

Darebin Parking Permit Policy

Peer Review

Final Report

Prepared for: **Darebin City Council**

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Revision

Revision	Date	Comment	Prepared By	Checked By
A	6 February 2023	Final	N McCracken	C Coath



Neale McCracken

For and on behalf of

Stantec Australia Pty Ltd

Acknowledgement of Country

In the spirit of reconciliation, Stantec acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present, and extend that respect to all Aboriginal and Torres Strait Islander peoples.

Limitations

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Appendix A. Parking Permit Policy Review

Executive Summary

Purpose of a Parking Permit Policy

A parking permit scheme controls and manages access to on-street parking in residential streets where competition for parking is high.

There are a variety of reasons for this legacy issue, including the planning requirements of the day and a historic trend of increasing car ownership over the past 40+ years. This has led to a need to manage on-street parking where it previously wasn't a problem.

The purpose of the policy is to set a baseline for Council providing car parking for dwellings that had limited or no access to car parking at the time the policy was originally made.

For Darebin, this baseline has been set at 20 December 2004 – the “2004 rule”.

In line with this purpose, a parking permit policy should be clear and ensure:

- Council will continue to manage the needs of parking for those that it previously did so.
- Council will not take on the responsibility of providing and managing parking for new developments.

This places the responsibility of providing parking on developers and the decisions on what is enough parking on residents. Council must presume due diligence is being carried out by these parties.

- Developers of properties that would not have access to parking permits will market the property with whatever amount of parking they believe will attract prospective residents.
- Prospective residents must decide if the parking that will be available at a dwelling is suitable for their needs, including any visitor parking.

Findings and Recommendations

Our findings are set out below and are based on our peer review of the draft Darebin Parking Permit Policy which was provided to Stantec on 13 January 2023.

- Do not introduce the ability for residents of any dwellings that do not meet the 2004 rule to gain access to permit parking.
 - To do so would be inconsistent with the purpose of a parking permit scheme.
 - Introducing the ability for people to own more cars is also inconsistent with councils' wider objectives and policies on climate change and sustainability.
- People facing extenuating circumstances should have a primary means of applying for a parking permit without undue delay.
 - The current policy places decisions on extenuating circumstances in the “Appeals” process. This should be remedied in an updated version of the policy.
 - Given social stigma/security risks that are associated with some of these circumstances (escaping domestic violence, emergency accommodation etc.), we consider can be dealt with by applying for a resident permit.
- The policy should adopt a consistent means of determining the area to which permits apply. We recommend that the coverage area applied to resident parking permits, whatever that may be, should be applied to all permit types.
- The sustainable transport incentive is a positive initiative; however, further consideration by Council is required to establish the fair value of the incentive in view of the value residents forego by not taking up parking permit rights.
 - The value of the incentive should be based on the value of the parking space, application fees and administration costs.
 - Distributional equity matters can be addressed by providing residents with a broader choice for using the sustainable transport incentive to support their individual needs. This could include enabling the incentive to reduce the cost of working from home, car share, or encouraging walking – in addition to public transport or bicycle equipment discounts.



1. Introduction

1.1 Background and Scope of Engagement

The Darebin City Council (herein 'DCC' or 'Council') Council Plan 2021-2025¹ identifies the requirement to review Council's Parking Permit Policy (Strategic Action 2-37).

In response to this action, Council has prepared a Draft Parking Permit Policy for Council adoption.

As part of the preparation of the draft policy Council has sought to undertake a peer review to ensure it is fit-for-purpose in terms of:

- equity of use
- transparency
- enforceability
- compliance with legislation and industry guidelines and standards.

Stantec was engaged by Council in December 2022 to review the relevant documentation and prepare a peer review report of the draft policy.

1.2 Reference Documents

Reference has been made to the following in preparing this report:

- Climate Emergency Plan
- Boroondara Parking Permit Policy, 2016
- Moonee Valley Parking Permit Eligibility Criteria
- Maribyrnong Resident Parking Permit Policy, 2014
- Yarra Parking Permit Policy
- Banyule Parking Permit Policy
- Austroads Guide to Traffic Management Part 11 – Parking
- Resident Parking Permit Policy, Community Engagement Report, Greenshoot Consulting, December 2022

1.3 Limitations

There are a number of aspects of permit parking schemes that, could require a fuller appreciation of the economic implications of the policy in order to provide a wholistic review. This would require a full cost-benefit analysis, or similar. This review is limited to the broader intent of the scheme to manage parking and encourage sustainable transport outcomes.

¹ Council Plan 2021-2025 <https://www.darebin.vic.gov.au/about-council/council-structure-and-performance/council-plan>



2. Background Review

2.1 Travel Behaviour in Darebin

2.1.1 Mode shares

Travel mode shares for Darebin, as shown below, indicate that it is reasonably car-dependent, but is well below the Greater Melbourne average of 75% car use (approx.).

66%

Car / Passenger

25%

Public Transport

9%

Active Travel / Other

Source: ABS Census 2016 Resident Journey to Work for the City of Darebin

2.1.2 Car ownership (per household)

At 1.4 cars per household car ownership within Darebin, as shown below, is below the Greater Melbourne average of 1.6 cars per household.

1.4 cars

Darebin Average

1.6 cars

Detached Homes

0.9 cars

Apartments

Source: ABS Census 2016, Car Ownership for the City of Darebin

2.2 Current Parking Permit Policy

Darebin City Council currently operates a policy that provides various parking permits to eligible households. The policy was first introduced in 1997 and has undergone several reviews, most recently in 2017.

In 2004, Council amended the policy to restrict properties that were built after 20 December 2004 to access parking permits. Known as the '2004 Rule' this rule seeks to ensure newer developments are 'self-sufficient' in their parking supply. The 2004 policy update was supported by a review that was undertaken by SKM in May 2004.

In 2017, Council amended the policy to allow post-2004 properties access to one *Type 2 Temporary Permit* per month at a significant fee, to allow limited opportunities for post-2004 dwellings to access parking permits. This update also removed the eligibility for rebuilds.

