

Memorandum

Project: 26 Wellington Street & 21 Northumberland Street, Collingwood
Our Ref: 25150M#1
Date: 11th January, 2019

**RE: Traffic Engineering Assessment
Victorian Distillery and Silos - 26 Wellington Street and 21 Northumberland Street, Collingwood**

1 Introduction and Proposal

Our instructions are to review the proposal by the consortium of owners within the Victorian Distillery and Silos at 26 Wellington Street and 21 Northumberland Street, Collingwood (VDAS) to allow the use of the site for the purposes of dwellings.

The proposal is for VDAS to be included in the Schedule to Clause 51.01 (Specific Sites and Exclusions) of the Yarra Planning Scheme (Planning Scheme) to allow use of the land as a “dwelling” (Amendment). It is understood that the proposal is not seeking to rezone the land or for any additional development rights that could result in more intensive uses, only site-specific recognition of existing dwellings.

For the purposes of our assessment, we have been instructed to consider that the majority of lots on the site currently have planning permission to be ‘Caretakers Dwellings’, in addition to permissions for commercial uses. We have been requested to consider the traffic engineering implications of assessing the Caretakers Dwellings being used as Dwellings.

We have also been instructed to consider the implications if the number of lots used as Dwellings exceeded the current maximum number of Caretakers Dwellings permitted.

The current planning permission allowing other commercial uses on the site is not proposed to be altered. Accordingly, the proposal does not mean that each lot on the site will change its use to Dwelling to the exclusion of all commercial uses.

2 Subject Site and Background

In or about 1995 a permit was issued by the Council to redevelop the VDAS to a “20 lot subdivision provisions of associated services and partial use as offices” including 15 caretaker units (Planning Permit No. 95/103). This permit related to the “distillery” part of the building.

A further permit was issued on 24 July 1997 for the “alterations, additions and 12 lot subdivision to the existing building, provision of signage and the change of use to office, light industry and caretakers residences” (Planning Permit No. 97-128). This permit related to the “silos” part of the building.

We are instructed that the various lots on the site comprise a mixture of land uses including solely commercial businesses, a variety of home office style businesses and lots used exclusively as dwellings.

The proposed amendment will allow any lot on the site the flexibility to be used as a dwelling, but does not necessarily mean any of the current uses on the site will change and does not alter each lot’s ability to be used for commercial purposes.

3 Existing Conditions

The subject site is L-shaped and spans between Wellington Street and Northumberland Street in Collingwood. A locality plan and photo of the site are provided at Figure 1 and Figure 2, respectively.

The site has a frontage of approximately 10m to Wellington Street, 32m to Northumberland Street and an overall area of approximately 2,786m².

We understand that the site is divided into 29 'lots' or 'units' and these are variously used for a combination of solely commercial purposes, a variety of home office style or home-based businesses and as dwellings.

A total of 54 car spaces are provided on the site. It is understood that all lots have access to at least 1 on-site car space. There are also areas for loading and bicycle parking on the site (in excess of 40 bicycles within secure areas).

Vehicle access to the site is provided at 3 locations:

- A 3.5m wide crossover to Wellington Street.
- A 4.7m wide crossover to Northumberland Street at the site's eastern boundary.
- A 6.25m wide crossover to Northumberland Street towards the site's western boundary.

The site is zoned Commercial 2. Nearby land use is a mixture of commercial, industrial and residential uses. The site is proximate to a number of Activity Centres including the Brunswick Street, Smith Street, Victoria Street and Bridge Road Activity Centres. The site is also within 1.5km of the Melbourne CBD.



Figure 1: Locality Plan

Source: Melway



Figure 2: Subject Site

Source: Nearmap

4 Existing Transport Conditions

Road Network

Wellington Street is a Council Arterial Road aligned in a north-south direction. Wellington Street typically provides a traffic lane and bicycle lane in each direction, separated by a painted median. On-street parking is limited to the east side of the street. A 40km/h speed limit applies to Wellington Street.

Northumberland Street is a local road aligned in an east-west direction. It has a carriageway width of approximately 5.8m and provides on-street parking on the north side of the street only. It forms an unsignalised T-intersection with Wellington Street. A 40km/h area speed limit applies to Northumberland Street.

Parking Conditions

On-street parking surrounding the site is highly restricted. Parking is generally subject to short-term parking restrictions. There are 90 on-street car spaces within approximately 200m of the subject site.

At the time of the site inspection (11am on Thursday 11th October, 2018), on-street parking was in high demand with 3 vacant spaces, representing a 97% occupancy rate.

There is a commercial off-street carpark adjacent to the site on Wellington Street. This carpark provides 152 car spaces and is open between 6am-8pm Mon-Thu, 6am-12am Fri and 8am-7pm Sat-Sun. Parking is charged at \$6/hr or \$20 all day.

