City of Darebin

Guidelines for the Application and Implementation of Travel Plans for New Development in Darebin

Report

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Executive Summary

The City of Darebin commissioned PBAI Australia to develop guidelines to assist in the application of a policy that requires certain developers to submit a Travel Plan (TP) with their development proposal documentation at the planning permit application stage and to then adopt and implement that travel plan. Guidelines are required to assist applicants and Council officers in both the submission and evaluation of TPs procured through the planning process and to define development criteria relevant to the application of the policy.

Travel plans support City of Darebin and State Government policy as embodied in the Municipal Strategic Statement and Melbourne 2030, to reduce car use and increase the take up of alternatives including public transport, walking and cycling. A reduction in car use has positive community and environmental benefits including reduced air pollution, congestion and traffic accidents while the take up of alternatives can improve health and community well being.

The report recognises that the application of the TP requirement on a new development needs to be defined, particularly noting the need to:

- Be compliant with Victorian planning legislation, the Darebin Planning Scheme and relevant enforcement options;
- Clearly define responsibilities and requirements for City of Darebin staff;
- Define the size and type of developments required to include and subsequently adopt a TP;
- Define the acceptable form of the TP;
- Describe the implementation of the TP and mode share outcomes for subsequent development occupants; and,
- Define monitoring and evaluation of the TP to ensure implementation.

In considering the application of the TP requirement, the study has drawn on UK experience including policy and legislation which requires new developments to implement travel plans as part of the planning process. In Australia, while there are examples of travel plans being required as part of a planning or development consent, as yet there is no consistent application of a travel plan requirement.

The report proposes that City of Darebin utilise the existing planning permit application process to require developers to develop and implement TPs. In developing the criteria and process a number of considerations have been identified:

- No necessary change to the Darebin Planning Scheme, that is, the requirement is encompassed within the existing scheme;
- No increase in the Statutory Planning workload;
- The process is simple to understand by both Council staff and applicants; and,
- Clear criteria that can be applied objectively are developed.

Four types of development are identified that would benefit from a travel plan:

- Workplaces;
- Large retail premises;
- Large residential blocks (multi-unit developments); and,
- High trip generating developments, such as schools, colleges and hospitals.

The process for a TP to be submitted and to then form part of a permit consent should be:

- Stage 1 – Outline TP submitted with permit application by **applicant**. The outline TP must be approved prior to permit approval and will form part of the permit consent. Applicant required to give notice of occupation of development 7 days before occupation commences.
- Stage 2 – Prior to occupation, **occupier** to submit TP for approval prior to occupation.
- Stage 3 – Monitoring report to be submitted to Council by **occupier** 12 months after occupation commenced.

It will be necessary to evaluate the TP at several stages through the process, including:

- When submitted in outline form to accompany the planning permit application;
- Following any amendments to the outline TP and/or planning permit application;
- The detailed TP following granting of the planning permit subject to the TP condition; and,
- Following implementation of the TP on a regular (probably annual) basis.

Enforcement only becomes an issue after the planning permit has been granted. The enforcement of the TP condition will be similar to the enforcement of any other condition attached to a planning permit. Should the applicant, landowner or occupant fail to comply measures can be taken to ensure compliance.

The report recommendations are summarised below:

- Council should pursue an amendment to Clause 22 (Local Policy Framework) to support the TP requirement.
- Travel Plan requirements and the operation of the planning scheme will be examined in the next review of the Darebin planning scheme.
- Council should, in the medium to long term, consider the use of zones where all multi-unit residential, office and industrial development requires a planning permit.
- Council should require all planning permit applications meeting one (or more) of the following criteria to submit an outline travel plan with their planning permit application and enter the travel plan process:
    - Units – 20 units and above
    - Offices (or an office component of a mixed use development) – 500sqm and above
    - Industrial – 1,000sqm and above
    - Retail (single retail unit or multiple units within a shopping centre) – 1,000sqm and above
- Council should monitor the number of planning permit applications meeting the above criteria closely.
- Council should review this document annually to assess its value to Council's planning staff, planning permit applicants and subsequent building occupiers in achieving Council's objectives and providing sufficient advice and guidance. Reviews should include discussions with Council staff, planning permit applicants and occupiers.

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1.0 Introduction

The City of Darebin commissioned PBAI Australia to develop guidelines to assist in the application of a policy that requires certain developers to submit a Travel Plan (TP) with their development proposal documentation at the planning permit application stage and to then adopt and implement that travel plan. Guidelines are required to assist applicants and Council officers in both the submission and evaluation of TPs procured through the planning process and to define development criteria relevant to the application of the policy.

TPs seek to bring about a mode shift away from single occupancy car use for the journey to and from work, increasing the use of more sustainable alternatives such as public transport, walking and cycling and also car sharing. Travel plans offer the opportunity to encourage people to think more about how they travel, not only to and from work and during the working day but also for non work related trips in the evenings and at weekends. In this way travel plans can impact on peak hour travel when road congestion is often at its worst and also bring about change at other times.

Increasing the use of public transport, walking and cycling has positive individual benefits through increasing the amount of exercise incorporated into the working day. Even a short walk to and from the bus stop is better than using a car where parking is provided close to the workplace. For many people incorporating daily exercise into the journey to and from work makes a big difference to their health and wellbeing with positive impacts for their employer through reduced sick days. Travel plans can incorporate events and build a greater sense of community within the workplace, again having a positive impact on morale. In reducing traffic, particularly on local streets, TPs have clearly positive environmental and road safety impacts. The adoption of a TP by a workplace demonstrates a desire to be a good neighbour and reduce any negative impacts of the business on the immediate community.