2.3 Community Engagement

Community engagement on parking permits was completed by Greenshoot Consulting ahead of preparing the draft Policy.

The engagement involved an online survey, community workshops, pop-up events and drop-in sessions. Overall, 686 people provided comments or opinions on various aspects of the proposed parking policy.

2.3.1 Car Ownership of Respondents

It is important to note that the opinions of the members of the community reflect typically those that own cars, compared those that do not. Information provided in the project brief by Council is set out in Table 2.1, while the ABS Census car ownership data for the Darebin LGA is set out in Table 2.2. A comparison of the community engagement with the ABS Census data indicates overrepresentation within the community engagement responses, in percentage terms, of people who own more than 1 car and an underrepresentation of people who don't own cars.



Table 2.1 – Car Owned per Household – Community Engagement Respondents

Cars at household	Count	Percentage
0	13	2.1%
1	253	40.4%
2	274	43.8%
3+	86	13.7%
Total	626	100.0%

Source: City of Darebin

Table 2.2 – Car Owned per Household – Darebin LGA (Census 2021)

Cars at household	Count	Percentage
0	7,366	12.48%
1	27,575	46.71%
2	17,619	29.84%
3+	6,480	10.98%
Total	59,040	100.00%

Source: ABS Census as provided by City of Darebin

2.3.2 Policy Options

The community was asked to consider 4 different parking policy options:

1. 2 resident permits and 100 visitor permits, appealable to households built on or before 20 December 2004
 - Respondents felt that the “2004 rule” is unfair and should be changed to offer everyone equal access to car parking.
2. Building on Option 1 by adding the ability for households of 1-2 dwellings on a lot built after 20 December 2004 to access the same number of resident and visitor permits.
 - Seen as fairer as it increased access to parking permits
 - Respondents highlighted that parking problems were developer and council created.
 - People living in higher-density developments wanted more access to on-street parking
3. Building on Option 2 by adding the ability for households of 3-4 dwellings on a lot built after 20 December 2004 to access 1 resident permit and 100 visitor permits.
 - Seen as fairer as it increased access to parking permits
 - People living in higher-density developments built after the 2004 rule wanted more access to on-street parking
4. A different kind of system that allocates parking permits on the basis of priority, and the amount of parking spaces available in an area. Only instances of 4+ dwellings on a lot built after 20 December 2004 would be ineligible for parking permits.
 - Viewed as cumbersome, lacking transparency and difficult to administer.

Considering this feedback and review of the draft Policy, it appears that Option 2 has been implemented within the current draft Policy.

2.3.3 Other Key Themes

- The community respondents supported free carers permits
- Parking should be covered by rates
- Aspects of the current policy have been poorly communicated
- Community not against sustainable travel incentives
- Desire to see parking permits allocated to support disadvantaged members of the community.



3. Proposed Parking Permit Policy

3.1 Purpose of a Parking Permit Policy

The general purpose of a parking permit scheme is to protect on-street parking for residents of older housing stock that have historically had access to parking along residential street frontages. The policy is put in place in areas where competition for on-street parking is high. This can occur anywhere in a municipality but is generally found in residential areas that back onto commercial zones (high streets or activity centres of some kind) or in residential areas that were built before car ownership became more and more affordable. In earlier years of lower car ownership, the amount of parking available on the street was sufficient – meaning no need to provide an on-lot parking space. Indeed, many residential areas long pre-date widespread motor car use. However, the increased number of 2- and 3-car households (and their visitors) has created high demand for on-street parking spaces.

The purpose of the policy is to set a baseline for Council providing car parking for dwellings that had limited or no access to car parking at the time the policy was originally made. For Darebin, this baseline has been set at 20 December 2004 – the “2004 rule”.

Drawing a line in this way creates two outcomes:

- Residents that previously had access to on-street parking continue to do so.
 - This is “fair” as the decision to develop and the subsequent homebuying decision would have been made in view of the car use and parking availability at the time (i.e. lower car use and plentiful on-street parking).
- Residents of dwellings built after the date cannot access a permit.
 - This is also “fair” as the decision to develop and the subsequent homebuying decision will be made in view of the parking availability at the dwelling. This will either be zero parking or one or more off-street spaces.

To some, this will seem “unfair” as it creates a perceived set of “haves” and “have nots”. However, it is objectively “fair” as the policy is essentially saying:

- Council will continue to manage the needs of parking for those that it previously did so.
- Council will not take on the responsibility of providing and managing parking for new developments.
 - Developers must decide how much on-lot parking to provide
 - Residents must decide if the amount of on-lot parking is suitable for their needs, including any visitor parking.

A policy that retains these tenets remains objectively fair.

Further, and for the same reasons, this policy is also “fair” when applied to any other types of permit that are linked to the “2004 rule”, such as visitor permits.

3.2 Structure of Policy

The draft Darebin Parking Permit Policy is structured as follows:

- **Introduction** – set the purpose and objectives of the policy as well as relevant legislation
- **Scope** – states objectives for how the policy has been developed.
- **Types of Permits** – states the purpose of each permit type, the eligibility criteria and where the permits apply. The types of permits are:
 - Resident Permit
 - Visitor Permit
 - Carer Permit
 - Service Permit
 - User Pays Permit
- **Sustainable Transport Incentive** – introduces an alternative for residents who do not want to take up a parking permit.



- **Use of Permits** – sets conditions for permit use and what to do if a permit is lost or stolen, or what to do to cancel a permit.
- **Cost of Permits** – sets out why fees are charged and the rate of concession
- **Appeal** – set outs general ground for appeal, including for applications in extenuating circumstances
- **Governance** – sets the formal review period of 5 years and the requirement for an annual efficiency review.

