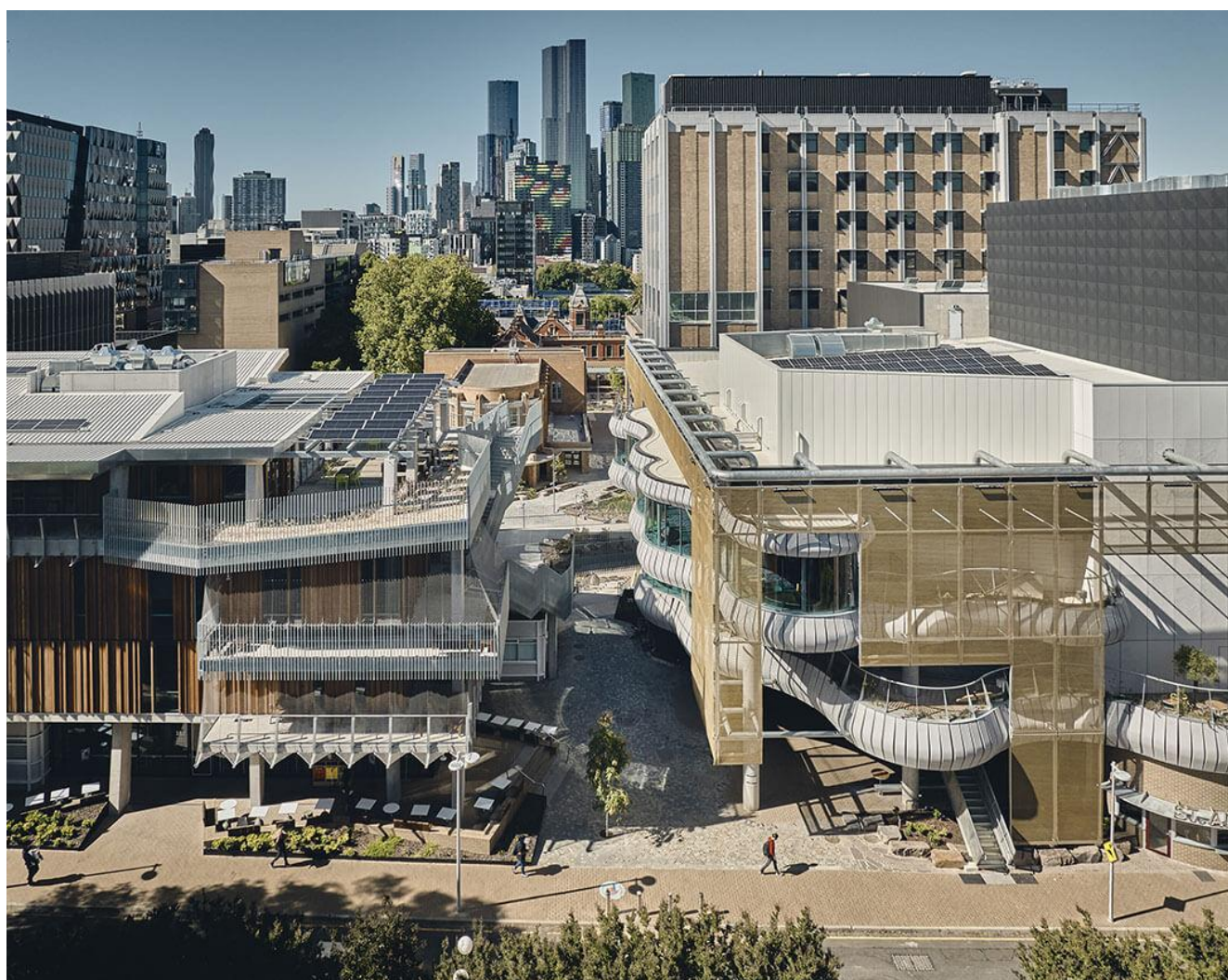


# MODERNISING BICYCLE AND CAR PARKING REQUIREMENTS



VICTORIAN DEPARTMENT OF TRANSPORT AND PLANNING

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Response to Modernising bicycle and car parking requirements - Discussion paper October 2023