Recognising these positive benefits, City of Darebin has chosen to encourage a broader development and take up of TPs through the planning process. This report provides the background to the development of the guidelines and proposes guidelines for the application of the requirement for a TP.

The application of the TP requirement on a new development needs to be defined, particularly:

- To be compliant with Victorian planning legislation, the Darebin Planning Scheme and relevant enforcement options;
- Clearly defined responsibilities and requirements for City of Darebin staff;
- The size and type of developments required to include and subsequently adopt a TP;
- The acceptable form of the TP;
- The implementation of the TP and mode share outcomes for subsequent development occupants; and,
- Monitoring and evaluation of the TP to ensure implementation.

An outline of a TP, intended to assist both applicants and City of Darebin staff understand the requirement and process is included in **Appendix A**.

A list of useful information resources is contained in **Appendix B**.

Examples of planning documentation requiring TPs is contained in **Appendices C** and **D**.

Evaluation pro formas and a suggested monitoring report structure are contained in **Appendices E** and **F** respectively.

2.0 Context

While high levels of redevelopment are not expected in Darebin, both medium to high density residential and commercial development is occurring in line with the Darebin Planning Scheme and structure planning process. Medium density residential development is occurring along the High Street corridor, associated with good rail and tram accessibility. The Preston Structure Plan and the Northcote Structure Plan (in progress) are also likely to influence revised development levels.

Commercial development is also occurring. Darebin has seen new office development in commercial centres and industrial land in the municipality remains popular with developers.

It is likely that development will continue at a steady pace with possible increases in the rate of development in Preston and Northcote as a result of structure planning processes.

2.1 Workplace / Green Travel Plans

Workplace travel plans or green travel plans are a widely accepted travel demand management tool with a focus on the journey to and from work and reducing peak hour road use. TPs have been widely implemented in Europe and North America and there has been considerable research into the impacts of these initiatives. Recent Department for Transport (UK) funded research reviews workplace travel plans and the available literature[1] and provides an excellent reference on TPs.

Overall, workplace travel plans are found to be successful in reducing car use for the journey to work although systematic evaluation of travel plans tends to be lacking. Analysis tends to focus on single occupancy vehicle trips and a take up of more sustainable alternatives, including car sharing. The UK research reported in *Smarter Choices* (ibid) tends to support a drop of 10%+ in single occupancy car trips with a corresponding increase in alternatives.

Within Australia workplace travel plans are not yet so prevalent, however, there are notable success stories including the City of Darebin's own green travel plan. The Victorian Department of Infrastructure runs a successful workplace program within the TravelSmart area of work and provides support to companies developing travel plans.

Travel plans can also be applied to residential developments, particularly medium and high density unit developments. While there are few examples in Australia examples do exist overseas. Developers are also recognising a market demand for reduced parking (and therefore apartment cost) and parking provision constraints on development size often brought about through the redevelopment of sites in high density areas.

2.2 Securing Travel Plans through the Planning Process

In the UK new developments fulfilling specified criteria are required to write and implement a travel plan as part of the planning approval process. There has been some research into the effectiveness of this process in securing travel plans. In particular the DfT published a best practice guide in 2002[2]. This provides useful guidance and recommendations, including the following considerations:

- *Travel plans need to be dynamic and flexible over time, even though the planning system secures them largely at one point in time;*

[1] Cairns, S. Sloman, L. Newson, C. Kirkbride, A. and Goodwin, P. *Smarter Choices – Changing the Way We Travel (The influence of soft factor interventions on travel demand).* DfT June 2004

[2] DfT *Using the planning process to secure travel plans – Best practice guidance for local authorities, developers and occupiers.* July 2002

- *Preparation of travel plans as currently perceived requires information about an occupier's employee travel patterns, which in speculative or phased developments may not be known at the time the planning application is determined – so a phased approach is needed;*
- *Some measures of travel plans depend on critical mass to be realistically achieved, so means need to be devised to secure travel plans in all potentially related developments; and,*
- *The availability of resources or skills, that may not be present in local authority development control team, to pursue effective plans and the potential conflict with the requirement for speed of determination on applications.*

Other advice includes:

An effective process for both the local authority and the developer necessitates publicly available information on requirements and clear formal internal procedures. Close multi-disciplinary working is essential as is good baseline information. Wherever possible support should be actively provided to applicants.

The guidance promotes the need for applicants to understand the travel plan process and the benefits of a TP to their development and for this appreciation to be passed on to the subsequent occupier, if not the developer or applicant. The travel plan should be clearly of the same order as highway improvement necessitated through the development some of which may be negated through the development and adoption of a TP.

This guidance also highlights a number of issues, including:

- Implementing the requirement in the case of speculative development,
- Monitoring and evaluation of a TP over time, and
- A staged approach is often necessary.

In NSW the Department of Infrastructure, Planning and Natural Resources (DIPNR) has recently required developments of State Significance (and therefore determined by the Minister) to be accompanied by a TP. One such example is the recent application made by Optus to develop a campus style office development in Macquarie Park, North Ryde. The North Ryde premises will be a flagship head office with over 7,000 staff on site. The DIPNR report, granting the Optus development application is included in **Appendix C**.

