

To:	Paul Lewis (Tract)	From:	Carlo Morello (Traffix Group)
Our Ref:	G32742M-06E	Date:	Friday, 22 November 2024

342-348 & 368-370 Victoria Street, Brunswick Proposed Mixed Use Development Traffic Engineering Assessment of Change of Use Scheme

Further to your request, we have undertaken a review of the proposed mixed use development at 342-348 & 368-370 Victoria Street, Brunswick dated August 2024.

Our traffic and parking assessment is as follows.

History of the Site

Permit

In July 2018, a Town Planning Permit (P703/2023) was issued by City of Merri-bek, at the direction of VCAT, for the redevelopment of the site at 342-348 & 368-370 Victoria Street, Brunswick. The Permit allows for the development of a multi-storey mixed use building and reduction in the car parking requirements.

The permit was amended in September 2023 at the direction of VCAT for a modified scheme, subject to a number of conditions (MPS/2017/745/A).

Plans for Endorsement

Plans for Endorsement were prepared by Fieldwork dated 15th April 2024 and submitted to Merri-bek for endorsement.

The April 2024 scheme is provided at Table 1.

Table 1: Condition Compliant Scheme – Development Summary

Use	Type	Number
Residential	Studios	19 dwellings
	One-bedroom	83 dwellings
	Two-bedroom	131 dwellings
	Three-bedroom	35 dwellings
	Subtotal	268 dwellings
Commercial	Office	3,965 m ² NLA
	Retail	1,339 m ² NLA
	Assemble Community	104 m ² NLA
	Subtotal	5,408 m² NLA

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Car Parking and Vehicle Access

The development access was approved via a ramp off the Victoria Street, located approximately 25 metres from the hold line to existing railway line. The bus stop on Victoria Street is to be relocated.

The approved scheme included the provision of 91 car spaces within a single basement level. The traffic report and Car Parking Management Plan submitted with the April 2024 Endorsement Scheme contemplated parking would be allocated as follows:

- 82 car spaces for residents (0.31 car spaces per dwelling),
- 5 car spaces for commercial uses (at a rate of 0.1 car spaces per 100 square metres of commercial floor area, including of 1 DDA space), and
- 4 car share spaces.

Bicycle Parking Provisions & Allocations

The approved scheme included the provision of 518 bicycle spaces, allocated as follows:

- 406 resident spaces (348 spaces within the basement and 58 spaces within the lobby areas within each of the individual building at ground floor),
- 56 visitor spaces (28 double sided horizontal hoops) within the public realm,
- 56 office/retail staff spaces within a dedicated End of Trip facility located within Building 3 at ground floor.

End of Trip facilities are proposed on-site for staff, inclusive of 4 showers and changerooms with 44 lockers provided for commercial staff located.

Proposed Amended Plans

An amended set of development plans prepared by Fieldwork (Revision Q, dated November 2024) shows the removal of commercial land use on level 1 for more residential apartments.

The key change from a traffic/parking perspective is that it would result change in the parking requirements, however there is no change to the total number of car spaces provided.

The access arrangements (including to bicycle parking in basement and at ground) and waste management arrangements will remain generally as approved.

The proposed layout of the basement car park remains generally consistent with the endorsed scheme. No changes are proposed in this regard.

A comparison of the endorsed and proposed amended scheme is provided at Table 2.

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Table 2: Comparison of Endorsed and Proposed Amended Schemes

Use	Type	Endorsed	Amended	Change +/-
Residential	Studios	19 dwellings	25 dwellings	+ 6 dwellings
	One-bedroom	83 dwellings	86 dwellings	+ 3 dwellings
	Two-bedroom	131 dwellings	136 dwellings	+ 5 dwellings
	Three-bedroom	35 dwellings	37 dwellings	+ 2 dwellings
	Subtotal	268 dwellings	284 dwellings	+16 dwellings
Commercial	Office	3,965 m ² NLA	2,186 m ² NLA	- 1,779 m ² NLA
	Retail	1,339 m ² NLA	1,338 m ² NLA	- 1m ²
	Assemble Community	104 m ² NLA	250 m ² NLA	+146m ² NLA
	Subtotal	5,408 m² NLA	3,774 m² NLA	-1,633 m² NLA

Appropriateness of Amended Car Parking Provisions

Clause 52.06 Requirements

The permit already allows for a reduction in the car parking provisions pursuant to Clause 52.06 of the Planning Scheme.

The proposal would increase this reduction for the residential component of the parking allocation, however, in our view, the outcomes would not be fundamentally different to those already approved.

A summary of statutory car parking requirements of the proposal is provided at Table 3.

Parking allocations are included in the table for information purposes but ultimately will be addressed and managed through the approval of the Car Parking Management Plan under Condition 35.

It is noted that the “Assemble Community” will be utilised by residents and has been treated ancillary to the development.

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Table 3: Statutory Parking Requirements – Clause 52.06-5

Use	Type	No/ Size	Statutory Requirement		Provision	
Residential	Studios	25 dwellings	1 space per dwelling	25 spaces	82 spaces	
	One-bed	86 dwellings	1 space per dwelling	86 spaces		
	Two-bed	136 dwellings	1 space per dwelling	136 spaces		
	Three-bed	37 dwellings	2 spaces per dwelling	74 spaces		
	Subtotal	284 dwellings		321 spaces		
Commercial	Office	2,186 m ²	3.0 spaces per 100m ²	65 spaces	5 spaces	
	Retail	1,338 m ²	3.5 spaces per 100m ²	46 spaces		
	Subtotal	3,770 m² NLA		111 spaces		
Car Share			No requirement		4 spaces	
				Total	432 car spaces	91 spaces

