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Our Ref:	G29210M-01C	Date:	Wednesday, 23 December 2020

8-12 Punt Road & 3-7 Wellington Street, St Kilda – Amended Plans Traffic & Parking Assessment

Further to your request, we have undertaken a review of the amended plans prepared by Warren Mahoney Architects, dated December 2020 with respect to the endorsed plans and existing Planning Permit PP227/2015/A.

As you would be aware, Traffix Group has been involved in the most recent Permit Amendment and Endorsement of Plans, including having provided expert traffic evidence at VCAT (by Jason Walsh).

Reference is made to the existing permit and the expert evidence presented at the most recent hearing.

Approved Scheme

The original town planning permit (PP445/2016) was issued by City of Port Phillip, at the direction of VCAT, permitting the development of the site for a mixed-use development which included 203 dwellings, retail premises and office use and a reduction in car parking provisions, subject to conditions.

In February 2019, plans were endorsed and an amended permit was issued to reflect changes / deletions of permit conditions.

In July 2019, a Section 87A Application was submitted for a revised scheme. The revised scheme reduced the parking provisions (including removing previously proposed podium parking) and increased the overall apartment yield. External access arrangements were relatively unchanged.

An amended permit was subsequently issued at the direction of VCAT and plans were endorsed most recently in September 2020.

Table 1 provides a summary of the endorsed development schedule.

Table 1: Development Scheme

Land Use		Endorsed Scheme
Residential (Main Site)	1 bed Dwelling	87 dwellings
	2 Bed Dwelling	140 dwellings
	3+ Bed Dwelling	25 dwellings
	Total	252 dwellings
Retail (Shop/Food and Drink)		480 m ²

The endorsed plans included the provision of car parking spaces in accordance with Condition 50 of the permit, allocated as:

- 184 spaces for residents (there was no specific allocation per dwelling type);

- 5 spaces to retail staff; and
- 5 car share spaces.

The endorsed plans included a total of 272 bike parking spaces and 12 motorbikes/scooters.

Access was approved and endorsed via two crossovers to Nelson Road at the site’s north-eastern corner.

A loading dock, facilitating an 8.8 metre truck, was accommodated at ground with a 4.0 metre clearance.

Proposal

Amended plans have been prepared by Warren and Mahoney Architects dated December 2020. They propose:

- An increase in the overall number of dwellings by 48 apartments and an amendment to the mix of dwellings (including fewer large dwellings and more smaller dwellings),
- A decrease in the retail tenancy floor area (to 211 square metres), and
- The inclusion of 1,199 square metres of gym area (a new use).

Table 2 provides a summary of the proposed development schedule and the changes from the endorsed drawings.

Table 2: Endorsed vs. Proposed Development Scheme

Land Use		Endorsed	Proposal	Net Change
Residential (Main Site)	Studio Dwelling	0 dwellings	53 dwellings	+ 53 dwellings
	1 bed Dwelling	87 dwellings	139 dwellings	+ 251 dwellings
	2 Bed Dwelling	140 dwellings	96 dwellings	- 44 dwellings
	3+ Bed Dwelling	25 dwellings	12 dwellings	- 13 dwellings
	Total	252 dwellings	300 dwellings	+ 48 dwellings
Retail (Shop/Food and Drink)		480 m ²	211 m ²	- 269 m ²
Gym (Commercial Component)		-	1,199 m ²	+ 1,199 m ²

The amended plans propose a total of 230 car parking spaces to be allocated as:

- 199 spaces for residents
- 2 space to the retail/shop/food and drink use (1 space per 100 square metres);
- 24 spaces to the gym, inclusive of staff and visitors; and
- 5 car share spaces.

The amended scheme provides a total of 342 bicycle spaces at ground and basements as a mix of horizontal and vertical rails.

A total of 12 motorcycle/scooter spaces are provided on-site.



Access remains via Nelson Road, however has been amended to include a ground level porte cochere for residents. Plans include an on-site loading dock catering for an 8.8m truck consistent with the endorsed plans.

Car Parking Considerations

Statutory Requirement

The car parking requirements for the proposed development are outlined under Clause 52.06 of the City of Port Phillip Planning Scheme.

The existing permit allows for a significant dispensation in the parking requirements (110 spaces), particularly related to residential parking (92 spaces) and retail parking (13 spaces).

The proposal changes the mix and number of apartments and also includes a gymnasium.

Gymnasium is an innominate use at Clause 52.06, meaning that parking must be provided to the satisfaction of the responsible authority.

An assessment of the amended proposal under Clause 52.06 is provided at Table 3.