The approach adopted by DIPNR is supported through local planning documentation, notably the City of Ryde Draft Local Environmental Plan (LEP) for the Macquarie Park Corridor which in turn is based on a series of studies funded by local and state government. The LEP strongly encourages increased use of public and transport, walking and cycling and proposes parking controls to support these aims. The draft LEP is contained in **Appendix D**.

A Transport Management and Accessibility Plan (TMAP) for the Macquarie Park corridor recommended that both new and existing developments within the area be required to develop travel plans to support a reduced reliance on the private car, however, with the exception of large development applications that have gone to the Minister for approval there is no wider requirement for TPs.

2.3 Melbourne 2030

Melbourne 2030 supports the implementation of TPs and the inclusion of TPs within the planning process for new and extended developments.

Relevant policies include:

Policy 8.3 *– Plan urban development to make jobs and community services more accessible.*

In particular, initiative 8.3.1 states:

Require that integrated transport plans (ITPs) be prepared for all new major residential, commercial and industrial developments and develop guidelines for developers and councils that emphasise sustainable transport outcomes, including provision for –

- *Setting mode split targets*
- *Managing access and egress*
- *Defining parking requirements*
- *Supporting public transport use*
- *Encouraging access by cyclists and pedestrians*

***Policy 8.8** – Promote the use of sustainable personal transport options.*

Initiative 8.8.4 states:

Develop and implement 'green travel plans' for Department of Infrastructure offices and promote these to other government departments and agencies and other workplaces.

A travel plan is one of many outcomes that can result from the development of an ITP as required under Melbourne 2030, however, it should also be noted that TPs are worthwhile for relatively small developments and can mitigate potentially undesirable negative traffic impacts. In this way a TP can be used by a development applicant or Council to secure development that may otherwise be unacceptable within the local area.

2.4 Other State Policies and Plans

2.4.1 Linking Victoria

Linking Victoria set a target for public transport use within Metropolitan Melbourne of 20% by the year 2020. This is regularly referred to as 20:2020. The adoption of TPs clearly supports this target.

2.4.2 Metropolitan Transport Plan

The Metropolitan Transport Plan (2004) recognises the problem of increasing levels of road congestion. 'Workplace Access Plans' are recognised within Strategy 2.4 – promote sustainable travel through better demand management'. It should also be recognised that TPs (or Workplace Access Plans' can contribute to the realisation of other strategies within the Plan, including:

- Strategy 2.2 – Make existing roads operate better (improve vehicle occupancy).
- Strategy 2.3 – Improve service coordination, integration and customer interface (better coordination and information).

2.5 State Planning Policy Framework

The role and objectives of the State Planning Policy Framework (SPPF) are set out in State Planning Policy Framework Clause 11 (DSE). This states:

The SPPF provides a context for spatial planning and decision making by planning…authorities. It is comprised of a statement of general principles for land use and development planning and specific policies dealing with sectoral issues.

The SPPF seeks to ensure that the objectives of planning in Victoria are fostered through appropriate land use and development planning policies and practices which integrate relevant environmental, social and economic factors in the interests of net community benefit and sustainable development.

The SPPF sets the context for the Local Planning Policy Framework which determines the strategic local and regional planning context for each municipality.

2.6 Local Planning Policy Framework

The Municipal Strategic Statement (MSS) sets the future direction for the way that the municipality will physically develop. In doing so it provides the strategic justification for the detailed controls contained within the planning scheme. The MSS also sets the framework for Council's ongoing town planning and policy development activities.

An amendment to the MSS is being seriously entertained and is currently with the Minister for approval (July 2005). Clause 21.05-9 of the amendment refers to Transport and Access. This clause seeks to achieve the vision:

An integrated transport system which contributes to sustainability and addresses current and future local and regional transport needs, for both public and private transport.

The following relevant strategies are identified:

- *Continue to support and implement State Government TravelSmart programs to facilitate further use of sustainable transport options.*
- *Require a Green Travel Plan to be prepared prior to considering any dispensations to car parking by major new development.*
- *Prepare a Green Travel Plan policy.*

2.7 Planning and Environment Act 1987

The Planning and Environment Act 1987 (with subsequent amendments) sets out planning law as applicable within Victoria. Any requirements for a TP to accompany planning permit applications must comply with the Act and be capable of enforcement through the relevant provisions of the Act.

The Act sets out legislation relating to development permissions and consents within Victoria, including the application of conditions and the enforcement of those conditions.

The Act makes clear that a condition for a TP could be applied to planning permit applications within Section 62:

"*A condition that plans, drawings or other documents be prepared by the applicant and lodged with the responsible authority for approval before use of development or a specified part starts*" s62(2)(i)

Enforcement of conditions is covered by the Act and there is a clear provision for enforcement to occur against the occupier or owner of a site. This is particularly relevant as a TP would necessarily be prepared, at least in outline, by the applicant and then implemented by the occupier. Either or both of these parties may be the owner of the site. Section 114 states:

An enforcement order may be made against one or more of the following persons —

(a) the owner of the land;

(b) the occupier of the land;

(c) any other person who has an interest in the land;

(d) any other person by whom or on whose behalf the use or development was, is being, or is to be carried out. S114(3)

Enforcement processes are well established and can be applied to a condition such as the requirement for a TP.

