



OFFICIAL

## WA Planning Manual

### Non-Residential Car Parking Rates in Perth and Peel

#### Consultation Outcomes Report

July 2024





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## Acronyms/Abbreviations

- Action Plan – Action Plan for Planning Reform
- Department – Department of Planning, Lands and Heritage
- DoT – Department of Transport
- Guidance – Guidance for Non-Residential Car Parking Rates in Perth and Peel
- Regulations – *Planning and Development (Local Planning Schemes) Regulations 2015*
- SPP4.2 – State Planning Policy 4.2 Activity Centres
- SPP7.2 – State Planning Policy 7.2 Precinct Design
- WALGA – Western Australian Local Government Association



### 1. Introduction

The 2019 Action Plan for Planning Reform (**Action Plan**) incorporates various actions aimed at achieving greater consistency across local planning frameworks. This includes an initiative to achieve a more consistent approach for the calculation of car parking requirements in commercial and mixed use centres.

Currently, the non-residential car parking rates adopted across metropolitan local governments in Perth and Peel, differ significantly for the same land uses across similar locations, and are not reflective of contemporary car parking needs. Further, the minimum rates are applied with the expectation that each development will meet its own car parking demand on-site. This results in a range of issues associated with the inappropriate provision of car parking and inefficient use of the land.

In October 2021, the Department of Planning, Lands and Heritage (**Department**) initiated a planning reform project to determine a more consistent approach to car parking requirements for non-residential land uses in Perth and Peel. As part of the implementation of this approach, Guidance has been developed which determines consistent car parking rates for non-residential land uses in activity centres and precincts, and service commercial and industrial zones in Perth and Peel.

The Guidance is intended to support any immediate review of car parking rates under a local planning framework in the short term. The rates are to be further reviewed in the long term, based on evidence-based research, in collaboration with the Western Australian Local Government Association (**WALGA**) and the Department of Transport (**DoT**).

The approach that was adopted, and informed the preparation of Guidance, was developed in collaboration with key stakeholders through preliminary consultation activities. These involved five workshops with representatives from the development industry, local government, State Government agencies, and community reference groups. These groups helped to shape and refine the proposed changes. A formal six-week consultation process was then undertaken to help refine the Guidance.

This report provides an overview of the consultation undertaken so far, a summary of the matters raised by stakeholders involved, and the outcomes from this process.

### 2. Background

The project to determine a consistent approach to non-residential car parking requirements has been progressing since 2021. The project is part of the implementation of the State Government's planning reform agenda and aims to increase consistency in the calculation of non-residential car parking requirements across metropolitan local government areas, within and between activity centres and precincts in Perth and Peel.

The purpose of the Guidance is to support the review of existing non-residential car parking rates under the local planning framework on zoned land in the Perth and Peel regions.

Specifically, the Guidance:

- (a) defines consistent car parking rates for non-residential land uses in activity centres and precincts, and service commercial and industrial zones; and



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- (b) provides details on the process to adopt and implement the car parking rates under a local planning framework.

The Guidance relates to and is informed by State Planning Policy 4.2 *Activity Centres (SPP4.2)*, State Planning Policy 7.2 *Precinct Design (SPP7.2)*, and Schedule 2 Part 9A of the *Planning and Development (Local Planning Schemes) Regulations 2015 (Regulations)* – Provisions about car parking.

The Guidance aligns with the State Government's planning reform agenda outlined in the Action Plan, and responds to the following goals and initiatives:

Goal: Planning systems are consistent and efficient

**Initiative C1: Local planning schemes are more consistent**

Desired outcome: *A standardised approach to zones, land use, permissibility, and development control to increase consistency, while retaining the ability for local governments and their communities to respond to local circumstances, such as heritage and character.*

**Initiative C2(ii): Car parking requirements in commercial and mixed use centres are consistent**

Desired outcome: *A state-wide consistent approach for provision of car parking that makes it easier for small businesses to establish in existing town centres, retail/café corridors and other commercial and mixed-use centres.*

In developing the Guidance, the Department consulted with key stakeholders to provide feedback on potential approaches and identify matters that require further clarity.

### 3. Engagement/Consultation Process and Objectives

The purpose of preliminary engagement and consultation was to help inform, shape, and refine the development of a more consistent approach to non-residential car parking rates, and to provide feedback and input on the recommended approach for implementation.

The objectives of the engagement process were to:

- consider options for determining and implementing contemporary car parking requirements,
- refine and confirm the recommended approach, including details on the implementation process and,
- ensure any associated guidance produced is contemporary, easy to understand and fit-for-purpose.

Engagement and consultation for the project was undertaken in three stages, as outlined in the Table below.



Stage	Detail
<p>Preliminary consultation with stakeholders</p> <p>December 2021 and March to April 2022</p>	<ul style="list-style-type: none"> <li>• A total of five workshops were held with stakeholders to help consider options and develop a preferred approach for how car parking requirements are defined and implemented.</li> <li>• The stakeholders included key representatives from within the Department, various State Government agencies, WALGA, local government, peak industry bodies and associations, planning, transport and architecture consultants, and the community.</li> </ul>
<p>Consultation on the draft car parking rates</p> <p>March to May 2023</p>	<ul style="list-style-type: none"> <li>• Consultation with key stakeholders was undertaken on the proposed car parking rates and their implementation, to refine and improve the Guidance.</li> <li>• The Guidance was made publicly available on the WA Government website for stakeholders to review and comment.</li> <li>• Targeted communications with key stakeholders including all local governments, peak industry bodies and associations, State Government agencies, and consultants.</li> <li>• Two online information sessions were held for stakeholders to attend which provided an overview of the project and outlined the technical analysis which was undertaken.</li> </ul>
<p>Post-consultation activities (on-going)</p>	<ul style="list-style-type: none"> <li>• Ongoing discussions with key stakeholders, to discuss the final changes and to help inform further improvements to support uptake of the Guidance.</li> </ul>

#### 4. Engagement/Consultation Activities

The following preliminary and formal consultation activities were undertaken.

Following preliminary consultation, the Guidance was refined and consulted on for a six-week period commencing 29 March 2023 and concluding 12 May 2023.

##### 4.1 Preliminary Engagement (Workshops)

The first stage of preliminary consultation was undertaken in December 2021, via a **series of meetings** with the Department of Finance, Major Projects section, and the Department of Transport, Urban Mobility team, to discuss their experience with the management of non-residential car parking. Further meetings were conducted with the City of Stirling and Town of Victoria Park about their parking strategies, in March and April 2022. The aim was to inform the elements that the Guidance needed to address and how it was to be prepared.

The second stage of preliminary engagement was undertaken as **workshops** with stakeholders and teams within the Department in March and April 2022. The workshops included a main activity exercise where participants considered the car parking options (as outlined in the table below) and how these could be applied based on the centre/precinct and land use types.



Car parking options		Rationale (in summary)
<b>A. ON-SITE</b>		<b>Parking is situated on the site that generates the demand for parking</b>
A1	Status Quo	<ul style="list-style-type: none"> <li>Prevent on-site parking shortage and avoid spill-over onto other sites by adopting generous minimum standards (current situation) – often results in oversupply.</li> </ul>
A2	Right size minimums	<ul style="list-style-type: none"> <li>Prevent on-site parking shortage but refrain from promoting over-supply.</li> <li>Minimum parking requirements should closely match parking demand.</li> </ul>
A3	Right size minimums – mild maximums	<ul style="list-style-type: none"> <li>Same as A2 but also adopts maximums, at the previous generous minimums.</li> </ul>
<b>B. PRECINCT BASED</b>		<b>Park once and walk approach. Retains parking standards on-site but considers the availability and provision of parking across the precinct. Combined with priced parking and payment-in-lieu arrangements, it promotes use of public parking and requires on-street parking management</b>
B1	Variance Based	<ul style="list-style-type: none"> <li>Parking minimums apply on-site but some or all of the parking requirements can be waived in exchange for good design outcomes on a site.</li> <li>Some sites have more and other less parking.</li> </ul>
B2	Precinct Contribution	<ul style="list-style-type: none"> <li>Parking minimums apply on-site, but a proportion of the bays is mandated as a payment in lieu contribution.</li> </ul>
<b>C. RELAXED</b>		<b>Abolish minimum parking rates or adopt very low rates</b>
C1	Contribution minimums	<ul style="list-style-type: none"> <li>Provide reduced number of parking bays on-site.</li> <li>Seek contribution from some land uses for consolidated area parking.</li> </ul>
C2	Abolish minimums, no maximums	<ul style="list-style-type: none"> <li>Removes minimums – each development can set its own parking provision rate based on commercial assessment.</li> <li>Reliant on strong on-street parking management.</li> </ul>
C3	Abolish minimums, mild maximums	<ul style="list-style-type: none"> <li>Same as C2 but also sets maximums with no discretion to increase.</li> <li>Can be combined with other regimes.</li> </ul>
<b>D. MODE SHIFT</b>		<b>Used to achieve travel behaviour changes by significantly limiting car parking supply – suited to busy metropolitan centres</b>
D1	Maximums for mode shift	<ul style="list-style-type: none"> <li>Application of Perth Parking Management Controls (maximum allowance for parking per m<sup>2</sup> of lot area) – <i>Perth Parking Management Act 1999</i>.</li> <li>Volume of parking is based on site area and street type.</li> <li>Requires investment in alternative transport modes.</li> </ul>





