



Melbourne City Council Draft CBD Parking Plan (including Docklands)

Submission

Prepared by Secure Parking

Executive Summary

Secure Parking welcomes Melbourne City Council's (MCC or Council) opportunity to comment on the Melbourne Draft CBD Parking Plan (including Docklands).

Melbourne has changed faster than most Australian cities. In the past five years it has experienced its biggest surge in population since the 1960s, putting massive strain on the public transport system. With more than 500,000 cars on Victorian roads than 10 years ago, there is every indication that people will remain captive to the automobile.

Looking to the future sustainability of Melbourne and the community's environmental responsibility, user behaviour will be central to the changes we need to adopt beyond the current political and community imperatives.

Five years ago, Melbourne City Council launched their 2030 vision strategy which is now undergoing its first review. This strategy was designed to set behavioural and infrastructure targets for the future of Melbourne.

The next phase of Melbourne and Victoria's development includes the review and programming of infrastructure requirements. Sir Rob Eddington's report released more than a month ago has divided the experts and government. His \$18 billion plan predicts that public transport's share of trips would remain at 9% by 2031. While the centre piece of his plan is to link Melbourne's east and west, principally by building an 18- kilometre road tunnel connecting the Eastern freeway with the western suburbs, and a \$7 billion rail tunnel linking Footscray to Caulfield. These proposals along with the mixed use requirements of the CBD will require a delicate balancing act from government and the community.

Essentially there are three issues that dominate the community's thinking:

- Firstly, the anxiety related to climate change and the collective need for long term measures to counter carbon emissions activity;
- Secondly, to address the adverse affects of recent population growth on the existing infrastructure and the need for to review and implement an integrated strategy based on the variety of user profiles and long term growth;
- and finally a pathway for collective thinking.

The role parking plays within this mix is critical to maintaining the vibrancy of Melbourne.

The parking landscape in Melbourne at present includes:

- A three year old 'Parking Congestion Levy' which taxes each car space and is currently paid for by either the building asset owner or the parking operator (or both).
- There is currently an oversupply of parking in Melbourne's CBD and the levy is not able to be passed onto customers through increased parking rates and at present is being absorbed by the asset owners or parking operators.
- The government (Victorian State Treasury and Melbourne City Council) have collected \$100 million from 50,000 car spaces during this time.

The effectiveness of the Parking Congestion Levy on reducing congestion and carbon emissions is yet to be realised. CBD congestion must be considered within a set of broader issues than parking alone. State and local government have recently announced additional funding which acknowledges that the issue of congestion is broader than end trip behaviour.

"Two weeks ago the Premier announced a \$112 million "congestion plan" that would lengthen clearway times to "ease congestion in the short term" on Melbourne's roads," The Age. 14/5/08

Secure believes that a broader approach to congestion management and transport user behaviour will need to be looked at as part of an integrated strategy.

The role parking plays within this strategy provides many opportunities for changing behaviour, and reducing carbon emissions while meeting the growing needs of Melbourne's international city status.

Melbourne is at a cross roads of growth. Now is the time for decisions to ensure that Melbourne handles that growth in a smart sustainable way. After much discussion with our stakeholders we recommend the City address the following points:

Recommendations:

1. *There should be a thorough review of the congestion levy including extensive market research to determine its effectiveness on the number of cars who park in the congestion zone.*
2. *Providing further options for parking and a review of dynamic signage should assist in reducing congestion within the congestion levy zone.*
3. *The City should discontinue trying to regulate price through Section 173 type of agreements.*
4. *There is no need for the city to provide off-street parking. Council should commence the process to privatising its two off-street facilities.*
5. *Develop dynamic perimeter signage to direct parkers to the closest available car park to reduce congestion. Investigate additional technology solutions in conjunction with perimeter signage including PDA/GPS/radio frequency options.*
6. *Parking guidance signs should be primarily for off-street parking locations.*
7. *Alignment of the specific clauses of the Melbourne Planning Scheme and Melbourne City Council local planning frameworks with environmental building standards such as the Australian Building Greenhouse Rating (ABGR) and Greenstar Building rating scheme. Where the planning mechanism is controlled by Victoria State Government for building above 25,000 square metres, the planning guidelines should be amended to reward or incentivise sustainable practices.*
8. *Reduce on-street parking, to either widen footpaths for cycling, pedestrian or for tram use.*
9. *Work with private operators to create loading zone hubs serviced in off-street car parks.*
10. *Provide incentives for parking operators, asset owners/managers and tenants to support and encourage sustainable transport choices e.g. spaces for green cars, scooters, motorcycles and bicycles*
11. *Council should not be in the business of providing off-street parking. Council should investigate alternate options for future revenue sources.*
12. *Council will receive information regarding vacancies via the updated dynamic signage to direct vehicles into available car parks.*
13. *Trial of effective CBD parking programs in Docklands high to medium density commercial and residential areas to manage behaviour changes and parking supply.*
14. *Trial of proposed CBD parking solutions in Docklands to assess effectiveness.*
15. *Construction and or fit-out of fully automated residential and commuter car parks in the Docklands to manage around the clock parking requirements.*