Council can enter into agreement with the owner/occupier of a site (s173) and it appears a TP could be required as a Section 173 condition. Section 173 states:

Responsible authority may enter into agreements

(1) A responsible authority may enter into an agreement with an owner of land in the area covered by a planning scheme for which it is a responsible authority.

(2) A responsible authority may enter into the agreement on its own behalf or jointly with any other person or body.

(3) A responsible authority may enter into an agreement under sub-section (1) with a person in anticipation of that person becoming the owner of the land. S173(1)(2)(3)

The Planning Act 1987 is largely enforced by the Planning Division of the Victorian Civil and Administrative Tribunal (VCAT). Applicants, members of the public, the responsible authority (usually the local council) and others can make applications to VCAT to cancel or amend planning permits after they have been issued including where there is a substantial failure to comply with the conditions of the permit. While this offers Council a means to enforce permit conditions, with the potential to cancel a permit if conditions are not met, it should be noted that:

…there is no time limit on the time when a permit can be cancelled or amended if it relates to the use of land. However, if it relates to either the development of land or construction of buildings or works, it can only be cancelled or amended before the development has been substantially completed.[3]

While a TP can be required by Council as a condition of development at the application stage and enforcement options exist as stated within law, it is unlikely a TP will be successful unless the occupant and/or employer has bought into the concept, understands the TP process and is committed to implementation. There is a clear role for Council in assisting developers and occupants understand a TP and the benefits to them and their employees, so developing ownership of the TP within the workplace.

Some developments are required to submit a Traffic Impact Assessment (TIA) with the development application. The TIA generally provides an assessment of the vehicles generated by the site during the morning and evening peak hours. A view is then taken, with the assistance of intersection modelling, as to the subsequent impact on the local area and nearby intersections. A financial contribution may be requested from the developer to assist in mitigating any negative impacts arising from the site traffic generation. In the City of Darebin this is a somewhat subjective process and there are no clear guidelines on the circumstances in which a TIA is requested. Anecdotal evidence suggests that submitted TIAs are of varying quality.

The requirement for a TP should be coordinated with the requirement for a *Transport* Impact Assessment. Council should set out guidelines for the content of a Transport Impact Assessment, ensuring it encompasses all modes.

2.8 Darebin Planning Scheme

The Darebin Planning Scheme is set out in accordance with State legislation. The municipality is divided into a series of defined zones, with each zone having fairly consistent land use characteristics. Within each zone three types of development are defined:

- Permit not required (Section 1) – a planning permit is not required if the developer meets all requirements of the planning scheme, including the provision of parking etc. Council would only decide on applications within this category if conditions were not being met or waivers

[3] DSE (2002)Using Victoria's Planning System

sought by the applicant. Any conditions for the land use must be met otherwise a permit is required.

- Permit required (Section 2) – a planning permit is required to approve the development.
- Prohibited (Section 3) – land uses that are not permitted within the zone.

The zones within the Darebin Planning Scheme relevant to the discussion on TPs are:

- Mixed Use
- Public Use
- Residential 1
- Business 1
- Business 2
- Business 3
- Business 4
- Business 5
- Industrial 1
- Industrial 3
- Public Park and Recreation

Within a Business 2 zone large office developments could occur without the need for a planning permit as the use is considered permitted development. It is suggested that Council consider the use of an alternative zone to ensure large office developments are captured within the planning permit process when the Darebin Planning Scheme is reviewed.

A number of clauses under Particular Provisions form part of the Planning Scheme and all developments (whether a permit is required or not under the zoning system) are required to comply with the provisions. Where a development does not require a permit under the zone system but does not meet the requirements of the relevant provision, a permit application must be submitted for approval prior to development.

One provision is particularly important to the discussion:

- Clause 52.06 Car Parking – Car parking rates are defined in Victoria based on minimum parking provision. Where a development cannot or does not want to provide the required level of parking a permit application must be submitted to waive all or part of the car parking requirement. There is no similar requirement for a permit application if the development provides more parking than identified in the provision. It is likely that Victoria will, in time, move towards maximum parking provision, essentially reversing the current situation and requiring a permit application for only those developments exceeding the parking required under the clause.

Local policy framework is defined in Clause 22 which generally expands on state requirements and is specific to the local area. Clause 22 offers each municipality an opportunity to identify particular areas, characteristics and priorities of importance to the local area. Clause 22 offers an opportunity to Council to formalise the role of travel demand management and green travel plans within the constructs of the Planning Scheme. It is recommended that a Clause 22 amendment is pursued to support the need for larger developments to adopt a TP through the planning process. This will give the requirement weight, particularly if challenged through VCAT.

3.0 Application

It is proposed that City of Darebin utilise the existing planning permit application process to require developers to develop and implement TPs. In developing the criteria and process a number of considerations have been identified:

- No necessary change to the Darebin Planning Scheme, that is, the requirement is encompassed within the existing scheme;
- No increase in the Statutory Planning workload;
- The process is simple to understand by both Council staff and applicants; and,
- Clear criteria that can be applied objectively are developed.

3.1 Discussion

This section reviews relevant legislative examples and policy. Given that travel plans are not consistently required to accompany planning permit applications elsewhere in Australia, the study has drawn on UK experience and the planning requirements on development. In particular it is useful to consider the practical application of the UK legislation.