Car parking options		Rationale (in summary)
D2	Precinct caps	<ul style="list-style-type: none"> <li>▪ Volume of parking is capped per precinct based on supply and demand.</li> <li>▪ Reliant on access by public transport and other modes.</li> <li>▪ Relies on strong car parking management regimes (e.g. on-street parking including some paid parking).</li> </ul>
D3	Campus caps	<ul style="list-style-type: none"> <li>▪ Same as C3 but applies to specific uses with high travel demand (e.g. universities, key entertainment sites).</li> </ul>

The workshop outcomes are summarised as follows:

- Retention of the status quo (option A1) that contributes to overprovision of on-site parking was generally not supported.
- Precinct based options (option B) were considered more appropriate for a variety of centres and land uses, particularly for higher order activity centres with better accessibility.
- Refined parking minimums (options A2 and A3) were considered as an option for some types of centres or for areas where there was an agglomeration of land uses outside activity centres, like in industrial areas.
- Stakeholders were sceptical of a relaxed approach (option C) or mode shift approach (option D1) across Perth and Peel as this could add complexity to the system and likely result in the need for changes to legislation. This does not reflect central Perth where the *Perth Parking Management Act 1999* (PPMA) is appropriate to manage transport demand and land use planning outcomes.
- For neighbourhood centres, continued overprovision of on-site parking would remove the opportunity to facilitate non-vehicle movements, remove the imperative on local government to manage on-street parking and not contribute to the creation of great local spaces. As such, the retention of a status quo approach (option A1) was not favoured.
- A consistent theme raised by stakeholders was the ability to transition from the existing framework into any of the options being considered. This is crucial in ensuring that the stepped change in the medium to long term is not undermined by any implications from the short term approach.
- There is not a one-size-fits-all approach to implementing contemporary parking regimes that seems appropriate for the entirety of Perth and Peel. There are, however, options already implemented within the planning system that should form the basis for contemporary controls for future non-residential development.

## 4.2 Consultation on the Draft Guidance

Following preliminary engagement, an approach for the calculation of consistent car parking rates was developed to assist in transitioning from the current car parking regimes. This approach includes:

- (a) a separate, precinct-based approach to car parking, and
- (b) minimums and maximums rates for all types of land uses, including outside of activity centres and precincts.



Subsequently, Interim Guidance was developed to determine consistent car parking rates for non-residential land uses in Perth and Peel. The purpose of the Guidance is to support any immediate review of car parking rates under a local planning framework, while a more comprehensive longer-term review of car parking rates is completed. The Guidance provides **minimum and maximum car parking rates** which can be applied to non-residential uses in the following areas:

- Commercial/Mixed Use areas in activity centres and precincts
- Service Commercial zone
- Industrial zones including Light Industry, General Industry, Strategic Industry, and Industrial Development.

The Guidance was proposed to be implemented by local governments under the local planning framework, via a local planning policy, standard structure plan, precinct structure plan and/or local development plan.

The Guidance was subject to broad consultation for a period of six weeks, from 29 March 2023 to 12 May 2023. Targeted communications were sent to stakeholder groups including all local governments, peak industry bodies and associations, relevant State Government agencies, and consultants. The consultation period was communicated via email correspondence, the Departments website, and Consultation Hub portal. The following information was also made available and was distributed to stakeholder groups during the consultation period:

- Car parking requirements for non-residential land uses in Perth and Peel – draft Interim Guidance
- Car parking requirements for non-residential land uses in Perth and Peel – Background Report
- Project overview and frequently asked questions
- Feedback form to allow for a submission to be made (available online and in hard copy).

The Department also hosted two online information sessions for external stakeholders to discuss the proposed car parking rates and implementation approach, at the start of the consultation period (on 4 April 2023 and 6 April 2023). The information sessions provided an opportunity for stakeholders to receive a presentation on the Guidance and ask questions. The two information sessions were attended by over 55 stakeholders, from a wide range of organisations including various consultancies, local governments, and industry associations.

## 5. Consultation Outcomes

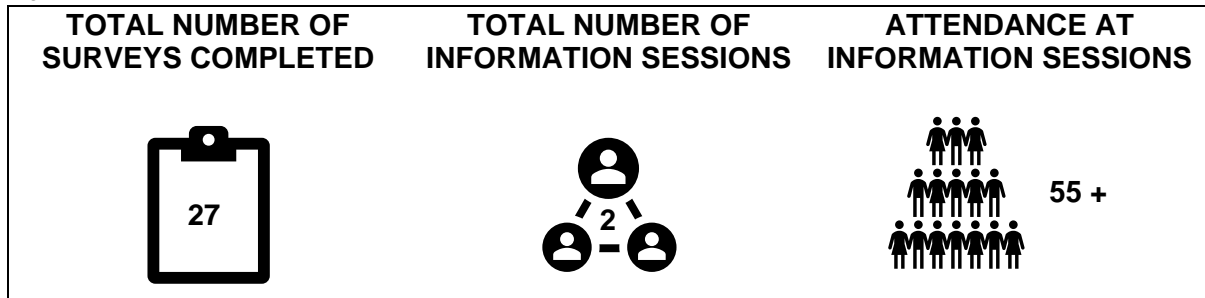
### 5.1 Consultation Overview

At the conclusion of the consultation period, a total of 27 submissions were received, which were predominantly from local governments (70%). These submissions were reviewed and analysed in detail to help identify refinements to be made to the Guidance.





Figure 1 – Consultation outcomes



A breakdown of submitters by sector is provided in Figure 2. This illustrates that feedback was received from a range of stakeholder groups involved, interested, or affected by the Guidance.

Figure 2 – Stakeholder groups



## 5.2 Key Findings

The submissions received raised the following key themes:

- Improvements are needed to provide greater clarity and increase the usability of the Guidance document
- Concerns that there is insufficient evidence to support the car parking rates, including concerns that the rates were too low/high, how the approach would work in outer metropolitan regions, and requests to remove the minimum/maximum requirement.
- Clarity is sought on the implementation of the Guidance, including via development assessment with respect to how to assess and determine the required car parking using minimum and maximum rates
- Clarity is sought on how car parking rates adopted under a local planning scheme can be varied using Schedule 2 Part 9A of the Regulations.



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- Requests for the inclusion of additional forms of parking including electric vehicles, bicycle parking, motorcycles, and electric scooters.

In addition to the above, several comments related to the car parking rates for specific land uses. The table below summarises the key matters raised in the submissions.

Subject	Key Themes
<b>Clarity and ease of use</b>	<ul style="list-style-type: none"> <li>▪ The document is difficult to interpret.</li> <li>▪ Using more direct language could be beneficial and help improve the usability of the document.</li> <li>▪ Clarify how the rates can be used and applied under a local planning framework.</li> </ul>
<b>Evidence to support the car parking rates</b>	<ul style="list-style-type: none"> <li>▪ The lower car parking rates have not been backed by empirical evidence, such as a parking survey or a transport assessment.</li> <li>▪ The proposed method to calculate car parking requirements may result in issues at the implementation stage, particularly where rates are based on the number of persons accommodated. Car parking calculations based on floor area allow for an objective assessment to be undertaken based on the submitted plans.</li> <li>▪ The rates for district centre or higher appear to be an arbitrary figure which does not consider the car parking generated from specific land uses.</li> <li>▪ The rates have not been prepared by a technical specialist.</li> <li>▪ The rationale behind the rates is not clear.</li> <li>▪ The rates are lower/higher than required under a local planning scheme currently in force.</li> <li>▪ The rates should be higher to accommodate outer metropolitan local government areas which are not well serviced by alternative modes of transport.</li> <li>▪ The rates are considered too low/high.</li> <li>▪ A higher rate should apply to high intensity land uses.</li> <li>▪ A flat ratio with a lower requirement should be applied within lower order precincts and activity centres.</li> <li>▪ A minimum parking rate of zero should be applied to the industrial zones.</li> <li>▪ The rates will result in an excess amount of car parking being provided.</li> <li>▪ Local governments should be able to remove minimum/maximum rates, with only a minimum/maximum being applicable.</li> <li>▪ Removal of minimum parking requirements is the ultimate policy solution.</li> <li>▪ There is no need to require maximum parking rates.</li> <li>▪ Maximum rates will limit the ability for developers to provide additional parking which may be required in the future.</li> </ul>
<b>Implementation</b>	<ul style="list-style-type: none"> <li>▪ Clarification is needed on how the rates would be applied under the local planning framework, as this is not a statutory document.</li> <li>▪ Details are to outline how a minimum and maximum rate is assessed for a development.</li> </ul>



	<ul style="list-style-type: none"> <li>Clarification is needed on how the parking rates form part of structure plans.</li> <li>It is unclear how the Guidance relates to the parking provisions under the Regulations.</li> </ul>
<b>Clarity on variations under Schedule 2 Part 9A of the Regulations</b>	<ul style="list-style-type: none"> <li>Clarity is sought on how variations can be considered to the local planning framework under the Regulations.</li> <li>The relationship between the Guidance and Regulations is not clear.</li> </ul>
<b>Additional forms of parking</b>	<ul style="list-style-type: none"> <li>The Guidance should require rates for electric vehicles, bicycle parking, motorcycles, and electric scooters.</li> <li>Provision of end of trip facilities should be included.</li> <li>Consider including a rate for the number of universal parking spaces required in a development.</li> </ul>

These themes are discussed further below. A full schedule of submissions is provided in Appendix 1.