Table 3: Car Parking Requirements

Land Use	No./Area	Rate	Req.
Residential Dwellings	288 no.	1 car space to each 1 and 2 bed dwelling	288 spaces
	12 no.	2 car spaces to each 3+ bed dwelling	24 spaces
Shop	211 m ²	3.5 spaces to each 100 square metres	7 spaces
Gym	1,199 m ²	Satisfaction of RA	-
Total			319 spaces

Based on the preceding the proposed scheme has a requirement to provide a total of 319 parking spaces, plus parking for the gym use to the satisfaction of the Responsible Authority.

The proposal includes a provision of 201 spaces to the residential dwellings and shop use, resulting in a shortfall of 118 spaces.

This is comparable to the existing dispensation.

The application also proposed to provide 24 spaces to the gym.

An assessment of the individual allocations is provided as follows, having particular regard to the existing permit requirements and suitability of parking for the gym.

Suitability of Parking Provisions

Permit Requirements

Condition 50 of the permit requires:

Prior to the occupation of the development, a car parking management plan must be submitted to and approved by the Responsible Authority. That plan should show the



allocation of spaces within the basement car park between the various uses that comprise the development, and must (unless otherwise approved by the Responsible Authority) provide:

- *not less than 184 spaces for residents (with tandem spaces allocated to the same dwelling);*
- *not less than 5 spaces for retail; and*
- *not less than 5 car share spaces.*

An assessment of the individual allocations is provided as follows.

Residential Allocations

The permit requires a minimum of 184 spaces for residents. There is no set allocation per individual dwelling.

The VCAT Decision contemplated that all tandem spaces would be allocated to larger apartments (all three-bedroom dwellings) and that the one and remaining two-bedroom apartments would be allocated the remaining pool of parking on demand. The decision contemplated a total provision of 134 car spaces for 231 one and two bedroom dwellings at an average rate of 0.58 spaces per apartment.

These rates acknowledged that the site is strategically positioned to support reduced resident parking provisions particularly because of its location in relation to public and active transport modes and nearby retail and employment uses.

Whilst this application includes additional apartments, there is a significant number of these which are now offered as studio apartments.

The number of larger apartments (three plus bedroom) has been significantly reduced.

Applying the previously contemplated rates to the change in mix (and including studio apartments in the ‘smaller’ apartment category) results in a requirement to provide:

Table 4: Application of Permit Rates to Amended Residential Scheme

Land Use	No./Area	Rate	Req.
Residential Dwellings	288 no.	0.58 car spaces to smaller dwellings	167 spaces
	12 no.	2 car spaces to larger dwellings	24 spaces
Total			191 spaces

Based on the preceding, the provision of 199 spaces for residents is in accordance with (in fact it exceeds) the rates accepted by VCAT for the endorsed development.

It is noted, however, that as there is a significant offering of studio apartments, simply adopting the previous rate is overly conservative.

2016 Australian Bureau of Statistics (ABS) Census car ownership data for ‘flats, units or apartments’ within the suburb of St Kilda and the Port Phillip LGA is provided in Table 5 for the range of apartment types.

It indicates that there is a considerable demand for smaller dwellings where or no parking is required. More specifically, it shows that less than half of studio apartments in the



suburb and municipality own a vehicle and that the average rate for studio apartments is less than that of one and two-bedroom apartments.

Table 5: ABS Car Ownership Statistics (2016)

Number of Cars	Number of Cars	St Kilda LGA	Port Phillip LGA
Studio	Average Car Ownership	0.4	0.5
	0 cars	70%	63%
One-bedroom	Average Car Ownership	0.7	0.8
	0 cars	37%	32%
Two-bedroom	Average Car Ownership	1	1.1
	0 cars	22%	17%
Three-bedroom	Average Car Ownership	1.4	1.4
	1 or less cars	49%	45%
Total	Average Car Ownership	0.9	1
	0 cars	30%	23%

The above data reinforces that simply applying the VCAT rate for the one and two-bedroom apartments to the studio apartments is overly conservative. It suggests that the likely demands for parking for the amended mix of apartments will be less than previously accepted.

In this regard, we are comfortable that the proposed parking allocations are appropriate and whilst there is an increase in dwellings, the provisions of resident parking are consistent with the approved permit.

Car Share

The proposal retains the previously required 5 car share spaces.

This provision is expected to be very high for a development of this nature, particularly when considering the existing car share on-street and in the area.

Whilst there will be an increase in the number of dwellings provided on-site, there will be no need for additional car share on-site, as the current permit requirements would already cater for this level of demand.

Accordingly, the provision of 5 spaces remains appropriate.

Retail Parking

The permit approves parking for the retail uses at a rate of 1 space per 100 square metres for staff.

The proposed provision of 2 spaces for staff, related to the 211 square metres of retail use continues to meet the approved rate.

It is noted that the reduction in retail floor area will result in a reduction in the overall demands on-street associated with visitors.