In the UK, planning legislation requires workplaces of a certain size and significance to include a TP with a planning application. The requirement for a TP relates to the entire site or development and not just the part of it covered within the planning application.

Planning Policy Guidance note 13 (PPG 13) states:

87. The Government wants to help raise awareness of the impacts of travel decisions and promote the widespread use of travel plans amongst businesses, schools, hospitals and other organisations. Local authorities are expected to consider setting local targets for the adoption of travel plans by local businesses and other organisations and to set an example by adopting their own plans.

88. …their [travel plans] relevance to planning lies in the delivery of sustainable transport objectives, including:

- *reductions in car usage (particularly single occupancy journeys) and increased use of public transport, walking and cycling;*
- *reduced traffic speeds and improved road safety and personal security particularly for pedestrians and cyclists; and*
- *more environmentally friendly delivery and freight movements, including home delivery services.*

89. The Government considers that travel plans should be submitted alongside planning applications which are likely to have significant transport implications, including those for:

- *all major developments comprising jobs, shopping, leisure and services (using the same thresholds as set out in annex D);*
- *smaller developments comprising jobs, shopping, leisure and services which would generate significant amounts of travel…. This particularly applies to offices, industry, health and education uses;*
- *new and expanded school facilities…; and*
- *where a travel plan would help address a particular local traffic problem associated with a planning application, which might otherwise have to be refused on local traffic grounds.*

However, unacceptable development should never be permitted because of the existence of a travel plan.

90. …they [travel plans] should be worked up in consultation with the local authority and local transport providers. They should have measurable outputs, which might relate to targets in the local transport plan, and should set out the arrangements for monitoring the progress of the plan, as well as the arrangements for enforcement, in the event that agreed objectives are not met…

91. The weight to be given to a travel plan in a planning decision will be influenced by the extent to which it materially affects the acceptability of the development proposed and the degree to which it can be lawfully secured. Under certain circumstances some or all of a travel plan may be made binding either through conditions attached to a planning permission or through a related planning obligation.

The thresholds referred to within the above text explicitly refer to nationally adopted parking standards and floor space rather than employee numbers. It should be noted that the expansion of existing premises can trigger a requirement for a TP, based on the total floor space of the whole (that is, existing plus new) premises.

It is possible to equate floor space by building type to the expected number of employees. Some developments will fall outside normal levels, for example a call centre may have higher than expected number of employees while a soft drink bottling plant will have a lower than expected number of employees within the proposed floor space. The City of Darebin can reserve the right to vary the conditions of application to take account of these circumstances.

Given Council's ability to review the planning permit application requirements on a site by site basis and waive the TP condition if appropriate and the need for simplicity to aid understanding in the application of the TP requirement, it is proposed that a general approach be adopted. This suggests that any development application within the Darebin LGA meeting set criteria will be required to submit a TP to support the planning permit application and to subsequently implement that TP, unless the TP requirement is specifically waived by Council.

A TP may benefit a developer in a number of ways, including:

- Where a planning permit may otherwise be refused due to unacceptable traffic impacts on the local area, in the absence of a TP;
- Where planning consent would be subject to a transport infrastructure requirement a TP may act to reduce or negate that requirement; and,
- Where the level of on site parking required by Council cannot be accommodated or is considered too costly to provide, a TP may be used to demonstrate a lower car parking requirement.

Council should be mindful of these situations and the acceptability and likelihood of a TP negating potential negative impacts of development. While a TP can negate negative traffic impacts of development and bring about a real mode shift, this relies on committed funding, implementation and monitoring by the building occupier over a number of years.

3.2 Residential

Residential developments should look to encourage and support sustainable travel by residents, particularly where on-site parking is reduced to encourage the use of alternatives and ensure residents vehicles do not impact on the amenity of local streets. While a green travel plan is, however, considered to be difficult to implement for a multi-unit residential property given strata ownership and the lack of ongoing involvement on behalf of the developer it would be possible if an agreement with the strata company or body corporate is established which requires the strata company to implement the TP.

A number of options can be pursued to encourage sustainable transport uptake by new residents, including:

- Provision of secure cycle storage for each apartment – potentially beyond that advised by state government;
- Access to/from secure cycle parking to meet with guidance (ramp gradients and headroom clearance);
- Information pack with details of local transport options, maps and timetables for new residents;
- Incentives for new residents to encourage the take up of public transport, walking and cycling;
- The provision of one or two car club (car share) parking spaces on site and the establishment of a link to a car share company; and,
- Site design to maximise pedestrian accessibility with particular consideration of local desire lines.

Some of these measures can be covered in the planning permit process, however, a simple TP implemented by the strata company or body corporate could also be effective in promoting ongoing travel behaviour change. With residential development, like commercial development, it is suggested that only larger complexes would be suitable for TP application and at this stage a notional 20 units or more may be considered a suitable size to work with and encourage a travel behaviour shift amongst residents.

3.3 Workplaces (Commercial / Industrial)

TPs can be effective in workplaces of all sizes, however, it is important to recognise that the size of the workplace will affect the measures adopted within the travel plan to some extent. For example, a successful car pool or share scheme generally requires several hundred employees within a single workplace or a small number of co-located workplaces to be successful, while personal journey planning demands a level of time and effort per employee that may be difficult to resource within a large company.