## 6. Recommendations and Next Steps

The detail outlined in Section 5 (above) and Appendix 1 of this report was considered when determining how to proceed. The final changes to the Guidance document, including refinements post consultation, are summarised in the Table below.

Subject	Response to Key Themes
<b>Clarity and ease of use</b>	<ul style="list-style-type: none"> <li>Changes have been made to improve clarity and simplify the information contained within the Guidance document.</li> <li>The content has been restructured to improve legibility and useability.</li> <li>Footnotes have been included which demonstrate the link between the Guidance and SPP4.2, SPP7.2, and the Regulations.</li> <li>Terms have been clarified to assist with implementation occurring in a consistent manner.</li> <li>Reference to the Regulations has been included for clarity.</li> <li>A detailed implementation section has been provided, which outlines the potential options for how the Guidance can be applied.</li> <li>Several textual changes have been undertaken where requested, to improve clarity.</li> </ul>
<b>Evidence to support the car parking rates</b>	<ul style="list-style-type: none"> <li>The parking rates across 14 local government areas in the Perth and Peel regions were examined, including outer metropolitan councils. This revealed that there is no clear method of standardisation which has been used across local governments to determine the rates.</li> <li>Research undertaken by WALGA indicates that the rates adopted by local government areas have been amended over time through trial and error and/or to match other rates of an adjoining local government area.</li> </ul>



Subject	Response to Key Themes
	<ul style="list-style-type: none"> <li>▪ The rates have been developed based on a project approach and methodology. The rates are responsive to the different characteristics of non-residential areas based on accessibility, employment type and spacing of uses; and as such a separate approach applies to activity centres and precincts, service commercial and industrial zones.</li> <li>▪ A new section on data collection has been added to support the testing and review of the non-residential car parking rates. The data which is collected will be used to evaluate options for a longer-term approach to non-residential car parking, in collaboration with WALGA and the Department of Transport.</li> <li>▪ The Guidance provides flexibility for area specific rates to be developed and implemented, which are based on the locality and anticipated demand of the land use/business.</li> <li>▪ The rates have been determined to address the overprovision of parking and contribute to the more efficient use of land.</li> <li>▪ The rate applicable to a district centre or higher has been updated to provide for a minimum of zero.</li> <li>▪ Minimum rates are required to be adopted (instead of zero), for payment in lieu of parking to apply.</li> <li>▪ There is a need for consistency in the rates applied, whereby a maximum rate will assist in achieving this.</li> </ul>
<p><b>Implementation</b></p>	<ul style="list-style-type: none"> <li>▪ A detailed implementation section has been provided, which outlines the potential options for how the Guidance can be applied.</li> <li>▪ A clear implementation pathway has been outlined, via the preparation of a local planning policy to adopt the suggested approach and rates, or via the preparation of a structure plan or local development plan.</li> <li>▪ Where car parking rates remain under a local planning scheme, the rates in the Guidance can be considered at the development application stage as acceptable variations to the minimum on-site car parking requirements, in accordance with Schedule 2, Part 9A, clause 77D of the Regulations.</li> <li>▪ Clarity has been provided on how to assess the car parking rates.</li> </ul>
<p><b>Clarity on variations under Schedule 2 Part 9A of the Regulations</b></p>	<ul style="list-style-type: none"> <li>▪ The implementation section of the Guidance has been updated to address the Regulations.</li> <li>▪ The rates contained in the Guidance may be an acceptable variation to the rates under a local planning scheme on a case-by-case basis, which is assessed as part of the development assessment process.</li> <li>▪ The Guidance outlines that Schedule 2, Part 9A, clause 77D of the Regulations provides for variations to the minimum on-site car parking requirements under local planning schemes, in certain circumstances, with consideration being given as to whether adequate car parking has been provided.</li> </ul>

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Subject	Response to Key Themes
<b>Additional forms of parking</b>	<ul style="list-style-type: none"><li>▪ Rates for bicycle parking, end-of-trip facilities, electric vehicles, and scooters are not within the scope of this project.</li><li>▪ The Building Code of Australia provides a rate for the provision of universal parking.</li></ul>



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## Planning Reform



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### **Appendix 1 – Consultation Feedback Form**





# Planning Reform

Proposed Amendments - Planning & Development (Development Assessment Panel) Regulations 2011

## Draft Interim Guidance for Non-Residential Car Parking – Consultation

### SUBMISSION

The Department of Planning, Lands and Heritage requests your comments on the proposed draft interim guidance for non-residential car parking (draft guidance).

This proposal is open for comment until midnight, Friday 12 May 2023. The following feedback form is provided as a guide for a submission on the proposal.

This feedback form has been prepared in three (3) parts. Please include your feedback about the interim guidance, including the car parking rates contained in Appendix A to C of this document in Part A, the proposed implementation measures in Part B, general feedback in Part C, and any other feedback in Part D.

Please email a completed form to [planningreform@dplh.wa.gov.au](mailto:planningreform@dplh.wa.gov.au).

### Submitters Details:

<b>Name</b>	Insert Name
<b>Email address</b>	Insert Email
<b>Are you submitting on behalf of an organisation?</b>	
Choose an item	
<b>Organisation name (if applicable)</b>	
Insert Org Name	
<b>Submitter/Organisation type</b>	
Choose an item.	
<b>Submissions may be published as part of the consultation process. Do you give permission for your name and your organisation's name (if applicable) to be published?</b>	Choose an item.





# Planning Reform

## Overview:

As part of the implementation of the State Government's planning reform agenda, work has progressed to develop a more consistent approach, improve outcomes, and enhance guidance relating to non-residential car parking within precincts<sup>1</sup>, activity centres<sup>2</sup>, industrial<sup>3</sup> zones and land zoned Service Commercial<sup>4</sup> across local government areas in the Perth and Peel region.

Draft guidance has been developed to support local governments in an immediate review of car parking rates in their locality. This guidance is targeted at local governments within the Perth and Peel region, however where appropriate, this guidance can also be applied to areas external to this region.

This guidance has been developed based on background research, the outcomes of a technical review and early engagement with stakeholders. Consultation is being undertaken to help with the refinement of the guidance, including the car parking rates contained in Appendix A to C of this document.

## Comments:

### PART A – INTERIM CAR PARKING GUIDANCE

*(Section 2, and Appendix A – D of the Draft Guidance)*

The draft guidance recommends local government authorities (**LGA**) to apply the following car parking approach:

- An overall parking cap across an entire precinct<sup>1</sup> or activity centre<sup>2</sup> (district centre level or higher) as per the guidance and requirements set out within State Planning Policy 4.2 Activity Centres (**SPP 4.2**) and State Planning Policy 7.2 Precinct Design Guidelines (**SPP 7.2**). This approach is not proposed to be changed.
- A car parking ratio to be established for all non-residential land uses within a precinct<sup>1</sup> or activity centre<sup>2</sup> at district centre level or higher (as outlined in SPP 4.2). See below for further details.
- Car parking rates set out in **Appendix A** of the draft guidance to apply to non-residential land uses within precincts<sup>1</sup> and activity centres<sup>2</sup> lower than a district centre level (as outlined in SPP 4.2).
- Car parking rates set out in **Appendix B** and **Appendix C** of the draft guidance to apply to the Service Commercial<sup>3</sup> and industrial<sup>4</sup> zones to the land use classifications.
- Within the Service Commercial<sup>3</sup> and industrial<sup>4</sup> zones, LGA's allow for discretion to vary the rates outlined for those land use classifications set out in **Appendix D**.
- Where land uses are not explicitly included, LGA are to recommend minimum and maximum car parking rates based on empirical data.

1. 'Precinct/s' are as per the definition contained within Part 6, Clause 37 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.

2. 'Activity centre/s' are as per the definition contained within Part 1, Clause 1 within Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015.

3. 'Industrial' encompasses all types of industrial zones as set out within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015, e.g. Light Industry, General Industry, Strategic Industry and Industrial Development.

4. 'Service Commercial' zone is as per Part 3, Clause 16 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.





# Planning Reform

Proposed Amendments - Planning & Development (Development Assessment Panel) Regulations 2011

## 1. RATIO FOR PRECINCTS/ACTIVITY CENTRES AT A DISTRICT CENTRE LEVEL OR HIGHER

*(Section 2 of the Draft Guidance)*

Within precincts<sup>1</sup> and activity centres<sup>2</sup> of a district centre level or higher (refer to SPP 4.2) located in the Perth and Peel region, a car parking ratio is to be established for all non-residential land uses as follows:

- A minimum of zero where this is already established.
- Where a minimum is not established, one parking bay per 100m<sup>2</sup> of floor area.
- A maximum of one parking bay per 25m<sup>2</sup> of floor area.

**1a. Do you support this approach for non-residential car parking within precincts<sup>1</sup>/activity centres<sup>2</sup> at a district centre level or higher?**

Choose an item.