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### About the cover photo

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# TABLE OF CONTENTS

<b>1</b>	<b>INTRODUCTION.....</b>	<b>2</b>
1.1	About this submission.....	2
1.2	Key messages.....	2
<b>2</b>	<b>DETAILED RESPONSE TO THE QUESTIONS .....</b>	<b>3</b>
2.1	Is PTAL appropriate for carparking?.....	3
2.2	A PTAL methodology for Melbourne.....	3
2.3	Removal of minimum car parking rates.....	3
2.4	PTAL in regional Victoria .....	4
2.5	Parking Overlay to remain in the planning scheme.....	4
2.6	Digital implementation.....	5
2.7	PTAL to determine bicycle parking and end of trip facilities.....	5
2.8	Minimum bicycle parking rates.....	6
2.9	New design standards for bicycle parking and EoT.....	6
2.10	Consolidating parking requirements.....	7

# 1 INTRODUCTION

## 1.1 About this submission.

This submission is made in response to the *Response to Modernising bicycle and car parking requirements - Discussion paper October 2023*. The Institute has advocated for many years to both the federal and individual state and territory governments on matters of planning, climate change, urban sprawl and urban liveability to which this submission relates. In making this submission, we respond below to each of the questions as they appear in the discussion paper and shown here in bold

## 1.2 Key messages.

Key messages in our responses include:

- Public Transport Accessibility Levels may not be readily transferable from the Transport for London methodologies, which appear to be underpinned by far more detailed analyses.
- Transferring car and cycle parking and end of trip requirements from an approach used in London to Melbourne may also prove difficult due to different city densities, geography and transport infrastructure.
- As the government attempts to encourage densification, and entice families to live in apartments, or other infill developments, this will be unsuccessful if households are unable to safely park a vehicle in close proximity to their dwelling or on-site. Melbourne is a large metropolis, and the ongoing need for car parking does need to be evaluated from the standpoint of those who rely on cars for work or non-work purposes.
- A parking provision should be available to administer by a council with the skill to develop a strategic plan that is flexible and robust to accommodate changing community needs. However, parking overlays should not be subverted by “NIMBY” counter pressure.
- People in anticipated lower PTAL areas (e.g. Eltham) have greater barriers and few enablers for cycling. Under-provisioning bicycle parking and EoT by gearing this to their PTAL seems entirely counter-intuitive to increasing the uptake of cycling as an active transport mode. To encourage cycling behaviour there needs to be a whole of government approach. Government should actively support measures to promote cycling, including:
  - cycle parking and EoT facilities,
  - secure bike parking at railway stations,
  - traffic separated bike lanes that link from outer suburbs to other cross suburb locations and a continuous safe cycling path to CBD and major urban hubs,
  - schemes for families to affordably access hire electric long tail bikes,
  - primary schools and communities establishing “walking school bus” and cycle to school programs to foster active transport from an early age.
  - public education campaigns for improving knowledge, attitudes and behaviours to achieve more cooperative and safer driving and cycling among vehicle drivers and cyclists alike
- Ultimately, the process needs to be a holistic assessment oriented towards the attainment of specific weighted outcomes. Accurately determining car and cycle parking requirements may be less about PTALs and more direct measures such as the local “park and ride” commuter behaviours of car drivers and cyclists who are using multiple transport modes.
- Different ways of provisioning should also be considered, such as car sharing, bike parking and end of trip facilities, rather than requiring each separate developed land use to provide this, especially if they are in close proximity to each other.
- Local consultation might be more practical to help determine required quotas. What is critical is that car or bike parking rates, especially in more public areas, are based upon an evidence based approach through audits (including peak versus nominal average use times) to establish and monitor whether provisioning is adequate.



## 2 DETAILED RESPONSE TO THE QUESTIONS

### 2.1 Is PTAL appropriate for carparking?

#### *Do you think PTAL is an appropriate way to apply car parking requirements?*

No. The PTAL process is based on walking distance to station not driving distance to stations. In Britain it is rare to have parking provisions at stations except village stations just inside the greenbelt. Commuters will make park and ride decisions on a range of factors.

In the Britain, people will drive from beyond the green belt to a station immediately inside to catch a metro train. Similarly, people in outer metropolitan Melbourne will drive from suburbs such as Diamond Creek or Eltham to Ivanhoe or Heidelberg to get travel in the cheaper Zone 1 ticket and quicker journey outside of peak road usage.