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Issue 1: The Parking Limitation Policy

Sec 53: "...Moreover, the actual cost of the levy is not yet being passed on to consumers – rather it is being borne by car park operators and owners

A3.1 Monitor the impact of the congestion levy

The effectiveness of the Parking Congestion Levy on reducing congestion and carbon emissions is yet to be realised. CBD congestion must be considered within a set of broader issues than parking alone. State and local government have recently announced additional funding which acknowledges that the issue of congestion is broader than end trip behaviour.

"Two weeks ago the Premier announced a \$112 million "congestion plan" that would lengthen clearway times to "ease congestion in the short term" on Melbourne's roads," The Age. 14/5/08

Secure believes that a broader approach to congestion management and transport user behaviour will need to be looked at as part of an integrated strategy.

The congestion levy is inequitable in that the tax is specifically targeted at one industry. Coupled with this is Council's provision of parking in its two off-street facilities that charge below market rates. These car parks not only encourage car use into the city but also put downward pressure on car park prices of the car park operators whilst the levy is forcing the price up squeezing car park operators at both sides of the equation.

Whilst parking prices have gone up demand has fallen, therefore to attract customers operators have been forced to again lower prices. Thus the effect of the levy is primarily on the operator rather than its original focus being on reducing congestion.

Secure would like to encourage Melbourne City Council to utilise the proportion of funds they receive from the congestion levy to the development of integrated parking solutions in Melbourne CBD and the Docklands.

A1.1 Establish a stronger relationship with the State Government regarding how car parking proposals are assessed.

Sec 56. "The issues to be discussed with the State Government should cover a full range of development approval issues affecting future major developments located within the State Government's congestion levy boundary. This is the area within which the Government has declared parking to be a root cause of congestion."

All proposals for the future development must also consider car parking. Car parking is not the root cause of congestion; however, inadequate parking certainly contributes to congestion. As pointed out in D 1.2 cars that can not find parking make a series of left turns in search of parking. This in turn means extra cars on the road contributing to congestion.

Adequate parking and an upgrade of dynamic signage can assist in getting cars to their end destination quicker than circling looking for a spot. The provision of parking is essential in future developments to avoid further congestion in the levy zone.

Sec 67: The City of Melbourne should therefore discontinue the practice of trying to regulate the price of parking through these (Section 173) type of agreements

Car parking is best owned and operated by businesses that specialise in the industry.

We agree that the City should discontinue trying to regulate price through Section 173 type of agreements.

Recommendations:

- 1. There should be a thorough review of the congestion levy including extensive market research to determine its effectiveness on the number of cars who park in the congestion zone.*
- 2. Providing further options for parking and a review of dynamic signage should assist in reducing congestion within the congestion levy zone.*
- 3. The City should discontinue trying to regulate price through Section 173 type of agreements.*

Concern 2: The Operation of Short Term Parking in the CBD

Sec 71: So as to achieve low-cost, short-stay parking policy, the City of Melbourne has:

- Restricted on-street parking within the CBD usually to a time period of three hours duration or less
- Kept charges for on-street parking at below comparable off-street rates
- Provided below market rate parking at two off-street facilities, and;
- Established a shoppers discount scheme operating on weekends that includes cheaper parking fees

To cater for shoppers and visitors to the city Secure agrees with the City's view to restrict parking to a period of three hours. This will increase turn over to make it easier for visitors throughout the day to find parking.