Public Transport and Alternative Transport Modes

The site has a high level of access to convenient public transport services, with train, tram and bus services available in the nearby area. Figure 3 details the public transport routes within the vicinity of the site. The site is located within the Principal Public Transport Network (PPTN) area, as shown at Figure 4.

The site is highly walkable, with a number of Activity Centres and the Melbourne CBD within walking distance of the site. The site has a walk score of 99 out of 100, classifying it as a 'walkers paradise'. Inner Melbourne is also well serviced by bicycle infrastructure.

The site also has access to a large number of car share vehicles within a short walk of the site.

5 Traffic Engineering Review

Under Clause 73.03 of the Planning Scheme, a Caretaker's House and a Dwelling are defined as follows:

Caretaker's House:

A dwelling on the same site as a building, operation, or plant, and occupied by a supervisor of that building, operation, or plant.

Dwelling:

A building used as a self-contained residence which must include:

- a) a kitchen sink;*
- b) food preparation facilities;*
- c) a bath or shower; and*
- d) a closet pan and wash basin.*

It includes out-buildings and works normal to a dwelling.

A Caretaker's House is included within the land use term of Dwelling.

Car Parking Assessment

The Planning Scheme sets out the parking requirements for new developments under Clause 52.06. The purpose of Clause 52.06 is:

- *To ensure that car parking is provided in accordance with the State Planning Policy Framework and Local Planning Policy Framework.*
- *To ensure the provision of an appropriate number of car parking spaces having regard to the demand likely to be generated, the activities on the land and the nature of the locality.*
- *To support sustainable transport alternatives to the motor car.*
- *To promote the efficient use of car parking spaces through the consolidation of car parking facilities.*
- *To ensure that car parking does not adversely affect the amenity of the locality.*
- *To ensure that the design and location of car parking is of a high standard, creates a safe environment for users and enables easy and efficient use.*

A Caretaker's House does not have a specific car parking requirement under Table 1 of Clause 52.06-5. However, given it is included within a 'Dwelling' use under Clause 73.03, it therefore has the same statutory car parking requirement as a Dwelling.

The subject site is located within the PPTN area (see Figure 4) and accordingly the Column B parking rates of Clause 52.06-5 apply to the site. The applicable rates for a Dwelling (and Caretakers Dwelling) are:

- 1 space per one or two-bedroom dwelling.
- 2 spaces per three or more bedroom dwelling, with studies or studios that are separate rooms counted as bedrooms.
- No visitor parking is required.

We have not inspected the internal configuration of every lot to determine whether lots require 1 or 2 car spaces statutorily. We understand that each lot has access to at least 1 car space on the site.

From a statutory car parking perspective however, this is not relevant. The effective change in use from 'Caretaker's House' to 'Dwelling' does not result in a change in the statutory car parking requirement.

Clause 52.06-3 states that:

A permit is not required to reduce the number of car parking spaces required for a new use of land if the following requirements are met:

- *The number of car parking spaces required under Clause 52.06-5 or in a schedule to the Parking Overlay for the new use is less than or equal to the number of car parking spaces required under Clause 52.06-5 or in a schedule to the Parking Overlay for the existing use of the land.*
- *The number of car parking spaces currently provided in connection with the existing use is not reduced after the new use commences.*

In this case, changing from a Caretaker's House to a Dwelling does not change the statutory car parking requirement and the number of car spaces has not been reduced as part of this application. Accordingly, there is no planning permit trigger in relation to car parking for the proposed change of use.

What if more lots are used as Dwellings than the current number of permitted Caretaker Dwellings?

If more lots are used as Dwellings than the current planning permission, in our view these lots would have to be assessed on the basis of a change in use to Dwelling and a car parking reduction *may* be required under Clause 52.06-5 depending on the number of car spaces available to the lots in question and the size of the dwelling (i.e. number of bedrooms).

In this scenario, there are no implications for visitor car parking as none is required.

In the event that a reduction in car parking was required because of one or two-bedroom dwellings without car parking or larger three-bedroom dwellings not having 2 car spaces, this would be acceptable in our view.

Empirical car ownership data from the 2016 Census (ABS) indicates that apartments in the Suburb of Collingwood have significantly lower car ownership rates than the Clause 52.06-5 requirements, specifically:

- 0.6 cars per household residing in a one-bedroom apartment.

- 0.9 cars per household residing in a two-bedroom apartment.
- 1.0 cars per household residing in a three-bedroom apartment.

The site has excellent attributes to support lower car parking for residents including:

- A high level of access to public transport and is within the PPTN.
- The availability of local services, shopping, employment opportunities and recreation facilities within a short distance of the site.
- The site is highly walkable, with the Melbourne CBD and a number of large activity centres within comfortable walking distance.
- Many inner-city destinations are within easy cycling distance.
- The site has convenient access to car share vehicles.

