

Submission to the Car Parking Advisory Committee

Stephen Rowley

Background

I am an urban planner with over ten years of experience at local government, having worked at the Mornington Peninsula Shire, City of Melbourne, and the Moreland City Council. These have predominantly been statutory planning roles, although I have spent some time on strategic planning projects as well. I also worked in the Planning Systems Reform Team at DPCD from March 2009 to September 2010, where my work focussed on planning systems reform, with a particular emphasis on the VPPs. During that time I worked on the drafting of the planning controls responding to the parking advisory review.

Problems with the Current System

Reviewing the car parking controls is of paramount importance as these are possibly the most dysfunctional single provision in the Victorian planning system. They add considerable regulatory and economic burden for dubious planning benefit.

This is because:

- They hinder development and normal turnover of uses, especially in established strip shopping centres.
- They mean new businesses that would otherwise be as-of-right (notably Section 1 Uses in a Business 1 Zone) need a permit, hindering the operation of the zones.
- They encourage a “more-is-always-better” approach to parking provision, which leads to poor urban design outcomes.
- They are poorly targeted, with no attempt to exempt sites that are in already built up, close to transport, or too small to accommodate parking.
- They encourage futile site-by-site assessments rather than regional approaches to parking provision.
- They effectively tax developers and new businesses to create a subsidy to driving.
- They do not foster a co-ordinated management of planning approvals and on-street parking supply management.

There has been clamour for review of these controls since at least the mid 1990s and the failure to do so stands as an indictment of successive governments and ministers.

Positives from the Current Draft

The current draft has several clear virtues compared to the previous controls:

- The alignment of various rates, and the elimination of the need for a permit if the parking demand has not increased, will considerably reduce regulatory burden.
- Recognition of issues such as urban design will help to reduce the current “more-is-always-better” emphasis of the controls.
- Mapping parking precinct areas through an overlay is a positive initiative.
- The logic of a parking assessment is more clearly outlined.
- The new rates are generally likely to be an improvement on the current rates.

The first point alone will considerably reduce the damage currently being done by the planning controls.

Given this, and the ridiculous extent of delay that has occurred in reviewing these controls, it is crucial that these controls be implemented as soon as possible. While I argue below that there is much further work to be done, this should not hinder the immediate implementation of the current draft.

Fundamental Difficulties with the Current Review

The current review largely skims over the fundamental question of whether minimum parking controls are an appropriate planning tool. There is no detailed literature review or consideration of best practice in other jurisdictions.

This is despite the considerable doubt about the efficacy of the approach. In particular, I draw the committee’s attention to Donald Shoup’s *The High Cost of Free Parking* (Chicago & Washington: Planners Press, 2005). This is a scathing indictment of minimum car parking controls as a planning tool, and the failure to engage with this research – the key text in the field, and to my knowledge largely unchallenged by other researchers – is a fundamental failing of the current review.

The review should also more strongly encourage the co-ordination of land-use planning and on-street parking management (through parking permits, parking restrictions, and meters). We currently treat these as largely independent issues, and see any attempt to co-ordinate planning approvals with on-street parking management (for example by using approving permits conditional upon limiting access to residential parking permits) as illegitimate. Effective management of parking issues requires co-ordination of the different tools at Councils’ disposal, and such co-ordination should be encouraged rather than frowned upon.

It is also noted that the empirical basis for the revised parking rates is fundamentally dubious, being essentially based on an opinion poll.

Conclusion

The current review's finding should be immediately implemented to help ease the considerable problems created by the current controls.

However, the committee should recommend a further review that:

- Properly considers the efficacy of minimum parking rates as a policy measure.
- Includes a detailed literature review and consideration of best practice in other jurisdictions.
- Encourages a co-ordinated management of off-street and on-street parking.
- Provides empirical basis for revised parking rates, if minimum parking rates are maintained.
- Undertakes a detailed analysis of exemptions for sites where minimum parking rates are not appropriate (such as small sites and existing-premises), if minimum parking rates are maintained.

Thank you for considering my submission.

Stephen Rowley