**1b. Please outline any suggested improvements or comments below:**

Insert improvements or comments here

## 2. RATES FOR PRECINCTS/ACTIVITY CENTRES LOWER THAN A DISTRICT CENTRE LEVEL

*(Section 2 and Appendix A of the Draft Guidance)*

Within precincts<sup>1</sup> and activity centres<sup>2</sup> of a level lower than a district centre (refer to SPP 4.2) within the Perth and Peel region, the rates set out in **Appendix A** of the draft guidance are to form the basis for determining parking requirements for non-residential land uses. Considerations must be based on the requirements of SPP 7.2 (refer to Design Element 4: Movement).

**2a. Do you support the car parking rates proposed in Appendix A, to be applied to non-residential land uses within precincts<sup>1</sup>/activity centres<sup>2</sup> lower than a district centre?**

Choose an item.

**2b. Please outline any suggested improvements or comments below:**

Insert improvements or comments here

1. 'Precinct/s' are as per the definition contained within Part 6, Clause 37 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.
2. 'Activity centre/s' are as per the definition contained within Part 1, Clause 1 within Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015.
3. 'Industrial' encompasses all types of industrial zones as set out within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015, e.g. Light Industry, General Industry, Strategic Industry and Industrial Development.
4. 'Service Commercial' zone is as per Part 3, Clause 16 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.





# Planning Reform

Proposed Amendments - Planning & Development (Development Assessment Panel) Regulations 2011

### 3. RATES FOR THE SERVICE COMMERCIAL AND INDUSTRIAL ZONES

(Section 2, Appendix B and Appendix C of the Draft Guidance)

Within the Service Commercial<sup>3</sup> and industrial<sup>4</sup> land use zones, appropriate minimum and maximum car parking rates are to be established for all non-residential land use categories based on the rates set out in **Appendix B** and **Appendix C** of the draft guidance.

**3a. Do you support the car parking rates proposed in Appendix B, to be applied to non-residential land use categories within the Service Commercial<sup>3</sup> zone?**

Choose an item.

**3b. Please outline any suggested improvements or comments below:**

Insert improvements or comments here

**3c. Do you support the car parking rates proposed in Appendix C, to be applied to all non-residential land use categories within industrial<sup>4</sup> zones?**

Choose an item.

**3d. Please outline any suggested improvements or comments below:**

Insert improvements or comments here

1. 'Precinct/s' are as per the definition contained within Part 6, Clause 37 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.
2. 'Activity centre/s' are as per the definition contained within Part 1, Clause 1 within Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015.
3. 'Industrial' encompasses all types of industrial zones as set out within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015, e.g. Light Industry, General Industry, Strategic Industry and Industrial Development.
4. 'Service Commercial' zone is as per Part 3, Clause 16 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.





# Planning Reform

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## 4. DISCRETION WITHIN THE SERVICE COMMERCIAL AND INDUSTRIAL ZONES

*(Section 2, Appendix D of the Draft Guidance)*

Within Service Commercial<sup>3</sup> and industrial<sup>4</sup> zones, discretion based on individual assessment by the LGA is to be allowed for those non-residential land use classifications set out in **Appendix D** of the draft guidance. The use of discretion for some land uses is accepted in these zones given the potential for unique forms of land use with specific or minimal parking demands (i.e.

Telecommunications Infrastructure) or where the scale of the land use may fluctuate substantially and therefore applying a range of parking parameters may limit development scale (i.e. a warehouse or logistics centre or a garden centre where the scale / type of activity may vary significantly). Those cases should be dealt with on an individual basis, citing examples or demand calculations by an applicant.

**4a. Do you support the non-residential land uses outlined in Appendix D, that local governments will have discretion to vary?**

Choose an item.

**4b. Please outline any suggested improvements or comments below:**

Insert improvements or comments here

## 5. LAND USE CATEGORIES THAT ARE NOT EXPLICITLY INCLUDED

*(Section 2 of the Draft Guidance)*

Where land use categories are not explicitly included, LGA are to recommend minimum and maximum car parking rates based on empirical data.

**5a. Do you support this approach?**

Choose an item.

**5b. Please outline any suggested improvements or comments below:**

Insert improvements or comments here

1. 'Precinct/s' are as per the definition contained within Part 6, Clause 37 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.
2. 'Activity centre/s' are as per the definition contained within Part 1, Clause 1 within Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015.
3. 'Industrial' encompasses all types of industrial zones as set out within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015, e.g. Light Industry, General Industry, Strategic Industry and Industrial Development.
4. 'Service Commercial' zone is as per Part 3, Clause 16 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.







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# Planning Reform

## PART B – IMPLEMENTATION

*(Section 3 of the Draft Guidance)*

Once finalised, the draft guidance is proposed to be implemented by LGA through Local Planning Policies, standard structure plans and precinct structure plans.

The guidance should be considered as part of strategic planning frameworks as follows:

- Part 2 of the Local Planning Strategy (under the theme ‘economy’) should consider the general principles of the guidance.
- Part 1 of the Local Planning Strategy should determine priorities and/or give direction for the preparation of a local planning policy on non-residential car parking. LGA may seek to specifically highlight an action to prepare non-residential parking assessments/management plans as part of a precinct or standard structure plan for a planning area identified.

Consideration should be given to reviewing precinct or standard structure plans, activity centre plans, and/or local development plans that have already been approved by the Western Australian Planning Commission (WAPC) under the requirements of SPP 4.2 or SPP 7.2. The proposed approach outlined within the draft guidance may be implemented through an amendment where the parking rate within those plans requires a greater number of parking bays to be provided than recommended in the draft guidance.

Where an existing precinct or standard structure plan, activity centre plan, and/or local development plan developed under the requirements of SPP 4.2 or SPP 7.2 does not include a maximum level of car parking, these must be adopted by means of an amendment.

**6a. Do you support this implementation approach?**

Choose an item.

**6b. Please outline any suggested improvements or comments below:**

Insert improvements or comments here

1. ‘Precinct/s’ are as per the definition contained within Part 6, Clause 37 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.
2. ‘Activity centre/s’ are as per the definition contained within Part 1, Clause 1 within Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015.
3. ‘Industrial’ encompasses all types of industrial zones as set out within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015, e.g. Light Industry, General Industry, Strategic Industry and Industrial Development.
4. ‘Service Commercial’ zone is as per Part 3, Clause 16 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.







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# Planning Reform

## PART C – GENERAL

This project responds to the following goals and initiatives of the [Action Plan for Planning Reform](#) (2019):

- *GOAL: Planning systems are consistent and efficient*
  - *Initiative C1. Local planning schemes are consistent.*
  - *Initiative C2 (ii). Car parking requirements in commercial and mixed-use centres are consistent.*

**7a. Do you think this will bring a more consistent approach to non-residential car parking in the Perth and Peel region?**

Choose an item.

**7b. If no, please explain your below:**

Insert improvements or comments here

**7c. Are there any other areas of guidance you would like to be provided on the topic of non-residential parking in precincts<sup>1</sup>, activity centres<sup>2</sup>, the Service Commercial<sup>3</sup> zone and/or industrial<sup>4</sup> zones?**

Insert comments here

1. 'Precinct/s' are as per the definition contained within Part 6, Clause 37 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.
2. 'Activity centre/s' are as per the definition contained within Part 1, Clause 1 within Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015.
3. 'Industrial' encompasses all types of industrial zones as set out within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015, e.g. Light Industry, General Industry, Strategic Industry and Industrial Development.
4. 'Service Commercial' zone is as per Part 3, Clause 16 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.





# Planning Reform

Proposed Amendments - Planning & Development (Development Assessment Panel) Regulations 2011

## PART D – OTHER FEEDBACK

**9. Do you have any other feedback? Please outline any other suggested improvements or comments below:**

Insert suggested improvements or comments here

**THANK YOU FOR YOUR FEEDBACK.**

Please email a completed form to [planningreform@dplh.wa.gov.au](mailto:planningreform@dplh.wa.gov.au).

1. 'Precinct/s' are as per the definition contained within Part 6, Clause 37 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.
2. 'Activity centre/s' are as per the definition contained within Part 1, Clause 1 within Schedule 2 (Deemed Provisions) of the Planning and Development (Local Planning Schemes) Regulations 2015.
3. 'Industrial' encompasses all types of industrial zones as set out within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015, e.g. Light Industry, General Industry, Strategic Industry and Industrial Development.
4. 'Service Commercial' zone is as per Part 3, Clause 16 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.