Relevant Permit Conditions & Council Discussions

In considering the reduction in the residential parking provisions, it is relevant that the existing permit does not include a requirement to provide a minimum number of car spaces onsite. Rather, it includes Condition 35 which requires that:

Before the development is occupied, a Car Parking Management Plan to the satisfaction of the Responsible Authority must be submitted to and approved by the Responsible Authority. When approved, the Car Parking Management Plan will be endorsed and will form part of this permit. The Car Parking Management Plan must address, but not be limited to, the following:

- A) *The allocation of car and bicycle parking between the uses, having regard to the demand generated by the uses.*
- B) *End of Trip Facilities that meet the requirements of Clause 52.34.*
- C) *Where possible visitor bike parking should be located at ground level, or otherwise conveniently accessible within other levels for visitors*
- D) *Confirmation that the design of the car parking is to comply with Clause 52.06 and/or AS2890.1 or as otherwise justified to the satisfaction of the responsible authority,*
- E) *Details for the management of the car park access including the design and location of any entry / exit barriers, leasing arrangements and security. The provisions, recommendations and requirements of the endorsed Car Parking Management Plan must be implemented and complied with to the satisfaction of the Responsible Authority*

In not setting a minimum parking provision, the permit contemplates that there could be changes to the development scheme and proposal that might result in a reduction in parking.



Whilst it may not have considered the extent that is currently proposed, the absence of a minimum parking provision, and the current wording of Condition 35, allows for flexibility in the development provisions at the discretion of Council.

That is, a change to the existing permit would not be required to support the amended development plans.

Discussions with Council's Engineering Team during the 2023 Amendment Application suggested that Council was not overly concerned in relation to a reduction in on-site parking for residents, provided that sufficient bicycle and car share parking was provided.

State Government Parking Rates

The State Government has recently announced (in March 2024) that it is considering removing minimum parking requirements for residential developments in areas of good public transport accessibility, and introducing maximum rates where appropriate.

This would be considered to be within an area of high access to public transport, and would certainly qualify to remove the minimum residential parking provisions applicable under the Planning Scheme.

Proposed Allocations and Considerations of Further Reductions

The total number of on-site car parking proposed is not proposed to change under the amended scheme. However, the total number of dwellings is increased by 16.

That is, there would be 16 fewer dwellings with a car space.

The parking allocation rate for the commercial use (rate of 0.13 car spaces per 100 square metres of commercial floor area) would increase from that originally proposed (and/or agreed with Council through the approval of the Car Parking Management Plan under Condition 35).

We are of the view that the additional 16 dwellings without a car parking space can be supported on the following basis:

- This site has excellent public transport with multiple fixed rail opportunities including a railway line running along the boundary and tram access to the east and west as well as supporting bus routes in the precinct.
- The location of the site being within the Brunswick Activity Centre offers a significant opportunity to be much less reliant on car parking as there is direct access to everyday services and amenities, including shopping, medical, banking, entertainment etc, all within 200 metres of the site.
- Future residents can, and will, enjoy the benefits of inner city living and have little or no need for a private car.
- The reduction of residential parking would be consistent with Merri-bek's approach (and also the State Government's approach) to implementing strategic policies that encourage active transport modes by reducing parking provisions and requirements for new developments in areas close to public transport and in and around activity centres.
- Generous provision of bike and end of trip facilities (allowing for approximately 10% of staff to ride and the majority of residents) will allow for a significant shift away from cars to support the reduced provisions which aligns with Government and State policy.



- The Built to Rent to Own Model will still be maintained which would allow the Building Managers to manage an ongoing rental pool for individual lease by residents on demand. This allows for efficiencies in the management and allocation of parking, supporting the potential for reduced demands and provisions.

Importantly, the allocations of car parking for the different uses can continue to be addressed through discussion with Council and the approval of an updated Car Parking Management Plan required under Condition 35.

Bike Parking

There is small increase in the overall bicycle parking provisions proposed by the amended scheme. With consideration that there is a reduction in commercial areas, and an increase in dwellings, it is proposed to reallocate one of the ground level stores to the residential dwellings.

This is essentially 1 additional bike space per additional dwelling.

Overall, there would therefore be an allocation of 417 bike parking spaces for residents across basement (318) and ground (99).

This equates to an average rate of 1.47 spaces per apartment, which is comparable with the Endorsed Scheme.

This reallocation will leave 40 spaces for staff, equating to a provision rate of 1.13 spaces per 100 square metres, which exceeds the previous rate of provision for the commercial uses.

On this basis we are comfortable an appropriate amount of parking is provided for residents and staff.

Traffic Considerations

In relation to traffic, the traffic generation of this proposal is directly related to car parking provisions.

Since there is no change to the on-site car parking provisions, this will have no impact in overall traffic generated by the amendment when compared to the approved endorsed scheme.

Design Considerations

We have undertaken a review of the proposed car parking design and are generally comfortable that it provides an acceptable outcome in relation to providing fit for purpose parking for residents and staff.

The design of parking remains in accordance with the Endorsed Plans and the requirements of Clause 52.06 and/or AS2890.1:2004 (where relevant).

On this basis, the design can be accepted.

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Conclusions

Based on the preceding, we are of the view that the removal of commercial floor area for an increase in residential dwellings is acceptable on the basis that:

- The permit does not include any minimum parking provisions, and therefore the approval of the provisions and allocations can be at the discretion of Council and addressed through an updated Car Parking Management Plan as required under Condition 35; and
- The commercial parking provisions won't be reduced, and a reduction in residential apartments with an allocated car space is acceptable when considering the location of the site, its access to public transport, and the strategic policies adopted by Merri-bek and the State Government to reduce unnecessary car ownership and traffic congestion in inner city areas.
- A reallocation of parking will allow provisions and rates per dwelling and commercial floor area to be maintained, consistent with the Endorsed Schemes.

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