3.3 Assessment Criteria

When reviewing the policy, we have not adopted a line-by-line tick box approach, but rather we have flagged where there is a clear conflict or potential violation of these criteria,

Typical criteria for the assessment of any policy in the public domain are:

- **Equity:** Ensure that the policy does not disproportionately burden any particular group or create any unintended negative consequences for certain groups of residents, such as low-income households or individuals with disabilities.
- **Transparency:** Review the policy's eligibility criteria and ensure that they are clear, consistent, and based on objective criteria such as residency, vehicle ownership, and parking availability.
- **Consistency:** Ensure that the policy is consistent across all areas of the community, and that it does not create any unintended disparities between different neighbourhoods or areas.
- **Proportionality:** Review the policy's enforcement mechanisms and ensure that they are proportionate to the severity of the violation, and that penalties are not overly harsh or excessive
- **Impartiality:** Review the policy's appeal process and ensure that it is fair, impartial, and provides an opportunity for residents to contest decisions related to parking permits.
- **Reasonableness:** Review the policy's alternative solutions, and consider if there are any other ways the parking policy's objectives can be achieved, and if the policy is reasonable in light of the situation it's addressing.
- **Community Involvement:** Review the policy's community engagement process, ensuring that the community was involved and aware of the parking policy's development, and that their feedback was considered.

3.4 Introduction [to the policy]

A detailed review of the policy "Introduction" is set out in Section A.1 of Appendix A.

The content in the introduction section is broadly satisfactory; however, the Appendix includes some minor items for consideration which are aimed at improving readability and clarity.

3.5 Scope

A detailed review of the policy "Scope" is set out in Section A.2 of Appendix A.

The two suggestions to note from this review are:

- Consider clarifying the introductory sentence to read "*Permits are a tool to prioritise parking in Darebin*"
- within the accompanying bullet points, we suggest mentioning "consistency" as part of the scope of the policy.

3.6 Permit Types

3.6.1 Resident Permit

A detailed review of the *resident* permit type is set out in Section A.3.1 of Appendix A.

Key points to note from this review are as follows:

- The key change is a recommendation to remove the ability for a lot with two homes built after 2004 to have access to a parking permit provided they don't have a car parking waiver or a reduction in the statutory car parking requirement.
 - This is effectively saying that people who already have car parking are entitled to more



- this type of policy change is inconsistent with the objective of the policy itself and also councils wider strategic goals of reducing car use
- We also recommend implementing a permit system that ties the permit to a particular motor vehicle.
 - this will ensure the permit is used for that vehicle only
- The number of permits available to a *home above a shop* will need to be corrected.
- The definition of what constitutes access to parking is broadly acceptable; however, we recommend that a definition that includes the “presence of a crossover” is considered instead. A similar policy wording is defined in permit parking policies in neighbouring municipalities.
- Some minor wording changes are recommended to remove potentially (albeit inadvertent) language from the policy wording.

3.6.2 Visitor Permit

A detailed review of the *visitor* permit type is set out in Section A.3.2 of Appendix A.

Key points to note from this review are as follows:

- Any duplication of the general wording that applies to all types of parking permits should be removed from the “*Purpose*” subsection.
- It is not clear why the area in which the visitor parking permit is valid would be different to a resident parking permit.
 - We recommend Council adopts the same wording for visitor permits as per resident permits, for ease of use and consistency.
- Other minor wording edits noted.

3.6.3 Carer Permit

A detailed review of the *carer* permit type is set out in Section A.3.3 of Appendix A.

Key points to note from this review are as follows:

- Any duplication of the general wording that applies to all types of parking permits should be removed from the “*Purpose*” subsection.
- It is not clear why the area in which the carer parking permit is valid would be different from a resident parking permit.
 - We recommend Council adopts the same wording for carer permits as per resident permits, for ease of use and consistency.
- Other minor wording edits noted.

3.6.4 Service Permit

A detailed review of the *service* permit type is set out in Section A.3.4 of Appendix A.

Key points to note from this review are as follows:

- Any duplication of the general wording that applies to all types of parking permits should be removed from the “*Purpose*” subsection.
- It is not clear why the area in which the service parking permit is valid would be different from a resident parking permit.
 - We recommend Council adopts the same wording for service permits as per resident permits, for ease of use and consistency.

3.6.5 User-Pays Permit

A detailed review of the *user-pays* permit type is set out in Section A.3.5 of Appendix A.

Key points to note from this review are as follows:

- The premise of user-pays permit is supported on the basis of the wording set out in the “*Purpose*” subsection.
- Any duplication of the general wording that applies to all types of parking permits should be removed from the “*Purpose*” subsection.



- Similar to other permits, it is not clear why the area in which the *user-pays* parking permit is valid would be different from a resident parking permit.
 - It is not specified what the process would be for determining high parking occupancy in residential streets, or what the qualifying criteria would be to make such a judgment. This opens the process up to appeal.
 - Given the value of the permit, applying it to a small area increases the likelihood that permit holders would complain due to not being able to find a parking space on a nominated street.
 - We recommend Council adopts the same wording for *user-pays* permits as per resident permits, for ease of use and consistency.

3.7 Sustainable Transport Incentive

3.7.1 Overview

The sustainable transport incentive gives households that do not want to take up their parking permit rights an incentive to use alternative travel modes:

- A MYKI pass with a balance of \$100 MYKI money; or
- A \$100 voucher to a local bicycle shop based within the City of Darebin.

3.7.2 Assessment

It is improbable that the sustainable transport incentive, priced at \$100, is sufficient to encourage people to give up their car. It will be attractive to people who already don't own a car or are about to give up their car. It is unlikely within itself to encourage people to move away from car use.

The question is therefore one of equity.

- Do people who get a parking permit, somehow get access to a higher value commodity (the parking space) than the sustainable travel incentive being offered?
 - In many ways, yes, a car parking space is a higher value asset than an annual incentive valued at \$100.
 - It is accepted that the cost of residents parking cars on the street is subsidised. It is explicitly stated in the *user-pays* permit wording in the policy.
 - It is objectively inequitable that people that don't own cars subsidise those that do. That said, it is difficult to unpick all the aspects of our personal finances that subsidise car use.
 - However, in this instance, as justification for the high price of the *user-pays* permit Council has identified that \$300 per month is the price at which Council is not subsidising use of on-street parking.
 - To gain full access to equivalent value, the sustainable transport incentive should be provided based on how many resident parking permits a household can access, including visitor permits. This addresses the distributional equity issue of some households giving up more value in terms of lost access to more parking permits than those that don't (such as household giving up 1 permit, getting the sustainable transport incentive and still having on-lot parking). We acknowledge this makes the process marginally more complex.

