely walk to the salon. If more parking is provided then this is less likely to occur. At the owner's current hair salon (which is also located in the City of Vincent), approximately 50% of the clients walk to the salon.
- The proposed shop (as defined in the Local Planning Scheme) is a boutique hair salon, which is likely to have a lower client turnover than a normal retail shop and even other hair salons that rely on more trade to remain viable. The peak trading day is Saturday, which only has a maximum of 10 clients and 2 staff during the summer months. The number of clients on a Saturday declines during winter to around 6. Therefore, the demand for parking is likely to be lower than a normal shop. Clients will spend much longer in a hair salon than a shop (eg. a hair colour treatment will take 2-4 hours, which

is longer than customers would usually spend in a shop). In other words, it's more about the experience than simply purchasing services or goods.

- Austroad (Guide to Traffic Management Part 11 - parking) questions the relationship between floorspace and parking demand. Austroads recommends that parking ratios be treated as a guide, which may be varied and applied flexibly based on circumstances. This is considered to be a reasonable approach and applicable in this case.
- In accordance with clause 1.2.2 of the Policy, which allows parking requirements to be varied based on certain criteria, there is an adequate provision of accessible and available public parking. As detailed in the parking survey, there is sufficient available on-street parking in both Stirling Street and Brewer Street, which has already been provided to cater for developments in the area. The on-street parking in the local area is in good condition and there is no obvious need for upgrading and therefore it is difficult to understand where cash-in-lieu contributions would be spent. The current policy provides little guidance, although it is understood that Council is in the process of preparing a policy which will provide guidance for spending cash-in-lieu.
- The use is for a small business with limited funds for the payment of parking. Many hairdressers operate from home (without planning approval) and are therefore not subject to the same costs and requirements. Small businesses should be encouraged to locate in commercial and mixed use areas but this is unlikely to occur if business operators are subject to high cash-in-lieu parking contributions.
- The business will add to the vibrancy and safety of the area. Condition no. 5 requires direct line of sight from the shop to the street, maximising passive surveillance.
- It will be an additional service for local residents.
- In accordance with the objectives of the Policy, the needs of users/clients are already met by existing on-street parking.
- The encouragement of active forms of transport (ie walking) reduces the carbon footprint, which is an objective of the City of Vincent Local Planning Strategy.

Therefore, based on the above grounds, it is requested that Condition no. 4 be amended to state 1 parking bay shortfall, requiring a cash-in-lieu contribution of \$5,400.

Personal details removed for confidentiality

Yours faithfully

Sue Vigolo

Personal details removed for confidentiality