Keeping fees below off-street rates will encourage on-street parking. It is still important to keep off-street parking to service the retailers of the city.

There is no need for the city to provide off-street parking. Particularly in a market which is both oversupplied and also has a congestion levy on parking. As previously stated parking providers are being squeezed on both sides. Prices are being forced up by the \$820 per annum congestion levy. On the other hand prices are being pulled down by Council operating two car parks at below market rates. Council should commence the process to privatising its two car-parks.

Sec 81: "...Experience in recent years indicates that there are multiple possibilities for the signs to fail or to fail to display the correct information. The continued use of the signs needs review."

The car parking industry is becoming increasingly technologically driven. Over recent years Secure has invested millions in technology upgrades. We can provide live information on parking availability at any of our car parks.

Secure is willing to work in conjunction with the City to re-develop dynamic LED signage to direct vehicles into parking stations with available parking. New technology upgrades should assist in a more accurate service being provided.

Sec 92: “The City of Melbourne should change the purpose of parking guidance signs from displaying information about all available car spaces to only displaying information about short stay-spaces considered to be of low cost...”

Having parking signs help to reduce all forms of congestion. Directing cars into only short-term parking will neglect cars trying to find long term parking. Private operators with up to date technology can be part of the solution as outlined above to provide live information to direct cars into off-street parking locations in a way that does not discriminate for short or long term parking.

Moreover short-term parking will primarily be street based. Not only will it be very difficult to create technology listing the number of available spaces on a street but then pin pointing them and presenting this information with a low cognitive load will be nearly impossible. Drivers will instead spot street parking as they are driving around.

Recommendations:

- 4. There is no need for the city to provide off-street parking. Council should commence the process to privatising its two off-street facilities.*
- 5. Develop dynamic perimeter signage to direct parkers to the closest available car park to reduce congestion. Investigate additional technology solutions in conjunction with perimeter signage including PDA/GPS/radio frequency options.*
- 6. Parking guidance signs should be primarily for off-street parking locations.*

Concern 3: Further Planning for the future

Sec 101: “By 2020 it is anticipated that up to 30% of the 4000 publicly available on-street parking spaces will be required for other uses...”

- As the CBD grows, greater on-street space will be required to meet the demands of delivery vehicles
- Spaces for specific users such as car-share schemes. The City of Melbourne currently provides some parking spaces for car-share vehicles”

Secure agrees with City’s re-allocation of street use as outlined to improve the amenity and access to the city.

In relation to the demands of delivery vehicles off-street parking providers can make available spaces for loading zones within their current facilities. Parking operators could continue to provide off-street parking and easily allocate spaces for the 1489 loading zones with strict time limits within existing parking stations. In conjunction with Council, spaces at appropriate parking stations could be converted into loading zones and offered free of charge to commercial vehicles for the same time they are available at the moment. When this time limit expires the vehicle would be charged by the parking operator in a similar manner to the way Council issues these vehicles a fine.

Commercial parking operators can be part of the solution when it comes to finding space for community vehicles. Secure Parking would welcome an ongoing relationship with a car share program. Parking operators can continue to work with the City on similar initiatives regarding car share and car pooling.

Sec 108: “...These spaces could be provided by City of Melbourne on-street or by private operators in off-street facilities.”

Secure agrees and is more than willing to work with Council in providing facilities for off-street parking of Motorbikes.

This point will also relate to Sec: 110, 113 & 114. To encourage parking operators, asset owners/managers and tenants to support and encourage sustainable transport choices (spaces for green cars, scooters, motorcycles and bicycles) the City could investigate amendments to planning laws (Clause 22:06) that specifically encourage and where appropriate incentivise new and retro fitted developments to incorporate sustainable transport options for building tenants.

This partly could come down to aligning the Melbourne Planning Scheme and Melbourne City Council local planning frameworks with environmental building standards such as the Australian Building Greenhouse Rating (ABGR) and Greenstar Building rating scheme. Where the planning mechanism is controlled by Victoria State Government for building above 25,000 square metres, the planning guidelines should be amended to reward or incentivise sustainable practices including materials, sustainable schemes, lighting, carbon offset, energy use, recycle and water capture and reuse facilities as listed by national environmental building schemes. Secure Parking would encourage Council to work in consultation with commercial operators, developers and the business community to ensure that any amendments are practical and consider long term implications.