However, lines such as the Mernda line and Hurstbridge line stop at all stations to Clifton Hill (which is just on the outskirts of the CBD), whereas other lines, such as Belgrave/ Lilydale lines, have a third track and an extensive express route from Box Hill to Richmond so travel decisions factoring costs of petrol, train tickets and travel time will underpin different parking behaviours and parking requirements.

Moreover, the question remains, even if greater parking was to be strategically provided at park and ride nodes, whether this could be feasibly delivered as land is tightly held in these inner to middle suburbs and there is limited opportunity to expand at scale unless through compulsory acquisition or incorporating car parking within multi-level housing redevelopment on railway land adjacent to or over railway stations.

### 2.2 A PTAL methodology for Melbourne

#### *What do you think about the methodology used to define the suggested PTAL for Melbourne?*

The methodology has not been adequately defined in the discussion paper. The much more in-depth paper, published by Transport for London<sup>1</sup> and referenced in the discussion paper, highlights the complexity of the methodology and the subsequent algorithms (e.g. the use of habitable room densities). The *Modernising Car and Bicycle Parking Requirements* discussion paper examines it in a far different city context and there needs to be a more detailed presentation with case studies of how this would apply in the Melbourne and Victorian context. London has a very different and far more comprehensive public transport network, especially with respect to its urban underground and suburban surface rail system.

Moreover, British residential density levels within the green belt are not changing to the extent that they are in Melbourne or Melbourne's proposed densities. The densities in Britain are conducive to well supported public transport and have been consistent since the Second World War with green belt legislation since 1938 curtailing urban sprawl.

Policies to increase residential density around transport nodes in Melbourne should, for a given population, reduce car parking proportions if people reside within easy walking distance of a station.

### 2.3 Removal of minimum car parking rates

#### *Do you agree with removing minimum car parking rates in areas with a medium or high PTAL?*

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<sup>1</sup> Transport for London (2015) [Assessing transport connectivity in London](#).

No, Melbourne is still sparsely and poorly serviced for public transport compared to London, even in the most inner urban areas, due to the absence of a comprehensive underground – and despite our tram network. This is why the new rail loops are gradually being constructed. Melbourne’s rail and tram networks have largely been a hub and spoke model, with one single hub being the Melbourne CBD with almost non-existent cross-links of rail, light rail or tram that connects the spokes and different radial distances from the central point, much like the pattern of a spider’s web.

We acknowledge that since the 1950s, private bus operators have provided cross-town circumferential routes. However, the issues associated with frequency, number of stops and total journey time make the use of buses different to rail.

On the assumption of the validity of using PTAL, one might live, for example, in a high PTAL area but actually need a car to travel to another low PTAL location for work or study.

Melbourne’s constrained supply of affordable housing further reduces the choices people have to move or relocate near to work or study, which can often be in different locations. Unlike London or Paris, people in Melbourne still require cars. This is exacerbated if they have small children, are older and have difficulty accessing public transport or a tradesperson needing to transport tools and material.

Government attempts to encourage densification and entice families to live in apartments or other infill developments, could be diminished if households are unable to safely park a vehicle in close proximity to their dwelling or on-site. The Melbourne City Council introduced the requirement for residential development to require a permit to include parking provision. The ongoing need for car parking does need to be evaluated from the standpoint of those who rely on car usage for all purposes including work, business, education, caring, shopping and commerce, and social cultural and recreation activities throughout weekday and weekend cycles.

A further consideration are the spaces required for subscription-based hire schemes. These are already present in some kerb-side parking and apartment developments.

## 2.4 PTAL in regional Victoria

### *What do you think about implementing a PTAL-aligned approach in regional Victoria?*

It may be possible to apply PTAL to the suburban areas of regional centres (e.g. Ballarat, Bendigo) where it could be reasonably expected that a portion of users live within town. However, many people who work or attend school “in town” may also reside “out of town” in smaller towns or rural districts. Furthermore, not all areas are serviced by a school bus route. Therefore, accommodation for this type of car travel must be incorporated.

Given the Melbourne PTAL model is not developed fully, and Victoria’s development and geography are markedly different to England’s, it may be difficult and complex to apply in regional areas of Victoria.