Gym Parking

The NSW RTA Guide to Traffic Generating Developments suggests parking provisions for gymnasiums ranging from 3.0 spaces per 100 square metres for a gym located within a central business district to 4.5-7.5 spaces per 100 square metres for sub-regional areas.

Case study data held by Traffix Group identifies that depending on the size and operator, stand alone gymnasiums in metropolitan Melbourne would typically generate parking at a rate of around 3.0-4.0 spaces per 100 square metres.

Given the location of the site, it is expected that this gym will generate parking at a rate at the lower end of the scale.

We note that this site will have a reasonable catchment provided directly on-site, being future residents of the dwellings above and existing high density developments in the immediately surrounding areas. This is likely to contribute to further reduced visitor parking demands.

Access to multiple public transport modes and well established bicycle infrastructure, and on-site bicycle parking provisions, will support both staff and visitors to access the site via modes other than public transport.

We expect that the allocation of 24 spaces for the gym equates to a provision of 2 spaces per 100 square metres. This will allow for the expected staff demands and some, if not all, visitors to be accommodated on-site.

In any case, the reduction in retail floor area and associated reductions in on-street parking reliance, will offset (at least in part) any additional visitor demands which might be experienced by the proposed gym.

Summary of Parking Adequacy

Based on the preceding, the proposed parking provisions are considered acceptable as:

- Residential parking is provided in accordance with the rates established within the VCAT decision from the previous permit.
- The change in the mix of apartments, including a higher proportion of smaller apartments and inclusion of studio apartments, suggests that the demands may be lower than contemplated by the existing permit parking rates.
- The provision of 5 car share spaces continues to be appropriate.
- Parking for the gym and retail uses is expected to meet the majority of demands (and all long term staff demands) and therefore appropriate.
- The reliance on on-street parking is expected to be comparable to that of the endorsed plans.

Other Considerations

Car Park Design

We have undertaken a preliminary review of the car parking layouts and are comfortable that the designs are, or can be, made to comply with the relevant standards and requirements under Clause 52.06 and/or AS2890.1:2004 as required.



Parking compliance and detail could be addressed through condition of permit and/or refinement of the plans.

Traffic Considerations

Based on the traffic generation rates adopted for the previous permit, the additional 15 residential parking spaces will result in an increase of up to 5 residential vehicle movements generated by the proposal in a peak hour.

For the purposes of this assessment, we will assume that the 24 gym spaces will generate traffic at a rate of 0.5 movements per space in the peak hours. Allowing for the reduction in retail staff spaces (of 3 spaces), the gym could generate up to 10 additional movements in the peak hours.

Ultimately, the proposal could be expected to generate up to 15 additional vehicle movements to the road network when compared to the endorsed scheme.

This is equal to an average of one additional vehicle every 4 minutes in a peak hour from that most recently approved.

It should be noted that prior to the latest permit amendment, the traffic generation of the proposal was considerably higher as the residential and retail parking allocations were higher.

Accordingly, we are comfortable that the level of traffic generated by the amended scheme will not have a materially different impact on the operation of the surrounding road network and can be accepted.

Bicycle Parking

The bicycle parking requirements have been assessed under Clause 52.34 in the table below.

Table 6: Bike Parking Requirement

Land Use	No./Area	Rate	Req.
Residential	300 no.	1 resident space to each 5 dwellings 1 visitor space to each 10 dwellings	60 resident spaces 30 visitor spaces
Shop	211 m ²	1 staff space to each 300 sq m 1 visitor space to each 500 sq m	1 staff spaces 0 visitor spaces
Gym	1,199 m ² (~12 staff)	1 staff space per 4 employees 1 visitor space to each 200 sqm	3 staff spaces 6 visitor spaces
Total			60 resident spaces 4 staff spaces 36 visitor spaces

The above demonstrates that the proposal has a requirement to provide a minimum of 100 spaces, inclusive of 60 resident spaces, 4 staff spaces and 36 visitor spaces.

The provision of 342 bicycle spaces well exceeds the minimum statutory requirements, allowing for at least 1 bicycle space per dwelling and will also meets the minimum staff and visitor provisions of four and 39 spaces, respectively.



Bicycle parking has been provided in accordance with AS2890.3-2015 with a mix of vertical and horizontal rails as follows:

- Wall mounted vertical rails are dimensioned at 1.2 metres deep spaces, 0.5 metres spacings, and are accessible from an aisle 1.5 metres wide; and
- Horizontal rails are provided with dimensions of 1.8 metre length and spaced at 1.0 metre centres, accessible from a 1.5 metre aisle.

Loading Arrangements

The proposal remains consistent with the endorsed plans in providing a dedicated on-site loading bay, accommodating an 8.8 metre Medium Rigid Vehicle with a 4.0 metre clearance at ground level.