The requirement for a TP to accompany a planning permit submission should be based on the likely value to be derived from that travel plan in terms of a traffic reduction and improvements in the amenity of the local area. On this basis it is recommended that the requirement for a TP is defined by staff numbers (impact) and therefore the scale of total development. As employee numbers are taken as a proxy for trips to and from the workplace, full-time and part-time employees should be counted equally.

This process, however, should be simple and recognise the existing planning scheme parameters, hence an approach based on floor space (existing and proposed) to estimate expected employee numbers is suggested. If a floor space ratio of 15sqm to one employee were adopted, 500sqm would equate to about 33 employees.

For industrial premises the employee density is much lower with the floor space per employee being higher. It is suggested that a ratio of one employee per 40sqm gfa may be appropriate and therefore 1,000sqm would equate to about 25 employees.

Where the development is mixed use, for example a warehouse with office component, but neither component alone requires a TP, it would be advisable to consider the combined floor area to give an overall expected number of employees.

3.4 Retail

Retail units are like any other workplace and given the proposed Travel Plan requirement for office and industrial premises, it is reasonable to extend the requirement to retail premises. Given the likely increase in residential and commercial development within Darebin, it is expected that retail

floor space will also increase through the municipality to service those living and working locally. Retail premises have a range of TP options available to them and can be successful in reducing single occupant staff car travel, releasing available parking for customers which supports the retail function.

Anecdotal evidence suggests that large supermarkets and 'majors' such as Target and K-Mart have one employee to 35sqm while general retailers have one employee to 20sqm. This suggests that 1,000sqm gfa would equate to 30 – 50 employees.

Where a number of retail units are clustered together in a shopping centre, the total retail floor space should be considered and a TP prepared for the entire site.

3.5 High Trip Generating Workplaces

Certain land uses (schools, colleges and healthcare facilities) should always be required to produce a TP given their impact on the locality in terms of transport by staff and visitors to the site. These land uses are major trip attractors and can have a considerable impact on the local area, including residential amenity and traffic congestion. In addition these land uses:

- Should be highly accessible to a broad cross section of the community;
- Should actively promote a healthy community;
- Should advocate a high degree of site safety and seek to reduce conflict between road users; and,
- Should support Council and State policy relating to:
    - Air quality improvements
    - Increased uptake of active transport
    - Reduced car use
    - Improved local amenity
    - Positive impact on road safety.

3.6 Criteria

Following the above discussion it is suggested that City of Darebin adopt the following criteria for the application of TPs through the planning permit process:

- Units – 20 units and above
- Offices (or an office component of a mixed use development) – 500sqm and above
- Industrial – 1,000sqm and above
- Retail (single retail unit or multiple units within a shopping centre) – 1,000sqm and above

All permit applications meeting the above criteria must have an accompanying TP at the time of application and follow the process described in the following section.

3.7 Process

The process for a travel plan to be submitted falls into two categories: (1) those travel plans required to make a decision on a permit application and (2) those required as part of the policy framework.

1) If a travel plan is submitted as part of a planning permit application where reduced parking has been requested, for example, then it will be a requirement of the application that a travel

plan is submitted. This is because the travel plan will become part of the decision making process used in the assessment of the permit.

2) In some circumstances a permit may be approved if all other criteria has been satisfied. In these cases a Travel Plan condition will be applied to the permit.