Some regional centres – such as Ballarat and Bendigo – have become dormitory cities, with some residents undertaking daily commutes to the Melbourne CBD (and certainly intermediate towns on these routes, such as Bacchus Marsh and Kyneton). Determining car parking and even cycling parking requirements at these locations may be less about PTALs and more economically determined by a simple understanding of the “park and ride” commuter behaviour.

## 2.5 Parking Overlay to remain in the planning scheme

### *Do you agree that the Parking Overlay should remain in the planning scheme?*

Yes. A parking provision should be available to administer by a council with the skill to develop a strategic plan that is flexible and robust to accommodate changing community needs. However, it is critical that the implementation of the Parking Overlay is supported by provisions that support the functioning of orderly and proper planning for the community and are not subverted by “NIMBY” counter pressure.

## 2.6 Digital implementation

### What do you think about digital implementation of recommended rates through VicPlan?

This would seem sensible to do noting the relevant Public Transport Accessibility Level with a hyperlink to the parking rates for the proposed land use according to the new land use groups.

This is subject to validation of the working model for the parking rate itself.

## 2.7 PTAL to determine bicycle parking and end of trip facilities

### Do you agree that PTAL should be used to determine bicycle parking rates and EoT facilities for land use groups?

It is not possible to agree or disagree until PTAL is explained in detail.

Assuming PTAL was applied, in areas with high PTAL the question remains as to where and how people are using different modes of public transport and how these, in turn, interact with bicycle usage. Buses and trams, for example, do not provide for multimodal journeys as bus stops have no secure parking, and few buses have bike carriers, while bikes are not permitted on trams.

In inner suburban areas such as Northcote, Thornbury and Brunswick which would likely have high PTAL, there are visibly higher numbers of cyclists on the roads in some form of commuting. However, their presence may well owe more to the demographics of those suburbs and proximity to major universities than the public transport.

Notably, bike parking around train stations may not require as high provisioning as these cyclists are completing their entire journey into the CBD, Carlton or Parkville on bicycle without the use of public transport. Moreover, this is quite different to the eastern side of Melbourne, such as Glenferrie, Ivanhoe, or Surrey Hills, where cycling commuting is far easier due to the flatter terrain.

Greater research needs to be undertaken into people's daily travel patterns, especially given the marked increase in people working from home since Covid 19 – however, this also varies according to the types of employment in which people are engaged.

The premise of the changes proposed includes that they assist the move toward net zero carbon emissions and generate public health benefits. Cycling, as one mode of active transport that can help deliver these benefits, needs to be promoted, not discouraged.

People in anticipated lower PTAL areas (e.g Eltham) have greater barriers and few enablers for cycling. Under-provisioning bicycle parking and EoT by gearing this to their PTAL seems entirely counter-intuitive to increasing the uptake of cycling as an active transport mode. In outer suburban areas, for example, people may be less likely to complete an *entire* cycling journey into the CBD for work compared to someone in an inner suburban locality. However, they may be happy to ride to the station, reducing car parking requirements and local traffic congestion at peak times. Therefore, greater provisioning of secure bike parking at outer urban railway stations or transport hubs is required, rather than less.

To encourage cycling behaviour, there needs to be a whole government approach. Government measures to promote cycling could include:

- increasing provision of cycle parking and EoT facilities,
- ensuring secure bike parking at railway stations,
- constructing traffic separated bike lanes<sup>2</sup> that link from outer suburbs to other cross-suburb locations and provide a continuous means of safe cycling to the CBD and major urban hubs,

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<sup>2</sup> As distinct from recreational cycle pathways alongside rivers and creeks which are highly circuitous

- providing tax breaks and subsidy schemes for families with younger children to purchase or hire electric long tail bikes<sup>3</sup> as their alternate second vehicle – especially for commuting to childcare, kindergarten, schools and shops,
- Better support for primary schools and communities to establish “walking school bus” and cycle-to-school programs to foster active transport from an early age. There is an even greater opportunity for this to be exploited since Covid with more parents enabled to work from home, and
- Implementing public education campaigns to improve knowledge, attitudes, and behaviours to achieve more cooperative and safer cycling and driving among vehicle drivers and cyclists alike.