The Council may also wish to consider a program incorporating the Australian Government’s Green Building Fund initiatives which will offer assistance for energy-efficient retro-fitting of existing buildings and support for training initiatives to improve the skills of building operators.

Recommendations:

- 7. Alignment of the specific clauses of the Melbourne Planning Scheme and Melbourne City Council local planning frameworks with environmental building standards such as the Australian Building Greenhouse Rating (ABGR) and Greenstar Building rating scheme. Where the planning mechanism is controlled by Victoria State Government for building above 25,000 square metres, the planning guidelines should be amended to reward or incentivise sustainable practices.*

C1.2 Investigate the acquisition of off-street spaces for short-stay parking

Council should not be in the business of providing off-street parking. Car parking is best owned and operated by businesses that specialise in the industry.

Instead of looking to parking being an alternate source of income Council should investigate alternate options for future revenue sources.

Recommendations:

- 8. Reduce on-street parking, to either widen footpaths for cycling, pedestrian or for tram use.*
- 9. Work with private operators to create loading zone hubs serviced in off-street car parks.*
- 10. Provide incentives for parking operators, asset owners/managers and tenants to support and encourage sustainable transport choices e.g. spaces for green cars, scooters, motorcycles and bicycles*
- 11. Council should not be in the business of providing off-street parking. Council should investigate alternate options for future revenue sources.*

Concern 4: Information and data

120: “...The City of Melbourne has 14 agreements with car park operators under Section 173 of the Planning and Environment Act. It is understood that all include provisions that require operators to regularly provide data to City of Melbourne regarding the vacancy rate and number of short-stay parking spaces available to the public.”

As earlier Secure believe the City should stop enforcing Section 173 type agreements. The information relating to parking vacancy will be provided by the dynamic perimeter signage to direct cars into available parking stations.

Recommendations:

- 12. Council will receive information regarding vacancies via the updated dynamic signage to direct vehicles into available car parks.*

Concern 5: Management of On Street and Off Street Parking Spaces in Docklands

Current development of the Docklands is only one third of the way complete. The rest is being developed in stages, based on market demand, over the next 15 years. It will become Melbourne's new playground, residence, workplace and waterfront.

This staged process is designed to ensure consistent community development patterns and to establish needs and environments that meet and encourage this growth. Now is the time to tackle the teething problems.

Demand for commuter parking in the Docklands area is already reaching a critical point for business and office workers who are located in the Batman Hill and Victoria Harbour precincts. Parking resources in the Docklands area needs to be reviewed along with integrated transport planning resources to meet the growing demand for this area.

Docklands provides the opportunity to run trials of CBD parking proposals within the Draft Parking Plan to assess effectiveness. Docklands can be the testing ground for future initiatives that could be implemented in the CBD including loading zones hubs in car parks, end of trip facilities for cyclists.

While the lessons we are learning in the CBD can be transferred to Docklands so that we don't have the same problems in the future.

Recommendations:

13. *Trial of effective CBD parking programs in Docklands high to medium density commercial and residential areas to manage behaviour changes and parking supply.*
14. *Trial of proposed CBD parking solutions in Docklands to assess effectiveness.*

Sec 136: "...Commercial off street car parking facilities close too early in the evenings. This is the case with smaller car parks when evening demand isn't strong enough for them to remain open."

Secure is open to working with the city on an ongoing basis to make Docklands more accessible.

Secure recommends the implementation of flexible operating hours to meet both commercial and residential requirements for parking operators in the Docklands.

Operators should also investigate permanent residential parking bays and visitor parking options to cater for residential development controls of private parking resources in response to the limited metered on street resources already at capacity.

Full automation of off-street parking resources will provide the appropriate solution to 24 hour parking resource provision.

Resources need to be appropriately divided to meet the demand of user population when Docklands master plan is complete.

Recommendations:

15. *Construction and or fit-out of fully automated residential and commuter car parks in the Docklands to manage around the clock parking requirements.*