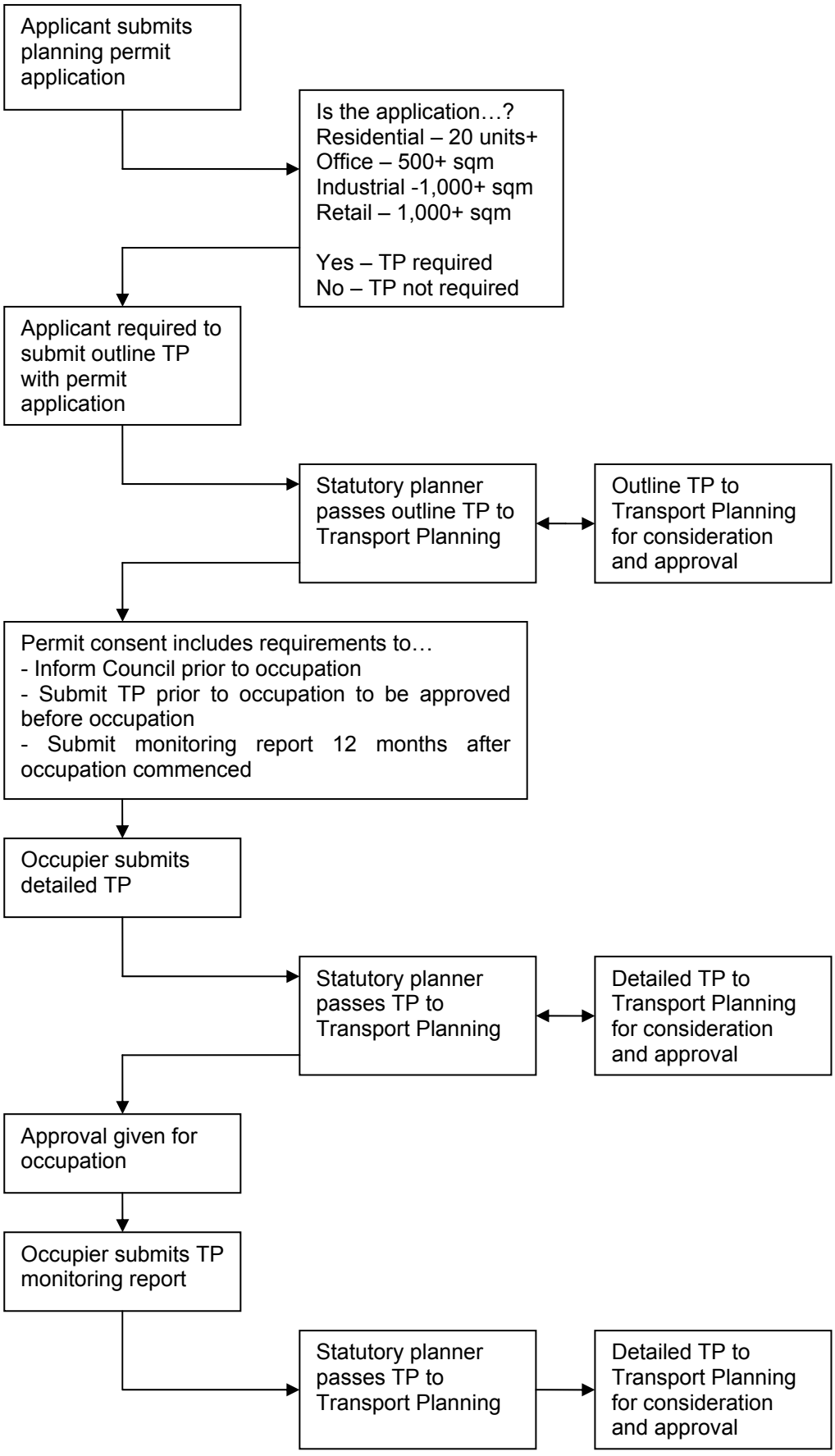
A travel plan is not a tool to correct traffic and transport impacts arising out of development, although it can mitigate them. Moreover, a TP is a mechanism to improve overall accessibility to the site. However, a TP can also assist in the reduction of certain requirements such as parking levels.

The process is detailed in the table below.

Table 3.1 – The Travel Plan Process

Stage	Category 1	Category 2
Stage 1	Outline travel plan submitted with permit application by the **applicant**. The submitted outline will be assessed as part of the permit assessment process. The outline travel plan must therefore be approved prior to permit approval and will form part of the permit consent.	If all other criteria is satisfied and the application is approved, it will be a requirement of the permit (usually in condition 1) that a full travel plan will be submitted for approval prior to development commencing.
Stage 2	Travel Plan to be endorsed pursuant to the Planning permit together with plans and other relevant documents	Prior to endorsement of <u>any</u> plans, **applicant** to submit travel plan (as well as other condition 1 requirements) for approval prior to occupation. Council officers will assess the travel plan and approve or seek changes as necessary.
Stage 3	Monitoring report to be submitted to Council by **occupier** 12 months after occupation commenced.	Monitoring report to be submitted to Council by **occupier** 12 months after occupation commenced.

The process is shown in more detail in the following diagram.


Applicant submits planning permit application
Is the application…?
Residential – 20 units+
Office – 500+ sqm
Industrial -1,000+ sqm
Retail – 1,000+ sqm
Yes – TP required
No – TP not required
Applicant required to submit outline TP with permit application
Statutory planner passes outline TP to Transport Planning
Outline TP to Transport Planning for consideration and approval
Permit consent includes requirements to…
- Inform Council prior to occupation
- Submit TP prior to occupation to be approved before occupation
- Submit monitoring report 12 months after occupation commenced
Occupier submits detailed TP
Statutory planner passes TP to Transport Planning
Detailed TP to Transport Planning for consideration and approval
Approval given for occupation
Occupier submits TP monitoring report
Statutory planner passes TP to Transport Planning
Detailed TP to Transport Planning for consideration and approval

4.0 Travel Plans

Travel plans (TPs) are well established overseas. In the UK business travel plans have been written into planning and development legislation with new developments and extensions to existing developments triggering the need for a travel plan with clear mode share targets. The link between transport (air quality and personal exercise issues) and health care is well established and all hospitals in the UK are required to develop travel plans to reduce the level of car dependency amongst all those accessing the hospital site.

Elsewhere in Europe there are notable success stories, although generally Continental Europe enjoys much lower car use than the UK with greater use of walking, cycling and public transport, particularly within urban areas. Provision for these alternatives to the car is generally good given that use has been sustained despite the increased popularity of the car in post war years.

In North America travel plans have largely been established as a response to commute laws focusing on air quality and local environmental degradation. There are some great examples, although commute trip laws have largely been abandoned in favour of voluntary schemes.

Green travel plans seek to reduce car use for the trip to and from work, bringing about an absolute reduction in car use through mode shift and, where possible, a reduction in the amount of travel undertaken.