## 2.8 Minimum bicycle parking rates

### *Do you agree with proposed minimum bicycle parking rates?*

No. The rates are inconsistent with the points we have made above. Moreover, they are very non-aspirational. For example, a convenience (fast food) restaurant in an outer suburb (again using the example of Eltham) is staffed largely by teenagers without a driver’s licence, and its patronage at certain daily and weekly cycles can also be many unaccompanied minors (teenagers). The 1:10 provisioning for employees (assuming PTAL rated at “poor”) for employees means that young employees remain dependent on their parents to drive them to work rather than being able to cycle and securely park their bike. A similar scenario applies to community gyms, basketball centres and pools, often staffed by teenagers as front-of-house personnel, umpires and lifeguards.

However, EoT facilities need to be considered carefully. While generally practical in offices, in some settings such as shopping centres, public EoT facilities in poorly secured areas without adequate recorded video surveillance on persons entering/ exiting without secure entry control could be a risk for personal safety in relation to intruders who engage in predatory behaviours in these setting.

We also note that gyms and other sporting facilities already generally have the equivalent facilities to end of trip facilities in patron change rooms.

## 2.9 New design standards for bicycle parking and EoT

### *Do you agree with adopting new design standards for bicycle parking and EoT?*

Yes. However, long-term parking for bicycles (e.g. full day associated with places of education or work) should provision places with an accessible general power outlet (GPO) for recharging at greater than five percent. It should be noted that the layout of the parking, combined with average charging lead length and multi-socket GPOs, may mean that a few bikes could share one multi-point GPO. This would need to be in secure under-cover parking as fully publicly accessible parking could, unfortunately, be at risk of opportunistic theft or vandalism of chargers, charging leads etc.

It is good that high percentages of horizontal parks are contemplated. The more observably prevalent form of large format bicycle is not the Dutch cargo bike, but the previously mentioned “long tail” which can comprise a second motorcycle style bench seat, or one or two individual child seats.

Consideration should be given in some settings to parking for tricycles and recumbent trikes, which have a wider footprint than a bicycle. Tricycles may be used by some people who cannot ride a bicycle owing to some form of impairment that creates balance and coordination problems.

Securing bicycles often requires the user to carry heavy chains or large D-format locks. It would be advantageous from a cycling perspective if integrated securing elements such as a heavy gauge chain,

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<sup>3</sup> A Fitzroy based supplier of electric bikes currently hires a two child seat model for \$61 per week which otherwise cost in excess of \$7,000 to purchase.



or cable were included in racks which then only require the user to carry a standard locking device such as a key or combination padlock or where a user codable mechanical or electronic lock were included.

The location of parking must not create hazards for pedestrians nor adversely impact the public realm, such as street side cafés. There must be careful consideration to setting aside areas for bike parking and, over the longer term, increasing the width of footpaths to accommodate bikes alongside pedestrian traffic and other footpath uses.

## 2.10 Consolidating parking requirements

***What do you think about consolidating parking requirements within a single, streamlined statutory control for cars, bicycles and EoT facilities?***

The key question that may need to be addressed is the extent to which current provisions are working or otherwise. It is not clear that across all settings, allowing for different topographic, demographic and neighbourhood cultural characteristics, that this highly formulaic approach will be effective. It could lead to under-provisioning or overprovisioning. There needs to be some flexibility as there are a range of factors that will determine demand. Parameters that flexibly vary requirements (increase or decrease) should, therefore, be included.

Ultimately, the process needs to be a holistic assessment oriented towards the attainment of specific weighted outcomes. Local consultation might be more practical to help determine required quotas.

Also, different ways of provisioning could also be applied. These may involve car sharing, bike parking and EoT facilities within a given footprint rather than only considering separate developed land use on its own. For example, in a High Street situation of strips shops with mixed retail and hospitality/entertainment, rather than each separate business providing employee car parking, bike parking or cycling EoT facilities, councils might acquire parcels of land to provision these – within a reasonable walking distance – and paid for by development levies. This may help solve issues of High Street parallel parking competing with bike lanes as well as address shop owners' concerns about the potential loss of car parking and impact on patronage.

What is critical is that car or bike parking rates, especially in more public areas, are based upon an evidence-based approach through audits (including peak versus nominal average use times) to establish and monitor whether provisioning is adequate. This should also include determining if the land use is being adequately provisioned with the relevant parking and EoT with due regard for employees, visitors/users/patrons and residents.

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