

30 May 2023

Project No: 300304687

Pearlwit Pty Ltd  
 C/- Metropol Planning Solutions  
 8 Gold Street  
 COLLINGWOOD VIC 3066

**Attention: Michael Dunn**

Dear Michael

**RE: 718-724 Sydney Road, Coburg North  
 Proposed Amended Development – Transport Engineering Impact Review**

## 1. Background

A planning permit (MPS/2015/595) was issued in 2016 at the direction of the Victorian Civil and Administrative Tribunal (VCAT) for a proposed multi-storey residential and retail development at 718-724 Sydney Road, Coburg North. In 2020, an amended permit was issued (MPS/2015/595/A), which included some changes to the built form, a reduction in the number of apartments, and the change of use of some of the proposed residential apartments to serviced apartments.

Application is now being made to VCAT under Section 87A of the Planning & Environment Act for approval of a further amended development proposal. The amended proposal retains a similar building envelope to the most recently approved proposal, but with some changes to the layout. It is also proposed to make changes to the land uses. In particular, it is no longer proposed to have serviced apartments as part of the development. Also, the applicant has an agreement with a social and affordable housing provider such that all of the apartments within the development are to be owned and managed by community housing provider HousingFirst and will now be used for social and affordable housing, rather than the previous proposal where the apartments were to be sold at market rates for private housing. A comparison of the land uses in the originally approved, currently approved and proposed amended development proposals is provided in Table 1.

**Table 1 – Development Summary**

Description	Land Use	Original Approval (2016)	Current Approval (2020)	Amended Proposal (2023)
Apartments	Dwelling	50 x one-bedroom 89 x two-bedroom 1 x three-bedroom Total = 140 apartments	10 x one-bedroom 46 x two-bedroom 12 x three-bedroom Total = 68 apartments	111 x one-bedroom 30 x two-bedroom 6 x three-bedroom Total = 147 apartments
Serviced Apartments	Residential Hotel	None	54 units (including 28 dual-occupancy units)	None
Retail	Shop	266sqm (2 tenancies)	495sqm (3 tenancies)	147sqm (1 tenancy)
Office/Commercial	Office	None	None	173sqm (1 tenancy)

The currently approved development included 157 on-site car parking spaces within two basement levels. It is now proposed to provide 112 on-site car parking spaces within two basement levels, including 100 resident spaces, 5 residential visitor spaces, 5 spaces for office employees and 2 spaces for retail employees.

Access to the site is proposed via a double-width crossover to Sydney Road at the northwest corner of the site, consistent with the existing approval.

The currently approved development included a total of 74 bicycle parking spaces. It is now proposed to provide a total of 185 bicycle parking spaces, including 36 visitor/customer spaces, 12 employee spaces, and 137 resident spaces.

It is proposed to provide an on-site loading area near the northwest corner of the site, which will be accessed from the entrance driveway, consistent with the existing approval.

Stantec (formerly GTA) provided transport engineering services for the currently approved development. We have now been asked to review the amended proposal from a transport engineering perspective.

## 2. Car Parking Provision

### 2.1 Statutory Requirements

Statutory requirements for the provision of car parking are set out in Clause 52.06 of the Merri-bek Planning Scheme, with parking rates specified in Table 1 to Clause 52.06-5. As the site is within the Principal Public Transport Network Area, the rates in Column B of the table apply to this site. An assessment of the statutory parking requirements for the amended development proposal is set out in Table 2.

**Table 2 – Statutory Car Parking Requirements**

Description	Land Use	Size	Statutory Car Parking Rate	Statutory Car Parking Requirement
Apartments	Dwelling (Residents)	111 x one-bedroom 30 x two-bedroom 6 x three-bedroom Total = 147 apartments	1 space per one or two bedroom dwelling 2 spaces per three+ bedroom dwelling	153 spaces
	Dwelling (Visitors)	147 dwellings	None	0 spaces
Retail	Shop	147sqm (1 tenancy)	3.5 spaces per 100sqm	5 spaces
Office/Commercial	Office	173sqm (1 tenancy)	3 spaces per 100sqm	5 spaces
<b>Total</b>				<b>163 spaces</b>

The above assessment indicates that the approved development proposal has a statutory requirement of 163 car parking spaces, including 153 resident spaces, 5 spaces for the retail tenancy and 5 spaces for the office tenancy.