We recommend Council considers a sustainable transport incentive that is based on the following methodology:

- start with the value of the parking space being given up. This is \$300, based on the above discussion and is internally consistent with other parts of the policy.
- Consider that people who can access permits must pay to get the value of the permit, while people who get the sustainable transport incentive would not have to pay to apply.
- We recommend that the application fee for the respective resident parking permit being given-up should be subtracted from the \$300 value whether this is the equivalent of the first or second permit, or visitor permit access.

3.7.3 Distributional Equity Considerations

There are also other equity questions:

- Do people live near a public transport route that serves their needs?
- Are they physically able to use a bike?



- Do people live in an area that is conducive to safe bicycle travel?
- Multiple people can use a car, but only one person can travel on a MYKI or use a single bike.

These can be addressed by giving residents a choice between a resident car parking permit and a MYKI pass or bicycle shop voucher. There are several alternatives, including:

- **Walking:** Encourage the use of walking, which can help reduce the need for a resident car parking permit.
- **Car-sharing programs:** Encourage the use of car-sharing programs, such as car-sharing clubs or ride-sharing services, which allow residents to access a car when they need it.
- **Bike-sharing programs:** Encourage the use of bike-sharing programs, which provide residents with access to a bike when they need it, without the need for a resident car parking permit.
- **Rates incentives:** Provide rates incentives for residents who use public transportation, bike-sharing programs, or carpooling programs instead of a resident car parking permit.
- **Telecommuting:** Encourage the use of telecommuting, which allows residents to work from home.

By offering a variety of alternatives, and providing cash-equivalent incentives, Council can ensure that residents have a range of options to choose from, and that the choice is fair and equitable for all residents, regardless of their needs and preferences.

3.7.4 Other considerations

While it is possible to cancel one of the parking permit types, the policy does not specify a way in which to cancel the sustainable travel incentive. This appears more difficult to do so as effectively money has changed hands and it would be difficult to recoup the spend.

This could become a problem when people want to move house. Access to a parking permit is an important consideration for many homeowners or renters. The inability to sell or let a house without access to a parking permit places an incumbrance on when those transactions can take place.

We recommend that Council consider a means for a resident to reverse the sustainable transport incentive. This could simply be that the resident repays council in cash on a pro-rata basis.

3.8 Use of Permits

Stantec generally agrees with the wording of this section of the policy.

We believe it is unlikely that the general public would know when they are in a mixed-use, commercial or industrial area. It would be simpler to restrict the use of resident permits to allow parking in front of residential properties within the designated street or permit zone.

The list of exemptions should include any paid parking areas.

Given the commentary above, the *Permit Cancellation* section should make allowance for the cancellation of the sustainable travel incentive.

3.9 Cost of Permits

Stantec agrees with the wording of this section of the policy.

3.10 Appeals Process

Stantec agrees with the need for an appeals process.

The wording is generally sufficient; however, we recommend the following.

- Include the following wording at the end second bullet point which references a decision an applicant disagrees with:
 - *A decision will not be reviewed simply because it has caused inconvenience to the applicant, including placing a financial cost on them.*



- Extenuating circumstances - Given the types of permit on offer are clear as to their use and eligibility, it is illogical that people in such need would have to have an initial application refused to then access the appeals process as a means to gain a parking permit.
 - We recommend that *extenuating circumstances* be allowed for when a permit is applied for as a primary action
 - Given the social stigma/security risks associated with some of these circumstances (escaping domestic violence, emergency accommodation etc), there should not be a special *extenuating circumstances* permit.
 - > We consider this is best represented by a resident permit and thus the application process should allow for this is a primary means of accommodating this user group without undue delay.
 - > This could simply be a section in the application document or online form that allows an applicant to provide further information and attach supporting evidence.
 - > The part of the application document or online form does not need to be called “*extenuating circumstances*”. It could simply be worded “*Please provide any other information to support your application for a parking permit*”, or similar.
 - To avoid any perception of prejudging what is or isn’t an “extenuating circumstance”, no examples should be provided in the policy or on application forms.
 - > Wording such as “*eg. Staying in emergency accommodation, escaping domestic violence, a medical condition that prevents the use of the off-street parking*” should be removed.



4. Council Specific Requests

Within the brief for this project, Council set out matters to consider when undertaking this review. These are set out in Table 4.1 below along with our response.