A reduction in car parking for residents would also be consistent with current practice in the City of Yarra for dwellings in similar locations.

We are satisfied that if it was required, a reduction in car parking for Dwellings on this site would be acceptable.

Bicycle Parking

In our view, there is no bicycle parking requirement for a change in use from 'Caretakers House' to 'Dwelling'. Similar to the statutory assessment of car parking, there is no bicycle parking requirement for a 'Caretakers House', but we are satisfied that it is included under the term 'Dwelling' for the purposes of calculating statutory bicycle parking requirements and there is no trigger for bicycle parking as a result of the change in use.

Notwithstanding the above, in excess of 40 bicycle spaces are on the site (i.e. more than 1 per lot), which is a significantly higher level of bicycle parking than the statutory requirement for a dwelling under Clause 52.34. It is also a high level of bicycle parking in context of the statutory requirements for the various commercial/industrial uses listed at Clause 52.34.

Traffic Impacts

We are of the view that there is only a minor difference between a Caretaker's House and a regular Dwelling in terms of the transportation needs of residents.

A Caretaker's House by definition requires the resident to be "*a supervisor of that building, operation, or plant.*" That resident/supervisor should not need a car for journey to work purposes, and accordingly, has slightly less need for a car than a resident of an ordinary Dwelling. Aside from this difference, the transport needs of residents would be effectively the same – residents would still need to travel for all other trips (to access services, leisure, etc).

A Caretakers Dwelling could be attached to a commercial use that has external employees, which may drive to the site for work and park on-site or off-site in the nearby area.

We understand that there are 29 individual lots on the site. Assuming all lots were used as Caretaker Dwellings, a highly conservative assumption would be that none of these dwellings would generate a work-based trip from the site by residents (this ignores that two working adults may reside in a lot with

one person working on-site and another off-site). There will also be trips associated with external employees arriving at the site. Based on the 2016 ABS Census data for the Collingwood SA2 area, 48% of workers in Collingwood drive to work.

Residents of lots used exclusively as dwellings would travel from the site to their place of work. Based on the 2016 ABS Census data for Collingwood, only 27% of employed persons travel by car for work purposes. This is reflective of the excellent transport options available to the site, including its high public transport access, its walkability and cycling connections.

Depending on the mix of dwellings and commercial uses, it is challenging to precisely quantify a before and after traffic generation estimate for the site if dwellings are permitted. However, we are generally satisfied that the difference in traffic generation as a result of changing from Caretaker's House and a regular Dwelling is not significant, with additional resident trips counterbalanced by the reduction in external worker trips.

Setting aside the consideration of existing traffic volumes generated by the existing uses on the site, the following reviews a scenario of 29 lots on the site being used only as dwellings. Dwellings in this location would be expected to generate in the order of 3 vehicle trips per day¹, with 10% of traffic generation occurring in the peak hours. This equates to a total 87 trips per day and 9 vehicle trips in the peak hours. This level of traffic is low and would not have a perceptible impact on traffic conditions in the area. This traffic is also split between the site entrances on Wellington Street and Northumberland Street.

In our view, it is not necessary to specifically consider the level of traffic is generated by the already permitted commercial uses on the site is. The question in this instance is what is the traffic impact of permitting the use of dwellings on the site and as set out in the paragraph above, in a 'worst case' scenario of considering all lots as dwellings, the traffic impacts are not significant.

Based on the above, we are satisfied that the difference in traffic impacts between 'Caretakers Dwellings' and 'Dwellings' is negligible.

¹ This is an average rate, with some dwellings having 1 car space and generating less than this rate and some dwellings having more than 1 car space and may generate higher than this rate.

6 Conclusion

Based on our various investigations, we are of the view that:

- a) From a statutory car parking perspective, allowing the use of dwellings on the site is acceptable, on the basis that:
 - i) Caretaker's Houses have the same statutory requirement as Dwellings.
 - ii) If the number of Dwellings exceeded the number of currently permitted Caretaker's Dwellings, a car parking reduction may be required (depending on the size of the dwelling and the number of allocated car spaces), which is acceptable under the decision guidelines of Clause 52.06-5 and consistent with current practice in the City of Yarra.
- b) The level of traffic generated by the site is not expected to change significantly by allowing the use of the lots as dwellings.

Overall, we are satisfied that there are no traffic engineering reasons why the application to allow dwellings at 26 Wellington Street & 21 Northumberland Street, Collingwood, should not be approved. Please contact myself or Leigh Furness at Traffix Group if you require any further information.

Yours faithfully,

TRAFFIX GROUP PTY LTD



Charmaine Dunstan
Director