OFFICIAL

## Planning Reform



WA Planning Manual – Guidance on Non-Residential Car Parking Rates – Consultation Outcomes Report

### **Appendix 2 – Schedule of Submissions**



Relevant Section of the Guidance	Theme	Submissions		DPLH Response (Draft Modified   No Change   Monitor Implementation   Future Consideration)
		Number Received	Summary	
General	Alignment with WALGA guidance	7	<ul style="list-style-type: none"> <li>- The car parking rates align with recommendations made in the existing literature, including WALGA's Car Parking Guideline.</li> <li>- Providing a set of recommended minimum and maximum car parking rates aligns with the incremental policy reform suggested by WALGA and provides a very useful resource for local governments who are seeking to review their car parking requirements.</li> </ul>	<b>No change.</b> Noted.
	Standardisation of car parking rates	3	<ul style="list-style-type: none"> <li>- The standardisation of car parking rates is supported as there is currently no real evidence on how the car parking rates have been developed. The Guidance document provides a good rationale for the car parking rates.</li> </ul>	<b>No change.</b> Noted.
	Additional land uses to be included	5	<ul style="list-style-type: none"> <li>- The range of land uses which occur within activity centres and precincts and within the service commercial and industrial zones varies across local governments. Consideration should be given to including additional land uses within each appendix to assist with obtaining greater consistency across local government areas.</li> </ul>	<b>No change.</b> The typical land uses which align with the zones and the Model Provisions have been included. Section 4 of the Guidance has been updated clarify that there is flexibility for rates to be developed and implemented, which relate to land uses within the local government area which are not included in the Appendices.
	Car parking caps	4	<ul style="list-style-type: none"> <li>- Car parking caps are generally supported.</li> <li>- Further guidance should be provided in relation to distinguishing between parking caps and maximum parking rates which are two different methodologies.</li> </ul>	<b>Draft modified.</b> The Guidance has been updated to clarify that the parking rates apply in addition to any precinct-wide parking cap required under SPP4.2 to determine the maximum amount of parking which can be provided in the precinct.
	Lack of certainty (Appendix D)	5	<ul style="list-style-type: none"> <li>- A base parking rate should be included for all land uses, as allowing for flexibility in the approach does not provide consistency and certainty under the local planning framework.</li> <li>- Fixed parking rates for all land uses will provide businesses with certainty when considering a particular site.</li> <li>- Providing for variations to the parking rates allows for an inconsistent approach to be implemented across local government areas.</li> <li>- Car parking rates for the land uses listed under Appendix D may result in an inconsistent rate being applied these land uses within the one local government area, as well as across local government areas.</li> <li>- The guidance provides for discretion which allows decision makers to vary the requirements. This approach is inconsistent with the Action Plan, which aims to implement consistent car parking rates for non-residential land uses.</li> </ul>	<b>No change.</b> The purpose of the Guidance is to support the review of existing non-residential car parking rates under the local planning framework. Appendix D lists the land uses within the service commercial and industrial zones which require a flexible approach due to the nature of the business operations. Once rates are adopted, variations are not encouraged unless under specific circumstances. Proposed variations should be supported by a car parking management plan and justification should be provided to outline why this rate is appropriate based on the locality and anticipated demand of the land use/business.
	Alignment with current requirements	4	<ul style="list-style-type: none"> <li>- The rates are generally consistent with the current approach to car parking, which provides for a reduced rate within precincts/activity centres with access to high frequency public transport.</li> <li>- The rates for the land uses are largely consistent with minimum car parking rates under the local planning framework.</li> </ul>	<b>No change.</b> Noted.
	Inconsistent with current requirements	7	<ul style="list-style-type: none"> <li>- The rates are inconsistent with the rates under the local planning framework.</li> <li>- The rates are significantly lower than generally provided for lower order activity centres/precincts and within the service commercial zone, which have reduced access to public transport.</li> </ul>	<b>No change.</b> The parking rates across 14 local government areas in Perth and Peel were examined, which revealed that there is no clear method of standardisation. The rates have been determined to address the inappropriate provision of parking and inefficient use of land.
	Limited flexibility	6	<ul style="list-style-type: none"> <li>- There appears to be less opportunity for local government areas to apply location-specific car parking rates.</li> <li>- The rates reduce the flexibility for properties to change their business activity over time and it may restrict trade by not allowing the expansion of a business if staff numbers affect the required number of parking spaces.</li> <li>- The Guidance does not allow discretion for a case-by-case assessment to be undertaken based on the local context of a development. It provides a standard approach and does not provide guidance to this rather vexing problem which varies significantly between inner and outer metropolitan local government areas.</li> <li>- Discretion should not be limited to specific land uses within the service commercial and industrial zones, as there will be instances where different land uses have a valid reason to provide less than the minimum rate. Decision makers should be empowered to exercise judgement and discretion in these instances rather than applying an inflexible blanket requirement.</li> </ul>	<b>Draft modified.</b> Section 4 of the Guidance has been updated to clarify that there is flexibility for area specific rates to be developed and implemented, based on the locality and anticipated demand.
	Further consultation	1	<ul style="list-style-type: none"> <li>- Further consultation should be undertaken on the Guidance once it has been amended and prior to implementing a final document.</li> </ul>	<b>Draft modified.</b> Further consultation will be undertaken prior to implementing a longer-term approach for non-residential car parking rates.
	Implications on redevelopment	1	<ul style="list-style-type: none"> <li>- Consideration should be given to any unforeseen implications that the Guidance may have on the redevelopment/refurbishment of older commercial buildings.</li> <li>- Ensure that the minimum and maximum rates do not disincentive adaptation of existing buildings due to a lesser or greater amount of parking existing on the site.</li> </ul>	<b>Draft modified.</b> Section 4 of the Guidance has been updated to clarify that there is flexibility for area specific rates to be developed and implemented, based on the locality and anticipated demand. Additionally, variations to the rates can occur under specific circumstances, whereby a decision maker can exercise discretion for a change of use to an existing building which has greater or lesser number of existing parking spaces.



Relevant Section of the Guidance	Theme	Submissions		DPLH Response (Draft Modified   No Change   Monitor Implementation   Future Consideration)
		Number Received	Summary	
	Consistency with the Model Provisions (land use terms)	3	<ul style="list-style-type: none"> <li>- Land uses term have been used which are not consistent with the land uses included in the Model Provisions under Schedule 1 of the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>.</li> <li>- Fast food outlet and lunch bar should be a singular land use to align with the Model Provisions under the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>.</li> <li>- Clarify the reference to a Logistics Centre in the text, as it is not a land use under the Model Provisions.</li> </ul>	<b>Draft modified.</b> The Guidance has been updated with the land use terms aligning with the Model Provisions under the Regulations.
	Meaningful engagement undertaken	1	<ul style="list-style-type: none"> <li>- This is an excellent example of meaningful engagement with stakeholders, allowing timeframes for data collection and scenario testing, involving knowledgeable third-party specialists, building on previous work undertaken by other organisations and agencies, and adopting low-cost and uncomplicated policy solutions. Given the resource constraints of local government planning departments, the Department is encouraged to continue to identify planning reforms that provide efficiencies for local governments.</li> </ul>	<b>No change.</b> Noted.
	Not applicable to local government area	3	<ul style="list-style-type: none"> <li>- There are no service commercial or industrial zones under the local planning framework within the Town of East Fremantle.</li> </ul>	<b>No change.</b> Noted.
	Payment in lieu of parking	6	<ul style="list-style-type: none"> <li>- The Guidance specifies that the payment in lieu of parking in not considered appropriate within the service commercial and industrial zones. Local planning schemes contain the provisions for the payment in lieu of parking and they do not specify which zones are appropriate.</li> <li>- Support for the flexible approach as it allows local governments to set minimum and maximum car parking rates, which retains the ability for the payment in lieu of parking to be conditioned on development applications.</li> <li>- The low minimum rates compromise the ability to fund dedicated parking areas due to the reduced ability to condition the payment in lieu of parking on development approvals.</li> </ul>	<b>Draft modified.</b> The Guidance has been updated to remove the reference to where the payment in lieu of parking is appropriate. The parking rates across 14 local government areas in Perth and Peel have been used to inform the rates proposed, to address the overprovision of parking and contribute to the more efficient use of land. A minimum rate has been retained to provide for the payment in lieu of parking to occur
	Resourcing	2	<ul style="list-style-type: none"> <li>- There are insufficient resources within local governments to separately review the local planning framework instruments for the purposes of implementing the car parking standards in the Guidance.</li> </ul>	<b>Draft modified.</b> Section 4 of the Guidance has been updated to clarify how the parking rates can be adopted under the local planning framework.
	Determining rates for land uses not included in Appendices B and C, and uses that are listed under Appendix D	11	<ul style="list-style-type: none"> <li>- Collecting empirical data for land uses not included in Appendices B and C could take up to twelve months. This timeframe is needed to ensure that the data captures the car parking demand over the peak and off-peak seasons, which would be a costly exercise.</li> <li>- Clarity is required in relation to the 'empirical data' to determine rates under Appendix D, including information on what would be considered acceptable.</li> <li>- Consider setting minimum and maximum car parking rates for the land uses in Appendix D. This would reflect that each of these land uses has a range of intensities and requirements.</li> <li>- Clarify if local governments can consider data collected in other local government areas, to determine their car parking rates, or if it can be made the responsibility of the applicant on a case-by-case basis.</li> </ul>	<b>Draft modified.</b> Section 3.2 of the Guidance has been updated to remove reference to empirical data and clarify that the rate for land uses which are not included in Appendices B and C, are to be established based on evidence-based data and a desktop analysis. Additionally, car parking rates under Appendix D may be determined through the development assessment process based on the scale of the development and/or the anticipated car parking demand to accommodate the specific business operations.
	Guidance for development assessment	12	<ul style="list-style-type: none"> <li>- The Guidance is useful to provide guidance when considering a development assessment.</li> <li>- The onus should be on the applicant to demonstrate an appropriate car parking rate as part of the development application.</li> </ul>	<b>Draft modified.</b> Section 4.2 of the Guidance has been updated to provide additional details on how the car parking rates can be considered in the development assessment process.
Clarity and ease of use	Format of rates	11	<ul style="list-style-type: none"> <li>- It is recommended that the car parking rates are provided in the same format, with all land uses being based on either a floor area or persons accommodated.</li> <li>- The <i>Planning and Development (Local Planning Schemes) Regulations 2015</i> defers the definition of floor area to the meaning given in the Building Code, which is inappropriate for use in a planning assessment. Car parking should be based on gross lettable area and net lettable area, with certain land uses being based on the number of occupants.</li> </ul>	<b>No change.</b> The rates are calculated using either floor area or number of persons accommodated, based on which is appropriate for the land use. The calculation based on floor area is to ensure consistency with terms used across the planning framework.
	Consolidate appendices	3	<ul style="list-style-type: none"> <li>- Consolidate Appendices A, B and C to avoid repetition as the rates and land uses occurring under each appendix are the same. One table would be more simple and easier for practitioners to use.</li> </ul>	<b>No change.</b> The Guidance has retained Appendices A, B and C to maintain clarity and align with the land uses which may be considered within the respective zones. The rates proposed under the appendices vary based on the location and the concentration of land uses; access to, and availability of alternative modes of transport; and the opportunity for reciprocal parking arrangements.
	Definitions	6	<ul style="list-style-type: none"> <li>- Definitions should be provided for public floorspace, public area, public space, and bar.</li> <li>- The inclusion of definitions would assist with improving clarity and the usability of the Guidance.</li> <li>- Clarification is needed on what is included when referring to persons accommodated, and whether this is inclusive of staff or is it only relating to customers.</li> <li>- It is unclear what is meant by a precinct at district level or higher, which makes the document difficult to use.</li> </ul>	<b>Draft modified.</b> The Guidance has been updated to improve clarity and use consistent terms with SPP4.2 and SPP7.2. Additionally, definitions have been provided as footnotes where necessary.
	Difficult to use/understand	18	<ul style="list-style-type: none"> <li>- The document is difficult to use and interpret.</li> <li>- The heading of Appendix A is inconsistent with the application specified in the Guidance.</li> <li>- Appendix D is difficult to interpret and should be clarified.</li> </ul>	<b>Draft modified.</b> The Guidance was advertised as relating to car parking requirements which has changed to reflect that it relates to the car parking rates, to clarify the purpose of the document.