The proposed provision of 5 on-site car parking spaces for the office tenancy meets the statutory requirement. However, the proposed provision of 105 car spaces for the apartments and 2 car spaces for the retail tenancy does not meet the statutory requirements for these uses and a permit is being sought to reduce these requirements.

### 2.2 Disabled Parking Requirements

In addition to the statutory car parking requirements in the Planning Scheme, the National Construction Code (NCC) outlines requirements for the provision of car parking for people with disabilities. An assessment of the NCC disabled car parking requirements for the development proposal is set out in Table 3.

**Table 3 – Disabled Car Parking Requirements**

Description	NCC Class	NCC Disabled Parking Requirement
Apartments	Class 2	None
Shop	Class 6	1 space for every 50 car parking spaces or part thereof
Office	Class 5	1 space for every 100 car parking spaces or part thereof

Therefore, there is no requirement for disabled parking spaces for the apartments, and a requirement for 1 space for the retail and office uses. Parking spaces for people with disabilities can be included in the total number of spaces required by the Planning Scheme.

### 2.3 Car Parking Demand Assessment

#### 2.3.1 Decision Guidelines

With regard to not providing the statutory parking requirement on-site, the Planning Scheme indicates that a Car Parking Demand Assessment must assess the car parking demand likely to be generated by the proposal. The assessment must consider the following:

- *“The likelihood of multi-purpose trips within the locality which are likely to be combined with a trip to the land in connection with the proposed use.*
- *The variation of car parking demand likely to be generated by the proposed use over time.*
- *The short-stay and long-stay car parking demand likely to be generated by the proposed use.*
- *The availability of public transport in the locality of the land.*
- *The convenience of pedestrian and cyclist access to the land.*
- *The provision of bicycle parking and end of trip facilities for cyclists in the locality of the land.*

- *The anticipated car ownership rates of likely or proposed visitors to or occupants (residents or employees) of the land.*
- *Any empirical assessment or case study”*

The combination of these factors often results in car parking demand being generated at rates different to the statutory rates. An assessment of the likely car parking demand for each of the proposed land uses for which a reduction from the statutory car parking requirement is being sought, is presented below.

### 2.3.2 Resident Parking

As previously indicated, all of the apartments in the amended development proposal will be used for social and affordable housing. None of the apartments will be sold or let on a commercial basis at market rates.

Research indicates that car parking demand rates for social housing are typically lower than those for commercial housing. Indeed, a large study undertaken by Stantec (formerly GTA) in 2017 for the Department of Health & Human Services found an average car ownership rate of 0.64 vehicles per dwelling for social housing sites in the City of Merri-bek, and an average of 0.39 vehicles per dwelling for social housing sites in the middle metro areas as a whole. The surveys also found that car ownership rates were lower for residents of apartments than those in stand-alone houses, and that car ownership rates were lower for one-bedroom dwellings than for dwellings with two or more bedrooms.

Given that the proposed development is an apartment building, with a high percentage of one-bedroom dwellings, and is located adjacent to a tram line and within easy walking distance of a train station, it is likely to have lower than typical car ownership rates. Notwithstanding, conservatively adopting the average surveyed rate for social housing in Merri-bek of 0.64 vehicles per dwelling, the development could generate demand for up to 94 resident car parking spaces.

### 2.3.3 Retail Parking

The retail tenancy is likely to mostly attract customers from the local area, and hence most customers are not expected to drive to the site. Notwithstanding, based on the statutory requirements, the tenancy could generate a peak car parking demand of up to 5 spaces. This could be expected to consist of 2 employee spaces and 3 customer spaces.