Table 4.1 – Council Specific Requests and Stantec Responses

Item	Stantec Response
Review of the draft Policy including its suitability and effectiveness and assess whether it achieves' its designated purpose.	Broadly, yes, the draft Policy is generally fit for purpose. The exception to this is the addition of dwellings built after 2004 now becoming eligible for parking permits. This does not meet Councils wider objectives of reducing car use.
Provide advice on whether the draft Policy is consistent with other metropolitan Councils.	Stantec has reviewed several other permit parking policies for neighbouring councils when preparing this report, including Boroondara, Merri-Bek, Maribyrnong, Banyule, Yarra and Moonee Valley. Some policies are standalone, some are part of a wider parking management policy. While there are differences between the permit types on offer across each council area, the purpose and objectives of each policy all read similarly. The draft Darebin Parking Permit Policy is consistent with the approach adopted elsewhere.
Equity was a significant issue for Councillors as this project was being scoped. Are there any equity or gender specific issues?	We do not consider there to be any equity concerns with the purpose of a parking permit scheme or policy (as set out in Section 3.1 of this report). There are minor equity considerations with the wording used in some parts of the draft policy, see Section 3.6 and Appendix A for details. The sustainable travel incentive creates potential equity issues that warrant further consideration. These are detailed in Section 3.7: <ul style="list-style-type: none"> • Not everyone will have the same access to public transport and the bicycle network, so more options should be provided to enable residents to travel sustainably regardless of their location or personal needs. • The value of the incentive should reflect the unsubsidised value of the parking permit.
Provide advice in relation to relevant legislation, design guides and standards.	There are no specific recommendations related to legislation, design guides and standards. The draft Policy generally reflects the methodology set out in the Austroads Guide to Traffic Management Part 11: <i>Parking Management Techniques</i> and is consistent with policies adopted in neighbouring municipalities.
Test the proposed draft Policy in relation to the eligibility criteria and advise on the implications they would expect to see. Are there any issues or concerns in relation to the eligibility criteria?	The eligibility criteria set out in the draft policy are generally sufficient. The exception to this is the addition of dwellings built after 2004 now becoming eligible for parking permits. This does not meet Councils wider objectives of reducing car use. See Section 3.6 and Appendix A for details.
Test the proposed draft Policy in relation to parking permit types.	The proposed parking permit types account for the majority of envisaged users. The exception to this is how people facing extenuating circumstances are to be accommodated. the way the policy is worded it appears as if they first have to have a permit application refused before they can appeal and the council will then consider their extenuating circumstances. Consequently, we recommend the policy is updated to include a primary means for people to put forward any extenuating circumstances they may be facing at the point of making the permit application. See Section 3.10 for further details.



Item	Stantec Response
<p>Review the Policy from an enforcement, administrative and operational perspective. Are there any expected enforcement, administrative or operational challenges?</p>	<p>From an enforcement perspective, it is not clear that all parking permits for residents will be tied to your specific vehicle. generic resident permits are easily transferable between vehicles and are easily duplicated which makes enforcement a challenge.</p> <p>From an administrative perspective, it would be more straightforward to apply the same rules regarding the area to which a permit applies to virtually all permit types using the current policy wording for resident permits as a template. This will enable ease of use and consistency of application.</p>
<p>Is the Policy easily understood?</p>	<p>Broadly yes, the policy is easily understood.</p> <p>there are areas where is recommended that some repeated information is removed and that some parts of the text can be clarified or simplified. These are relatively minor changes to make.</p>
<p>Can it be implemented, if not, what improvements are recommended?</p>	<p>In its current form that policy could not be implemented. We recommend that the change to allow homes built after 2004 to be able to access resident permits should not go ahead. changing the policy in this manner would go against the stated objectives off the policy, as detailed in Section 3.6 and Appendix A.</p>
<p>Is the definition of ‘access to off street parking’ clear? Consultant to consider information provided in the SKM report on page 32.</p>	<p>The definition set out in the SKM report is outdated. Services such as aerial photography and Google Street View are readily available to identify whether a property has access to an on-lot space.</p> <p>These research techniques will be able to identify whether the property has a suitable rear laneway or alternative right-of-way access that realistically provides access to an off-street car park space.</p> <p>Stantec supports an alternative definition that is based on the presence of a crossover to the property, irrespective of whether that crossover provides access to off-street parking or otherwise.</p>
<p>Does the consultant identify any improvements from a customer focused perspective?</p>	<p>The recommended changes to accommodate people facing extenuating circumstances should be made to enable these people to access parking without undue delay.</p> <p>In terms of how the policy is written, there are some minor wording changes needed to remove or minimise repetition and to clarify or simplify some parts of the report.</p>
<p>Opportunities to strengthen the Policy</p>	<p>The recommendation to tie resident car permits two specific vehicles would strengthen the enforcement side of the policy.</p> <p>The recommendation to continue to not permit residents of homes built after 2004 to access my parking permit we'll strengthen the policy terms of its compliance with its stated objectives.</p> <p>The recommendation to accommodate people facing extenuating circumstances will strengthen in the policy from a compassionate and customer focused perspective.</p>
<p>Advice on staging or date to come into effect</p>	<p>We do not consider that any aspect of this policy needs to be staged.</p>



5. Conclusions and Recommendations

The following key recommendations are made based on the assessment and discussions set out in this report:

- Update the draft policy to remove the ability for residents of any home built after 20 December 2004 to gain access to a resident parking permit. This is to ensure:
 - the policy remains consistent with the objective of managing resident on-street parking as a legacy issue only,
 - Council does not take on the responsibility of providing and managing parking for newer residences
 - the policy remains consistent with the objective of managing car use and council's wider sustainability objectives of reducing vehicle travel.
- The policy should be updated to enable people facing extenuating circumstances to have a primary means of applying for a parking permit without undue delay.
 - Currently, as written, the extenuating circumstances part of the policy is in the *Appeals Process* section, meaning an application would need to be refused before the extenuating circumstances can be put forward
 - We recommend that parking permit application forms should include a section that allows a case for extenuating circumstances to be made. Examples of extenuating circumstances should not be provided in the policy.
 - Given social stigma/security risks that are associated with some of these circumstances (escaping domestic violence, emergency accommodation etc), we consider this is best dealt with by an application for a resident permit.
- From an administrative perspective, we recommend applying the same rules regarding the area to which a permit applies. The same rules should apply to virtually all permit types. The current policy wording for resident permits can be used as a template. This will enable ease of use and consistency of application.
- The sustainable transport incentive is a positive initiative; however, further consideration by Council is required to establish the fair value of the incentive in view of the value residents forego by not taking up parking permit rights.
 - The value of the incentive should be based on the value of the parking space, application fees and administration costs.
 - Distributional equity matters can be addressed by providing residents with a broader choice for using the sustainable transport incentive to support their individual needs. This could include enabling the incentive to reduce the cost of working from home, car share, or encouraging walking – in addition to public transport or bicycle equipment discounts.
- Other recommendations are relatively minor and are set out in the various relevant sections of this report. These recommendations are largely improving readability, clarity, and to remove repetition.