Relevant Section of the Guidance	Theme	Submissions		DPLH Response (Draft Modified   No Change   Monitor Implementation   Future Consideration)
		Number Received	Summary	
				Additional changes have also occurred to improve clarity, remove inconsistencies, and simplify the information.
	Repetition of information	5	- Remove the duplicated land uses in the Appendices.	<b>Draft modified.</b> The Guidance has been updated to remove all duplications.
Clarity on variations under Schedule 2 Part 9A of the Regulations	Use of rates in development assessments	6	- Clause 77D, Part 9A of the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i> identifies that the decision maker may waive or vary the minimum on site car parking requirements in some circumstances. The Guidance should clarify that this option exists and provide guidance on how to determine when a reduced rate can be supported.	<b>Draft modified.</b> Section 4 of the Guidance has been updated to provide further clarity on how to implement the rates under a local planning framework, including the application of Part 9A of the Regulations.
Rates	Rates in industrial zones	1	- The rates for the industrial zones should be increased as they are not well serviced by public transport resulting in a car dependent community.	<b>Draft modified.</b> Section 4 of the Guidance has been updated to clarify that there is flexibility for area specific rates to be developed and implemented, which are based on the locality and anticipated demand.
	Incidental land uses	2	- Consideration should be given to car parking rates for incidental uses. - The rate for a bulky good showroom should provide for storage areas to be calculated at the warehouse/storage rate.	<b>No change.</b> The approach taken to determine the number of parking spaces for incidental land uses may be considered as part of the development assessment process, based on the merits of each proposal.
	Land use	10	<b>Appendix A:</b> - The minimum car parking rate for a Club Premises is too low. - The rate for Community Purpose is not supported as this is a high intensity land use which is likely to result in a car parking shortfall that impacts the surrounding areas. - It is recommended that the rate for Fast Food is increased and includes the queuing areas as parking spaces. - Hotels and Tavern are high intensity land uses which are likely to result in a car parking shortfall which will impact on the surrounding area. - The parking rate for a Small Bar and Tavern should be standardised as they generate a similar demand. - The rates for Restaurant/Café and Tavern vary significantly. - The car parking demand associated with retail development is highly variable and relates not only to the type and scale of the retail offering, but also the surrounding development. Retail parking requirements tend to be lower for large centres, where there are dense land uses nearby. This means that lower-density areas with neighbourhood and local centres are likely to have the highest demand for car parking. A car parking rate of one space per 50m <sup>2</sup> is not backed by evidence and should be increased to a minimum of one space per 25m <sup>2</sup> .	<b>No change.</b> The rates are based on accessibility, employment type and spacing of uses. The parking rates across 14 local government areas in the Perth and Peel regions have been used to inform the rates proposed, to address the overprovision of parking and contribute to the more efficient use of land. A new section on data collection has also been added to support the testing and review of the rates, which will be used to determine a longer-term approach, in collaboration with WALGA and the Department of Transport.
		5	<b>Appendix B:</b> - The maximum car parking rate for a Betting Agency seems excessive as the nature of this business leans more towards an online business. Consideration should be given to this land use occurring as an incidental use. - It is recommended that the car parking rate for Motel is increased to align with the rate which is applicable for a Hotel. - A rate should be provided for Display Homes as they often result in cars parking on the verge and road, in locations which block the driveways of the surrounding residential properties. - Consideration whether Telecommunications Infrastructure should be included as an example when it typically does not require parking.	<b>Draft modified.</b> These land uses have been removed from Appendix B as they are not appropriate land uses within the Service Commercial zone.
		2	<b>Community purpose:</b> - Clarification is required on how to determine the 'at discretion' maximum rate for the Community Purpose land use under Appendix A. Details are also required on how this should be implemented.	<b>Draft modified.</b> The Guidance has been updated to improve clarity and indicate that the rate for particular land uses are appropriate to be based on the scale of the development and/or the anticipated car parking demand based on the business operation. Section 4 has also been updated to provide clarity on how to implement the rates under a local planning framework.
		9	<b>Child-care premises:</b> - The rate is not supported given the high car dependency and intensity of vehicle movements associated with drop off and pick up. - The rate for employees should be increased from 0.5 spaces per employee to one space per employee.	<b>No change.</b> The Guidance aligns with the draft Position Statement: Child Care Premises.
		2	<b>Consulting Rooms, Medical Centre, and Veterinary Centre:</b> - The rate under Appendix A should be increased to a maximum of six spaces per practitioner. - It is recommended that the car parking rates for Medical Centre and Consulting Rooms is based off the number of consulting rooms rather than the number of practitioners. - The rates for all health-related land uses are not supported given their increased car dependency.	<b>Draft modified.</b> The Guidance has been updated as follows: - Appendix A of the Guidance has been updated to reflect a maximum rate of six spaces per practitioner.





Relevant Section of the Guidance	Theme	Submissions		DPLH Response (Draft Modified   No Change   Monitor Implementation   Future Consideration)
		Number Received	Summary	
			- The parking rate should be standardised for these land uses as they generate a similar demand.	- Appendix B of the Guidance has been updated to reflect a consistent minimum and maximum rate for these land uses. - The rates for consulting rooms, medical centre and veterinary centre have been removed from Appendix C as they are not an appropriate land use within the industrial zones.
		19	<b>Educational establishment:</b> - Car parking for Educational Establishments is often problematic. It is recommended a standard rate is included for Educational Establishments which are located on non-commercial land, and which aligns with the Department of Education's parking requirements, including a kiss'n'ride/drop off area. - The car parking rates fail to consider smaller scale educational establishments, as well as educational establishments targeted at adults which have a greater car dependency. - It is recommended that a rate is included to cater for the growing number of industrial training facilities that operate in industrial areas. - It is recommended the rate is reviewed and that Auditoriums/Stadiums are considered as a separate land use where they are open to the public.	<b>No change.</b> The rates for educational establishment align with the Department of Education's requirements and are to be calculated based on the land use or land uses proposed. The Guidance outlines that there is the flexibility for area specific rates to be developed and implemented, which are based on the locality and anticipated demand which may be applicable for industrial training facilities.
		19	<b>Industry and Industry – light:</b> - It is recommended that a car parking rate relating to the number of employees is included, with the car parking rate being calculated based on either the floor area or the number of employees, whichever is greater. - The minimum rate of one space per 100m <sup>2</sup> can be onerous. It is recommended that further consideration is given to whether there is a need to impose a minimum rate. - Consider requiring a minimum number of car parking spaces per unit/tenancy to address change of uses, including 'P' use exemptions (i.e., factory units). <b>Motor Vehicle Repair:</b> - It is recommended that a car parking rate relating to the number of employees is included, with the car parking rate being calculated based on either the floor area or the number of employees, whichever is greater. - Consideration should be given to the number of vehicles intended to be stored at a premise to prevent cars from overflowing onto the verge and street. - The rate for motor vehicle repair should refer to the number of service bays rather than floor area to provide a more accurate provision. <b>Shopping Centre:</b> - A flat rate should be included for land uses that form part of a shopping centre or small precinct/activity centre, to reflect the reciprocal parking which occurs between the land uses. <b>Transport Depot:</b> - Consider including a standard rate for a transport depot. - Consideration should be given to including the transport depot land use within Appendix D. <b>Warehouse/Storage:</b> - It is recommended that the rate is amended to be calculated based on either the floor area or the number of employees, whichever is greater.	<b>Draft modified.</b> Section 4 of the Guidance has been updated clarify that there is flexibility for area specific rates to be developed and implemented, which are based on the locality and anticipated demand.
		1	<b>Office:</b> - A car parking rate of one space per 200m <sup>2</sup> is not backed by evidence and should be increased to a minimum of one space per 50m <sup>2</sup> net lettable area.	<b>No change.</b> A minimum rate of one space per 60m <sup>2</sup> and a maximum rate of one space per 25m <sup>2</sup> is applicable.
		3	<b>Service Station:</b> - The rate of 0.75 spaces per fuel bowser should be increased to two spaces per fuel bowser, as one bowser accommodates two cars. The Guidance should also clarify if stacking is included in the rate, with additional details being provided on supplementary land uses.	<b>No change.</b> The rates apply to the car parking spaces which are lined marked, this does not relate to the area required to use the fuel bowser. Supplementary land uses are to be calculated based on land uses being proposed.
		4	<b>Veterinary Centre:</b> - Consider reducing the maximum parking rate from 6 spaces per practitioner, to a maximum of 4 spaces per practitioner to align with the medical centre and consulting rooms land uses.	<b>Draft modified.</b> The Guidance has been updated as follows: - Appendix A of the Guidance has been updated to reflect a maximum rate of four spaces per practitioner. - Appendix B requires a minimum rate of three spaces per practitioner and a maximum rate of six spaces per practitioner.
	Minimum of zero	2	- The ability to apply a minimum of car parking requirement of zero should not be limited to circumstances where it is 'already established' within the planning framework.	<b>Draft modified.</b>