## 2.4 Adequacy of Parking Provision

### 2.4.1 Resident Parking

Based on the above analysis, the proposed provision of 100 resident parking spaces is expected to be adequate to cater for the resident car parking demands generated by the proposed development.

Whilst there is no statutory requirement for residential visitor car parking, the provision of 5 spaces for residential visitor car parking will assist with accommodating any residential visitor car parking demands, and is 2 more spaces than provided for this use in the currently approved development. Any overflow of residential visitor car parking can be accommodated on-street in the vicinity of the site, noting that parking on Sydney Road is unrestricted outside of Clearway periods and parking is also available on Carr Street.

### 2.4.2 Retail Parking

The proposed provision of 2 employee parking spaces is expected to be adequate to cater for the retail employee car parking demands generated by the proposed development.

It is not proposed to provide any on-site car parking for retail customers. Any demand for retail customer car parking can be accommodated on-street in the vicinity of the site, noting that parking on Sydney Road is unrestricted outside of Clearway periods and parking is also available on Carr Street.

### 2.4.3 Summary

The amended proposal will provide an appropriate provision of on-site car parking for the proposed uses.

## 3. Bicycle Parking Provision

### 3.1 Statutory Requirements

Statutory requirements for the provision of bicycle parking are set out in Clause 52.34 of the Merri-bek Planning Scheme. Based on this, the statutory requirements for the provision of bicycle facilities for the amended development proposal are set out in Table 4.

**Table 4 – Statutory Requirement for Bicycle Facilities**

Use	Size	Statutory Rate		Statutory Requirement	
		Employee/ Resident	Visitor/Shopper	Employee/Resident	Visitor/Shopper
Dwelling	147 dwellings	1 space per 5 dwellings	1 space per 10 dwellings	29 spaces	15 spaces
Shop	147sqm	1 space per 600sqm if >1,000sqm	1 space per 500sqm if >1,000sqm	0 spaces	0 spaces
Office	173sqm	1 space per 300sqm if >1,000sqm	1 space per 1,000sqm if >1,000sqm	0 spaces	0 spaces
<b>Total</b>				<b>29 spaces</b>	<b>15 spaces</b>

In addition to the requirement for bicycle parking, Clause 52.34-3 of the Merri-bek Planning Scheme requires 1 shower for the first 5 employee bicycle parking spaces and 1 shower for each subsequent 10 employee bicycle parking spaces (if 5 or more employee bicycle parking spaces are required). However, as there is no statutory requirement of bicycle parking for the shop and office uses, there is also no statutory requirement for employee change rooms/showers.

### 3.2 Bicycle Parking Adequacy

The proposed provision of bicycle parking facilities for the amended development will greatly exceed the statutory requirements, and is significantly more than was proposed to be provided in the currently approved development proposal.

It is proposed to provide 36 visitor/customer bicycle parking spaces on the ground level along the southern side of the site. This exceeds the statutory requirement for residential visitor bicycle parking and will also accommodate any shop customers or office visitors.

It is proposed to provide a secure staff bicycle parking and storage room on the ground floor along the south side of the building, which will have 12 bicycle parking spaces. This generous provision is expected to be adequate to accommodate any bicycle parking demands from shop and office employees.

It is also proposed to provide a resident bicycle parking area in the Basement 1 level, which will include 137 bicycle parking spaces at a rate of 0.93 spaces per dwelling.

## 4. Car Park Layout

The amended car park design is similar to the currently approved design and is generally in accordance with the requirements of Clause 52.06-9 of the Merri-bek Planning Scheme and/or AS/NZS 2890.1:2004. Specifically:

- Most of the car parking spaces are 4.9m long by 2.6m wide, accessed from a 6.4m wide aisle. There are also some spaces which are 4.9m long by 2.8m wide, accessed from a 5.8m wide aisle. All of the dimensions comply with the requirements of Clause 52.06-9 of the Merri-bek Planning Scheme.
- The disabled car parking space is 5.4m long by 2.4m wide, adjacent to a 5.4m long by 2.4m wide shared area, in accordance with AS2890.6.
- Columns are located in accordance with Diagram 1 in Clause 52.06-9 of the Merri-bek Planning Scheme.
- Spaces are offset from adjacent walls / obstructions by at least 300mm.
- A 2m x 2.5m sight distance triangle will be provided on the south (exit) side of the site access point.
- The grade at the entrance to the site will be flat for a distance of at least 10m into the site.
- The basement entry ramp will be at least 6.1m wide between walls. The ramp will have a maximum grade of 1:4, with a 4m long section of 1:8 grade at the top of the ramp and a 2.4m long section of 1:8 grade at the bottom of the ramp.
- The ramp between the basement levels will be at least 6.1m wide between walls. The ramp will have a maximum grade of 1:4, with a 2m long section of 1:8 grade at the top of the ramp and a 2.4m long section of 1:8 grade at the bottom of the ramp.

## 5. Bicycle Parking Layout

Consistent with the currently approved design, all of the bicycle parking is proposed to be provided in horizontal Cora Expo 3606 and Expo 7510 racks. The bicycle parking space dimensions comply with the manufacturer's specifications, including 1.8m long spaces for bicycles and 1.5m wide aisles between the racks.

## 6. Loading & Waste Management

The proposed loading and waste collection arrangements are consistent with the arrangements for the currently approved development.

The currently approved development included a loading area near the northwest corner of the site, which would be accessed via the car park entry, and cater for trucks up to the size of a 6.4m small rigid truck. The amended proposal retains this arrangement.

Waste collection for the retail and office tenancies is proposed to occur from the loading area, utilising small waste trucks. Waste collection for the residential uses is proposed to occur from within the aisle near the bin room in the Basement 1 level, using 6.4m long small waste collection vehicles.

## 7. Traffic Impact

The Transport Impact Assessment report for the originally approved proposal (dated 29 July 2015) estimated that the original proposal would generate up to 68 vehicle movements per hour. This was based on expected peak hour traffic generation rates of 0.4 movements per dwelling and up to 0.5 movements per space for the spaces allocated to retail uses and visitors. Adopting the same rates for the currently approved development suggests that it would have generated up to 62 vehicle movements per hour.

Adopting these rates suggests that the amended proposal will generate up to 65 vehicle movements per hour, which is less than would have been generated by the original proposal, and similar to the currently approved proposal. Notwithstanding, this revised estimate is considered conservative on the high side, as the proposed car parking provision for the residential apartments is significantly lower than was provided in the original proposal and the currently approved proposal.

Therefore, the amended proposal is not expected to have any greater impact on the surrounding road network than either the original proposal or the currently approved proposal.

## 8. Summary

Based on the analysis and discussions presented within this letter, the following conclusions are made:

- The amended development proposal has a statutory car parking requirement of 163 spaces.
- It is proposed to provide 5 office employee car parking spaces, in accordance with the statutory requirement.
- The provision of 100 resident car parking spaces is expected to be adequate given that all the dwellings will be social and affordable housing (which generates less car parking demand than other types of housing), and the site is located adjacent to a tram route and within easy walking distance of a railway station.
- The provision of 2 retail employee car parking spaces is expected to be adequate to accommodate the retail employee car parking demands. Retail customers will be able to park on-street in the vicinity of the site.
- It is proposed to provide 185 bicycle parking spaces on-site, including 36 visitor/customer spaces, 12 employee spaces, and 137 resident spaces. This provision exceeds the statutory bicycle parking requirements.
- The car park design is generally in accordance with the requirements of Clause 52.06-9 of the Merri-bek Planning Scheme and/or AS/NZS 2890.1:2004.
- The proposed waste collection and loading arrangements for the amended development are consistent with the arrangements for the approved development.
- The amended proposal is not expected to have any greater impact on the surrounding road network than either the original proposal or the currently approved proposal.

If you have any queries regarding the above, please contact me on 0403 242 034 or at [david.graham3@stantec.com](mailto:david.graham3@stantec.com).

Yours sincerely

**Stantec Australia Pty Ltd**



**David Graham**  
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