Appendix A. Parking Permit Policy Detailed Review



A.1 Introduction [to the policy]

Policy Wording	Stantec Comment
Purpose	
The purpose of the Parking Permit Policy (Policy) is to provide a clear decision-making tool for allocation of parking permits across the City of Darebin.	Agree with this definition. The policy document is acting as a “container” that is separate from the objectives of the policy itself. The policy should be clear, in terms of comprehension to a wide range of non-technical audiences. It should also be transparent in terms of how the policy will be administered by Council.
Objectives	
<ul style="list-style-type: none"> Fairly distribute the limited parking spaces available in areas where there is a high demand for on-street parking Improve the management of Council’s on-street car parking asset while balancing peoples’ accessibility needs 	<p>Agree with these two objectives.</p> <p>the first and second objectives can be combined into one which could read</p> <ul style="list-style-type: none"> “Manage councils limited on-street parking asset in areas where there is high demand for on-street car parking while balancing people’s accessibility needs.”
<ul style="list-style-type: none"> Improve safety, amenity, environmental and wellbeing outcomes for transport and parking 	Agree
<ul style="list-style-type: none"> Provide a choice for households transitioning towards sustainable transport modes who do not require any on-street parking; and 	<p>Agree</p> <p>Typo “;and” – are there any more objectives?</p>
Legislation	Agree. No comment
Climate Emergency	Agreed. It is imperative that all policies have clarity on how our actions contribute to our carbon footprint and how we can reduce that footprint to achieve net zero carbon emissions.

A.2 Scope

Policy Wording	Stantec Comment
To prioritise parking in Darebin using permits as a tool.	Not clear what this means – suggest: “Permits are a tool to prioritise parking in Darebin”
<ul style="list-style-type: none"> Align with the visions and objectives of the Darebin Transport Strategy 2017-2027, the Safe Travel Strategy 2018-2028, and the Climate Emergency Plan Be consistent with Austroads Guide to Traffic Management Part 11 – Parking Provide permit distribution in a way that has been consulted on with the community that considered accessibility, safety, equity, and local amenity Be equitable, sustainable and accessible, with decisions made in a transparent way. 	<p>Agree with these points.</p> <p>The last point could include “consistency” as part of the scope.</p>

A.3 Permit Types

A.3.1 Resident Permit

Policy Wording	Stantec Comment
Purpose	
The purpose of the <i>resident permit</i> is to give residents of eligible homes greater opportunity to park on-street in their area.	Question the use of the word “ <i>greater</i> ” here. It implies a hierarchy, and could be construed as inequitable as the policy does not apply to all residents.



Policy Wording	Stantec Comment
	Suggest: <i>The purpose of the resident permit is to give residents of eligible homes the opportunity to park on-street in their area.</i>
A resident permit allows exemption from timed parking restrictions of 1P or longer – except where supplementary signage states permits are not valid (see Section 5.2 for list of exemptions). Resident permits also allows the permit holder to park in a Permit Zones within the permit area that the permit is issued.	Agree. Review wording of last sentence, suggest: <i>Resident permits also allow the permit holder to park in a Permit Zone within the permit area that the permit is issued.</i>
Eligibility	
To be eligible for a resident permit, an applicant must: <ul style="list-style-type: none"> • Live in a home in Darebin within 100m of where time restricted parking or permit zone restrictions apply; AND, • Provide proof that the home is their primary residence; AND, • Live in an eligible home. 	Generally agree with the 3 bullet points noted. The method for determining how “100m” is measured should be stated. The acceptable proof of residence documents should be stated here or in a general information section. Suggest that permits are only issued to a household on the basis that they have a registered car at the address. Residents can access up to two resident permits per household. It is logical that the release of permits is only done so on the basis that the person had a need (i.e. a car to park) and not an entitlement to receive on-street parking permits even if they don’t own a car. A resident permit should be tied to a particular motor vehicle to ensure that the car ownership restrictions are being adhered to and that residents are not giving the permit to other people. A common infringement of resident car parking permit systems is residents copying the permit and using it across multiple vehicles. This is more difficult to do if the permit displays the vehicle license plate number. Tying the permit to the vehicle that it's in is similar to the eligibility criteria applied in the City of Melbourne and in the City of Yarra.
<u>Eligible homes</u>	
<ul style="list-style-type: none"> • All homes built before 20 December 2004 	Agree. No comment.
<ul style="list-style-type: none"> • A single home on a lot built on or after 20 December 2004, where additional homes have not been added after the initial homes' construction 	Agree. The wording could be tightened to be clear that the residential lot must have existed at 20 December 2004 and that this line is simply about replacing 1 dwelling on a lot with 1 dwelling.
<ul style="list-style-type: none"> • Homes built on or after 20 December 2004 as part of a new development or subdivision resulting in 2 new homes on the original lot AND did not have a planning permit granted for a parking waiver or reduction in the minimum car parking requirements 	Disagree. We recommend removing this line from the policy. <ul style="list-style-type: none"> • Given permit parking restrictions that have been in place in 2004, it is highly likely that these types of dwellings would have at least one if not two off-street car parking spaces in order to meet their planning scheme car parking requirements • Effectively, this policy is saying that dwellings that already have car parking are entitled to more. • For these reasons this type of policy change is inconsistent with the objective of the policy itself and also councils wider strategic goals of reducing car use.
<ul style="list-style-type: none"> • Homes above shops with no access to off-street parking 	Agree, although defined at the start of the document, we suggest putting the definition of a <i>home above a shop</i> in a footnote for clarity. The way it is written here makes it seem as if it is outside of the 2004 rule.
Where a waiver was provided for one of the two homes in the subdivision, the home that the waiver applies to is the property that is no longer eligible.	State what the waiver relates to. This should be a footnote to the second bullet.
<u>Ineligible homes</u>	
<ul style="list-style-type: none"> • Homes built after 21st December 2004 as part of a new development of 2 homes on a lot that had a planning permit granted for a parking waiver or reduction in the minimum car parking requirements 	Should be altered to include all lots that have been subdivided or had a separate dwelling added after 2004.