Relevant Section of the Guidance	Theme	Submissions		DPLH Response (Draft Modified   No Change   Monitor Implementation   Future Consideration)
		Number Received	Summary	
			<ul style="list-style-type: none"> <li>- It is recommended that the rate of one car parking space per 100m<sup>2</sup> only applies to development with a floor area greater than 100m<sup>2</sup>.</li> </ul>	The rate applicable to a district centre or higher under Section 3.1 has been updated to provide for a minimum of zero.
	Service Commercial zone	6	<ul style="list-style-type: none"> <li>- Clarification is needed on why the rates apply to the Service Commercial zone, rather than to the Commercial and Mixed Use zones.</li> <li>- Rates have been proposed for a number of land uses which are inconsistent with the zone objectives under the Model Provisions of the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>.</li> <li>- It is queried whether it is appropriate for standardised car parking rates to apply to the Service Commercial zone which does not typically accommodate many small businesses in comparison to activity centres/precincts.</li> <li>- The ability to modify car parking requirements should not be curtailed by the limited range of land uses in Appendix D.</li> </ul>	<p><b>Draft modified.</b></p> <p>The Commercial and Mixed Use zones align with the precincts/activity centres hierarchy, with the applicable rates being provided under Section 3.1. Additionally, the Guidance has been updated to remove the rates for any land uses which do not align with the respective zone objectives.</p>
	Use of flat car parking rates	9	<ul style="list-style-type: none"> <li>- The Precinct Design Guidelines indicate that car parking should be determined in consideration of the mode share target, and modal hierarchy to support the function of the precinct. This means that the application of a flat car parking rate is not appropriate as it should be based on specific locational factors.</li> <li>- The rate is reflective of the park once and walk approach which is appropriate in areas which are well serviced by public transport and provide for other alternative modes of transport.</li> </ul>	<p><b>No change.</b></p> <p>The rates are based on accessibility, employment type and spacing of uses; and as such a separate approach applies to activity centres and precincts, at a district centre level or higher. Variations may be considered where a car parking management plan provides justification based on the projected parking demand for the locality.</p>
	Grouping of land uses	3	<ul style="list-style-type: none"> <li>- Consideration should be given to zone-based rates which are grouped as follows: <ul style="list-style-type: none"> <li>- Neighbourhood Centre and Local Centre zones (combined);</li> <li>- Mixed Use and Commercial zones (combined);</li> <li>- Service Commercial zone; and</li> <li>- Industrial zones (combined).</li> </ul> </li> <li>- The rates are too simplified to properly cater for the needs of different land uses. It is recommended that land uses are grouped together to allocate uniform car parking rates.</li> </ul>	<p><b>No change.</b></p> <p>The zones are not consistent across all local government areas. The rates have been grouped to align with SPP4.2 and SPP7.2 which provides clear parameters around activity centres and precincts and outlines the respective hierarchies.</p>
Implementation	Local planning strategy	5	<ul style="list-style-type: none"> <li>- Clarify that local governments which are not in the process of preparing a new local planning strategy can still adopt the rates via a local planning policy.</li> <li>- The Guidance indicates that a local planning strategy should identify the preparation of non-residential car parking assessments/management plans, however, the timing for the preparation of these documents is unclear. It seems inappropriate for the Guidance to provide guidance on the content of a local planning strategy.</li> </ul>	<p><b>Draft modified.</b></p> <p>Section 4 of the Guidance has been updated to outline how to implement the rates under a local planning framework, including via a local planning policy.</p>
	Calculation of requirements for development assessment	3	<ul style="list-style-type: none"> <li>- Details should be provided which outline how to assess the minimum and maximum rates for a development as part of the development application process.</li> <li>- Clarification is needed on how to assess the minimum and maximum rate for a development, or if an in-between rate is applicable.</li> </ul>	<p><b>Draft modified.</b></p> <p>Section 4 of the Guidance has been updated to clarify how to calculate the minimum and maximum parking required for a development.</p>
	Outer metropolitan activity centres/precincts	16	<ul style="list-style-type: none"> <li>- Consideration should be given to local government areas which sit outside the standard public transport network. There is a strategic difference for these activity centres/precincts due to the lack of public transport available which results in a car dependent community. Once these centres are established and the necessary public transport arrangements are in place, the rates should work but in the interim they will result in significant car parking shortages. Consideration should be given to how these areas transition once the infrastructure is available.</li> </ul>	<p><b>Draft modified.</b></p> <p>Section 4 of the Guidance has been updated to clarify that there is flexibility for area specific rates to be developed and implemented, which are based on projected parking demand in the locality and supported by a car parking management plan.</p>
	Clarity on how to implement	19	<ul style="list-style-type: none"> <li>- Clarification is needed on how the rates would be applied under the local planning framework, as this is not a statutory document.</li> <li>- It is unclear if the rates apply to other zones within a precinct, such as the mixed use and residential zones.</li> <li>- It is anticipated that local government areas will apply the car parking rates in an inconsistent manner, as it relies on local governments to update their local planning framework to be implemented.</li> </ul>	<p><b>Draft modified.</b></p> <p>Section 4 of the Guidance has been updated to provide further clarity on how to implement the rates under a local planning framework.</p>
	Rates adopted under a local planning scheme	3	<ul style="list-style-type: none"> <li>- Non-residential car parking rates are contained within local planning schemes and the Guidance suggests implementation via a local planning policy. A local planning policy cannot take precedence over a scheme provision.</li> </ul>	<p><b>Draft modified.</b></p> <p>Section 4.1 of the Guidance has been updated to provide further clarity on how to assess car parking rates where they remain in a local planning scheme.</p>
	Consideration of reciprocal car parking	1	<ul style="list-style-type: none"> <li>- Some local planning schemes contain provisions for reciprocal parking arrangements; however, it does not appear as though reciprocal parking has been taken into consideration in the Guidance.</li> </ul>	<p><b>No change.</b></p> <p>The rates proposed under the appendices vary based on the location, concentration of land uses; access to, and availability of alternative modes of transport; and the opportunity for reciprocal parking arrangements.</p>
	Local planning policy	14	<ul style="list-style-type: none"> <li>- Concerns on the effectiveness of a local planning policy for parking requirements as they are only an instrument of due regard, instead of having the force and effect of a local planning scheme.</li> <li>- The implementation of car parking provisions through a local planning policy is supported.</li> </ul>	<p><b>Draft modified.</b></p> <p>Implementation via a local planning policy provides flexibility for regular review to ensure rates remain contemporary and fit for purpose, however, there may be some circumstances where it is more appropriate for parking rates to be included in the local planning scheme and these should be considered on a case-by-case basis.</p>