Policy Wording	Stantec Comment												
<ul style="list-style-type: none"> Homes built after 21st December 2004 as part of a medium-density or high-density development (3 or more dwellings on a lot) 	Agree. No comment.												
<ul style="list-style-type: none"> Homes above shops that have off-street parking 	Agree. No comment.												
<u>Number of resident permits available</u>													
<p>The maximum number of resident permits per home is 2. Homes with access to off-street parking are eligible for a maximum of 1 Resident Permit.</p> <table border="1"> <thead> <tr> <th>Type of home</th> <th>Without access to off-street parking</th> <th>With off-street parking</th> </tr> </thead> <tbody> <tr> <td>Built before 20/12/2004</td> <td>2</td> <td>1</td> </tr> <tr> <td>New eligible homes</td> <td>2</td> <td>1</td> </tr> <tr> <td>Above a shop</td> <td>0</td> <td>1</td> </tr> </tbody> </table>	Type of home	Without access to off-street parking	With off-street parking	Built before 20/12/2004	2	1	New eligible homes	2	1	Above a shop	0	1	<ul style="list-style-type: none"> Remove new eligible homes per above commentary Amend “above a shop” allocations <ul style="list-style-type: none"> – 1 permit where there is no access to off-street parking – per current policy – Zero permits where there is off-street parking. Suggest a sunset clause is considered to reduce the number of permits available over time
Type of home	Without access to off-street parking	With off-street parking											
Built before 20/12/2004	2	1											
New eligible homes	2	1											
Above a shop	0	1											
<p>For the purpose of this policy, off-street parking means an area on a private property designed for parking, including a driveway, garage, or carport.</p> <p>If residents use their off-street car parking for another use (e.g. storage) or have removed their off-street parking since the adoption of this Policy, those homes are eligible for one less permit as if they were to have off-street parking.</p>	<p>Generally agree with this definition of what constitutes “access to parking”.</p> <p>The Merri-Bek parking permit policy, which was based on work completed by Stantec (then GTA Consultants), defines access to off-street parking as the presence of a crossover to the property.</p> <p>Moonee Valley has a similar policy to Merri-Bek, but does not include access to a laneway or right of way as access to parking. We consider this unnecessary in this case.</p> <ul style="list-style-type: none"> Any instances whereby laneway access is considered too restrictive to effectively provide access to off-street parking can be considered on a case-by-case basis <p>The “presence of crossover” definition is simpler than that proposed by Darebin and should be considered for adoption here.</p>												
Where these permits apply													
<p>A resident permit can be used in the whole permit area of where the home is located.</p> <p>Resident permits cannot be used in front of any shops or commercial properties, even if there is a home attached to the property.</p>	Agree. No comment.												

A.3.2 Visitor Permit

Policy Wording	Stantec Comment
Purpose	
<p>The purpose of <i>visitor permits</i> is to give visitors to eligible properties greater opportunity to park nearby on a short-term basis.</p>	<p>Question the use of the word “<i>greater</i>” here. It implies a hierarchy, and could be construed as inequitable as the policy does not apply to all residents.</p> <p>Suggest:</p> <p><i>The purpose of visitor permits is to give visitors to eligible properties the opportunity to park nearby on a short-term basis.</i></p>
<p>In the street or area for which the permit is issued, visitor permits allow:</p> <ul style="list-style-type: none"> Parking in residential permit zones Exemption from timed parking restrictions of 1P or longer – except where supplementary signage states permits are not valid (e.g. in front of commercial properties) Visitor permits are sold to eligible residents in books of 10 physical ticket permits, or groups of 10 digital permits. Each visitor permit is valid for a single day only. 	<p>This bullet list should be trimmed to express only the details unique to visitor permits that are not mentioned anywhere else, such as in general permit requirements or in Section 5.2 of the policy.</p> <p>The way in which visitor permits will be administered i.e. providing 10 separate permits valid for a single day, is consistent with other policies adopted and neighbouring municipalities, including Merri-Bek Council.</p>



Policy Wording	Stantec Comment
<ul style="list-style-type: none"> Physical visitor permits must always be displayed on the left-hand side of the dashboard in the visitor's parked vehicle Digital visitor permits must be assigned to a single vehicle's registration number Visitor permits are valid for a maximum of 12-months without use from time of purchase until 28th February each year Visitor permits are non-refundable <p>Visitor permits do NOT guarantee parking will be available.</p>	
Eligibility	
<p>Visitor permits may only be purchased by residents eligible for a resident permit. Eligible residents do not need to hold a current resident permit to purchase visitor permits.</p> <p>A visitor permit is only valid while the resident resides at the address shown on the approved application form and will only be issued to homes that have parking restrictions in their street.</p> <p>Visitor permits are not designed for use by residents. If you are a resident at the property and are wanting to use the permit for yourself or someone else living in the property, you need to apply for a residential parking permit.</p> <p>A fee is charged for visitor parking permits, concession discounts may apply.</p>	Agree. No comment.
Where these permits apply	
<p>Visitor permits can only be used on the street shown on the approved application form. If the home is on a corner of two or more streets, the applicant can choose which street the permits are to be used for.</p>	<p>It is not clear why the area in which the visitor parking permit is valid would be different from a resident parking permit.</p> <p>We recommend that Council adopts the same wording for visitor permits as per resident permits, for ease of use and consistency.</p>

A.3.3 Carer Permit

Policy Wording	Stantec Comment
Purpose	
<p>The purpose of <i>carer permits</i> is to give people providing care for a Darebin resident with a long-term health condition greater opportunity to park near the resident's home. They are issued to the resident requiring carers and are transferrable between vehicles.</p>	<p>Question the use of the word "greater" here. It implies a hierarchy, and could be construed as inequitable as the policy does not apply to all residents.</p> <p>Suggest:</p> <p><i>The purpose of carer permits is to give people providing care for a Darebin resident with a long-term health condition the opportunity to park near the resident's home. They are issued to the resident requiring carers and are transferrable between vehicles.</i></p>
<p>Carer permits are free to eligible residents. A maximum of one carer permit per household is available.</p> <p>The permit allows exemption from timed parking restrictions of 1P or longer within the street or permit area that the permit is issued – except where supplementary signage states permits are not valid (see Section 5.2 for list of exemptions).</p> <p>Carer permits do NOT guarantee parking will be available.</p>	<p>Generally agree.</p> <p>The reference to the non-guarantee of availability of a parking space should be removed as it is mentioned elsewhere within the policy and applies generally to all permits.</p>
Eligibility	
<p>To be eligible for a carer permit, an applicant must:</p> <ul style="list-style-type: none"> Live in a home in Darebin within 100m of where time restricted parking or permit zone restrictions apply; AND, Have a long-term health condition that requires a visiting carer <p>Applicants must provide one of:</p> <ul style="list-style-type: none"> A Companion Card; or Appropriate documents from a government health body indicating a long-term health condition that requires visiting carers; or 	<p>Generally agree with these points</p> <p>The acceptable proof of residence documents should be stated here or in a general information section.</p> <p>The method for determining how "100m" is measured should be stated.</p>



Policy Wording	Stantec Comment
<ul style="list-style-type: none"> • Appropriate documents from a medical professional indicating a long-term health condition that requires a visiting carer; or • Evidence that they are a NDIS participant 	
Where these permits apply	
Carer permits are generally issued for the street on which the home is located, or the parking permit area (if one exists) in which the home is located.	<p>It is not clear why the area in which a carer permit is valid would be different from a resident parking permit.</p> <p>We recommend Council adopts the same wording for carer permits as per resident permits, for ease of use and consistency.</p>

A.3.4 Service Permit

Policy Wording	Stantec Comment
Purpose	
<p>The purpose of the service permit is to provide an exemption of up to four weeks from timed restrictions for workers (including tradespeople, removalists, cleaners, etc). servicing Darebin residents who are not eligible for visitor permits.</p> <p>Residents eligible for visitor permits are recommended to purchase these instead.</p> <p>The permit allows exemption from timed parking restrictions of 1P or longer within the street or area that the permit is issued – except where supplementary signage states permits are not valid (see Section 5.2 for list of exemptions).</p> <p>Service permits do NOT guarantee parking will be available</p>	<p>Generally agree.</p> <p>The reference to the non-guarantee of availability of a parking space should be removed as it is mentioned elsewhere within the policy and applies generally to all permits.</p>
Eligibility	
<p>To be eligible for a service permit, an applicant must:</p> <ul style="list-style-type: none"> • Reside in a property in Darebin on a street where time restricted parking or residential permit zone restrictions apply on one or both sides of the street; AND, • Produce evidence of residency in Darebin – current driver's license, utility bill (not mobile phone), residential lease agreement or rates notice indicating the applicant's name and residential address in Darebin; AND, • Produce evidence of tradespeople, removalists, etc. servicing the residence (e.g. quote or receipt) specifying the dates when the work will take place. <p>The tradesperson, removalist or other person providing the service may also apply for the permit on the resident's behalf. The application must include a letter or email from the resident providing consent for the permit application on their behalf.</p> <p>Eligible people can purchase two permits within a twelve-month period (beginning from the commencement of the first permit).</p> <p>Permits are valid for the dates on which the work is expected only, up to a maximum of four weeks. If more permits or a longer time period is required (e.g. extensive works at the property), the applicant should contact Council to request a work zone.</p> <p>A fee is charged for service permits, with no concession discounts.</p>	<p>Generally agree with these points</p> <p>The acceptable proof of residence documents listed here could be put into a general information section and referred to in relevant other permit types.</p>
Where these permits apply	
Permits are generally issued for the street on which the home is located, or the parking permit area (if one exists) in which the home is located.	<p>It is not clear why the area in which a service permit is valid would be different from a resident parking permit.</p> <p>We recommend Council adopts the same wording for service permits as per resident permits, for ease of use and consistency.</p>



A.3.5 User-Pays Permit

Policy Wording	Stantec Comment
<p>Purpose</p> <p>The purpose of the user-pays permit is to allow longer-term access to on-street parking in areas where timed restrictions apply. This permit is priced at a high rate to reflect that Council is not subsidising access to the user, as with other permits, and that sustainable modes of transport should be prioritised.</p> <p>This higher price also manages demand, helping prioritise access to on-street parking for eligible residents and other priority users, while allowing some flexibility when access to on-street parking is required.</p> <p>In the street or area for which the permit is issued it allows exemption from timed parking restrictions of 1P or longer – except where supplementary signage states permits are not valid (see Section 5.2 for list of exemptions).</p> <p>User-pays permits do NOT guarantee parking will be available</p>	<p>Agree with the premise of the introduction of user-pays permit. This is similar to the approach taken in Merri-Bek Council, and the policy wording and the Darebin council document is similar.</p> <p>The reference to the non-guarantee of availability of a parking space should be removed as it is mentioned elsewhere within the policy and applies generally to all permits.</p>
<p>Eligibility</p>	
<p>Any person may apply for this permit.</p> <p>The permit is valid for one month from the date of issue and can be renewed every subsequent month within a 12-month period.</p>	<p>Agree. No comment.</p>
<p>Where these permits apply</p>	
<p>Permits are generally issued for the street requested by the applicant, or parking permit area (if one applies). Council may issue the permit for an alternative street or area at its discretion and in discussion with the applicant (e.g. in the case of a residential street with high occupancy).</p>	<p>Similar to other permits, it is not clear why the area in which a service permit is valid would be different from a resident parking permit.</p> <p>We recommend Council adopts the same wording for service permits as per resident permits, for ease of use and consistency.</p> <p>Furthermore, given the value of the permit, applying it to a small area increases the likelihood that permitholders would complain due to not being able to find a parking space on a nominated street.</p> <p>It is also not specified how “high-occupancy” of a particular residential street would be determined and what the threshold of what constitutes “high” is. Making determinations based on anecdotal evidence would be easily subject to appeal. Collecting data for each application places an administrative burden on Council.</p> <p>For these reasons, we recommend that the area over which a <i>user-pays</i> permit applies is the same as for a resident permit.</p>



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