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		Number Received	Summary	
	Structure plans and activity centre plans	6	<ul style="list-style-type: none"> <li>- Implementation through the structure plan/activity centre review process is supported. Clarification is required on whether it is appropriate to update older standard structure plans for centre and greenfield areas, where they contain development requirements with specified car parking rates.</li> <li>- Clarification should be provided in relation to the expectations for amending standard structure plans to include maximum car parking rates. Typically structure plans are prepared to guide the subdivision and development of residential, commercial, or industrial areas, and are not used to prescribe specific development standards.</li> </ul>	<b>Draft modified.</b> Section 4 of the Guidance has been updated to outline how to implement the rates under a local planning framework, including structure plans.
	Introduction of rates in Deemed Provisions	2	<ul style="list-style-type: none"> <li>- Clarify whether the car parking rates are intended to be included under the Deemed Provisions of the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>.</li> </ul>	<b>Draft modified.</b> The recommended non-residential car parking rates form guidance that is intended to support any immediate review of existing rates under the local planning framework on zoned land in Perth and Peel. A new section on data collection has also been added to support the testing and review of the rates, which will be used to determine a longer-term approach, in collaboration with WALGA and the Department of Transport
	Retrospective application	3	<ul style="list-style-type: none"> <li>- Clarify whether the rates be applied retrospectively, as there are a number of existing non-residential land uses provided with inadequate parking.</li> <li>- It is recommended that a further explanation is provided on what is meant by proposed rates and approaches are not to be applied retrospectively.</li> </ul>	<b>No change.</b> The guidance is intended to support the review of existing non-residential car parking rates under the local planning framework. Where a review is undertaken it is recommended that the existing rates are replaced with the rates under the Guidance.
	Unlikely to be enforced	1	<ul style="list-style-type: none"> <li>- It is unlikely that local governments will enforce the rates under the Guidance as many do not enforce their current requirements.</li> </ul>	<b>No change.</b> The Guidance is intended to support the review of existing non-residential car parking rates under the local planning framework on zoned land in the Perth and Peel regions.
	The rates are too high	15	<ul style="list-style-type: none"> <li>- The rates will result in an excess amount of car parking being provided.</li> <li>- It is recommended that a minimum car parking requirement of zero is permitted in the lower order precincts/activity centres, and service commercial and industrial zones. Alternatively, consideration should be given to using a lower flat rate, such as one space per 200m<sup>2</sup> floor area.</li> </ul>	<b>Draft modified.</b> The rates have been determined to address the inappropriate provision of parking and inefficient use of the land. A new section on data collection has also been added to support the testing and review of the rates, which will be used to determine a longer-term approach, in collaboration with WALGA and the Department of Transport. Additionally, Section 4 of the Guidance has been updated to clarify that there is flexibility for area specific rates to be developed and implemented, which are based on the locality and anticipated demand.
	The rates are too low	22	<ul style="list-style-type: none"> <li>- The rates are lower than currently required under a local planning scheme.</li> <li>- The minimum rates should be increased, and a lower car parking requirement can be considered when an applicant has demonstrated that there is a valid reason to depart from the minimum requirement, such as areas which are not within proximity to high frequency public transport. This would also allow for the payment in lieu of parking for the shortfall.</li> <li>- The minimum rates should be increased as areas outside of activity centres/precincts are not typically located within close proximity to high frequency public transport, which results in cars being the predominant mode of transport.</li> </ul>	<b>No change.</b> The parking rates across 14 local government areas in Perth and Peel were examined, which revealed that there is no clear method of standardisation. The rates have been determined to address the inappropriate provision of parking and inefficient use of the land.
	Availability of data	1	<ul style="list-style-type: none"> <li>- Local governments may not have access to, or be able to collect, data for all the land uses which may be able to occur within the locality.</li> </ul>	<b>Draft modified.</b> There is the ability for car parking rates are to be determined through the development assessment process based on the scale of the development and/or the anticipated car parking demand to accommodate the specific business operations. Additionally, a new section on data collection has also been added to support the testing and review of the rates, which will be used to determine a longer-term approach, in collaboration with WALGA and the Department of Transport.
	Lack of evidence to support the rates	35	<ul style="list-style-type: none"> <li>- The rationale behind the rates is not clear, whereby the rate appears to be an arbitrary figure which does not consider the car parking generated from specific land uses nor is it backed by empirical evidence.</li> </ul>	<b>Draft modified.</b> The parking rates across 14 local government areas in Perth and Peel were examined, which revealed that there is no clear method of standardisation. The rates have been determined to address the inappropriate provision of parking and inefficient use of the land. A new section on data collection has also been added to support the testing and review of the rates, which will be used to determine a longer-term approach, in collaboration with WALGA and the Department of Transport. Additionally, Section 4 of the Guidance has also been updated to clarify that there is flexibility for area specific rates to be developed and implemented, which are based on the locality and anticipated demand.
	Monitor and review	3	<ul style="list-style-type: none"> <li>- The interim period will provide for the rates to be tested in the short term, which can be used to determine its effectiveness prior to preparing more formal guidance in the medium term.</li> </ul>	<b>Draft modified.</b>





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		Number Received	Summary	
			- It is recommended that the effectiveness of this approach is continuously assessed as it is adopted and implemented, prior to adopting or regulating any medium to long term approaches.	A new section on data collection has also been added to support the testing and review of the rates, which will be used to determine a longer-term approach, in collaboration with WALGA and the Department of Transport.
	Removal of maximum requirements	9	- Consider if there is a need to impose a maximum rate. - Some areas are not well serviced by public transport, and they do not have high quality pedestrian and/or cyclist environments. It is not considered necessary for the planning framework to restrict the maximum amount of parking that can be provided on a site, as a proponent should be permitted to provide additional car parking to accommodate the needs of their current and future employees.	<b>No change.</b> A maximum parking rate is required to assist in achieving a consistent approach to car parking, whereby a maximum is required to be established to avoid inappropriate provision and inefficient use of the land.
	Removal of minimum requirements	14	- Consider if there is a need to impose a minimum rate. - The removal of car parking minimums is the best policy solution to achieve a state-wide consistent approach for the provision of car parking. It is recommended that car parking minimums are removed from precincts/activity centres at a district centre level or higher. - The State government should show greater leadership by setting a directive to abolish car parking minimums from local planning frameworks within a set period (i.e., within 3 years). - The complexity of the Guidance could be reduced by removing minimum parking rates. Maintaining minimum parking requirements undermines the strategic outcomes found in local planning frameworks relating to development in strategic locations, encouraging changes in mode shift and protecting the natural environment.	<b>Draft modified.</b> The rate applicable under Section 3.1 has been updated to provide for a minimum of zero in district, secondary and strategic centres. However, a minimum rate is required to be adopted for the payment in lieu of parking to be able to apply. A new section on data collection has also been added to support the testing and review of the rates, which will be used to determine a longer-term approach, in collaboration with WALGA and the Department of Transport.
Out of scope	Additional forms of parking	13	- The Guidance should require rates for electric vehicles, car stackers, tandem bays, motorcycles, and electric scooters. Consideration should also be given to including a rate for the number of universal parking spaces required in a development. - Consideration including a rate for the provision of heavy vehicles.	<b>No change.</b> This is not within the scope of this project. Additionally, the Building Code of Australia provides a rate for the provision of universal parking.
	Bicycle parking and end of trip facilities	3	- Rates should be provided for bicycle parking and end-of-trip facilities, along with concessions for the provision of alternative transport modes.	<b>No change.</b> This is not within the scope of this project.
	Coastal areas	4	- Access to coastal areas via public transport or alternative modes of transport is limited, whereby parking requirements need to consider access to the coast.	<b>No change.</b> Noted.
	Impact on residential areas	6	- The rates do not consider the impact on surrounding residential streets adjacent to precincts/activity centres. - Insufficient car parking results in cars parking on the road as well as on footpaths, verges and in front of driveways.	<b>No change.</b> This is not within the scope of this project.
	Inappropriate use of parking	2	- Car parking in precincts/activity centres with access to public transport is frequently occupied by Transperth commuters using the car parking spaces as a 'park and ride'.	<b>No change.</b> This is not within the scope of this project.
	Change of use	2	- There are concerns regarding the change of use between permitted land uses. There should be a minimum parking requirement to trigger a works component under the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i> , which results in a development application being required.	<b>No change.</b> This is not within the scope of this project.
	Loading bays	1	- Minimum rates should be provided for loading bays.	<b>No change.</b> This is not within the scope of this project.
	On-street/off-street parking	2	- It is recommended that the Guidance includes a section that contextualises the role of off-street parking for non-residential land uses. - It is recommended that principles are developed to guide on-street/off-street parking, including clarification of the circumstances where the abutting on-street parking is considered as part of a development assessment.	<b>No change.</b> This is not within the scope of this project.
	Overflow parking	1	- Guiding principles should be provided in relation to overflow parking.	<b>No change.</b> This is not within the scope of this project.
	Parking discounts	2	- It is recommended that guidance is provided on parking discounts.	<b>No change.</b> This is not within the scope of this project.
	Perth Parking Policy	1	- The City of Perth's local planning strategy identifies a need to review the State Government's Perth Parking Policy. Historically, reviews have involved the Department of Transport when developing improvements, however, the City of Perth would welcome the opportunity to involve the State Government and industry to improve the policy as it has the potential to impact the redevelopment of existing commercial buildings.	<b>No change.</b> Noted.
	Residential zone	1	- It is recommended that the Guidance is expanded to include car parking rates for non-residential land uses in residential areas.	<b>No change.</b> This is not within the scope of this project.
	Rural areas	1	- The Guidance should consider including car parking rates for development in rural areas.	<b>No change.</b> This is not within the scope of this project.
	Station parking	3	- It is recommended that the Guidance include rates for train stations, given train stations provide for commuter car parking.	<b>No change.</b> This is not within the scope of this project.