4.1 Travel Plan Development

There are key tasks that must be undertaken in developing a TP within any workplace or business and these include:

- Establish Roles and Responsibilities
- Understanding Current Transport and Travel
    - Site assessment / audit
    - Policy audit
    - Staff travel survey
    - Assessment of visitor travel and goods and services
- Setting Objectives, Targets and Indicators
- Identifying Measures
- Implementation
    - Program and resources
    - Maintaining momentum
- Monitoring

Buying in outside help, usually consultants, to put the plan together is an option, particularly if the workplace lacks the available resources, however this should not be seen as a pre-requisite. There are lots of publications setting out how to develop a travel plan with examples and it develops ownership of the plan to involve staff (and in the case of tertiary education facilities, students) in its development. A simple TP outline[4] has been developed and included in **Appendix A**.

An overview of the steps in developing a travel plan is provided below. It is important to consider the size of the workplace when developing or assessing a TP. Smaller workplaces only need a

[4] Based on DOI Better Ways to Work Travel Plan outline

simple TP and some of the actions identified will not be relevant. When developing a workplace TP it is important to tailor the plan to the workplace and achieve the central objective of reducing car use by staff. TP assessment should look for evidence that the TP has taken into account the intended occupier of the site, their business and their staff.

4.1.1 Establish Roles and Responsibilities

It is important to establish who will be responsible for the travel plan, its development and implementation within the workplace at the outset. This will develop internal ownership and coordination. While most travel plans will benefit greatly from having a 'champion' to push the process and the plan implementation, a **steering group** comprising a range of staff, including decision makers is essential.

4.1.2 Understanding Current Transport and Travel

A **transport audit** can be completed to record transport services available, parking access and management, facilities such as cycle parking and showers. The audit will provide an understanding of what transport options are available, where there are gaps and what can be easily improved. Setting out a pro forma for the audit and taking lots of photos to illustrate points will help record the information.

Workplace policies can impact on transport choices and a **policy audit** should be completed early in the process. Policies relating to working hours, parking space allocation and charges, fleet management, recruitment and induction, child care and dress codes will all impact on travel choices. The influence of unions will need to be assessed and the ease with which staff contracts can be reviewed and amended. This is important for issues such as company car allocation.

There are lots of tried and tested ways of collecting the data needed to support a travel plan. **Self completion staff questionnaires** with a **prize draw incentive** to encourage completion and return are popular and work well providing data and the prize draw is a great story to kick off the travel plan.

Quick interview surveys could be completed to record how visitors arrive at the workplace, possibly be reception staff.

4.1.3 Setting Objectives, Targets and Indicators

Every travel plan needs to have defined objectives and targets that can be measured through indicators. This sets out the plan direction and extent and allows for monitoring to be carried out. The overall objectives will generally be set by the steering group and should link with their own aspirations for the plan, recognising the problems the plan should be helping address. Objectives must be SMART – Specific, Measurable, Achievable, Realistic and Time based.

Targets will help define the plan and make sure the objectives are met over time. Travel plan targets often focus on modal shift. Indicators look to measure the extent to which targets have been achieved. Where a certain level of mode shift is a target, indicators will probably include the number of staff arriving by car and the number of cycles parked on site.

4.1.4 Identifying Measures

The work already done in understanding current travel and its context and setting out objectives will do much to identify measures and actions which will form the main part of the travel plan. Staff workshops are a great option at this stage as they use local knowledge to identify what can be done and build staff ownership of the plan itself.

Some general ideas for actions include:

- Priority parking for car sharers

- Introduction of daily parking charges
- Journey planning
- Interest free loans for bicycles and public transport season tickets
- Sale of discounted public transport tickets
- Providing or improving on site showers and change rooms
- Providing or improving cycle parking
- Including transport information on all hospital publications, business cards, appointment letters and leaflets
- Providing comprehensive travel information on the company website
- Providing transport information to new staff through the induction process
- Map showing local cycle routes displayed in a central location
- Buckets for wet umbrellas and hooks for coats
- Green commuter breakfasts
- Car share database or noticeboard

Some things will be more difficult and expensive while others will be easy, cheap and quick – the travel plan will include a mixture. It will be important to identify actions which are unique to the workplace and are not simply taken from the guidance available.

4.1.5 Implementation

The implementation of the travel plan will be set out in a **program** that will identify actions, **resources** and timelines. Working within available resources and with proper consultation, particularly for the bigger actions is important.

Maintaining the **momentum** of the travel plan is important to keep interest up. Easy actions and quick wins early on will help build initial interest and ongoing events (like monthly green commuter breakfasts) and newsletter articles will keep that interest up. The travel plan needs to become part of everyday life within the workplace and a part of all policies and programs.

4.1.6 Monitoring

The travel plan should be monitored to make sure it is actually achieving the objectives and meeting the targets. Annual **monitoring** based on the indicators is usually undertaken but should be focused and low cost. A quick mode share staff survey and a count of cycles parked on site may be all that is required.

For larger TPs stakeholders may be able to assist in monitoring the plan. For example, the local bus company may be able to provide information on the number of passengers that board at local bus stops.

5.0 Evaluation and Enforcement

5.1 Evaluation

It will be necessary to evaluate the TP at several stages through the process, including:

- When submitted in outline form to accompany the planning permit application;
- Following any amendments to the outline TP and/or planning permit application;
- The detailed TP following granting of the planning permit subject to the TP condition; and,
- Following implementation of the TP on a regular (probably annual) basis.

It will be necessary for Council to take a role at each stage in the TP evaluation. It is suggested that pre-implementation (that is, at the planning permit application stage) a simple tick box pro forma can be used to quickly evaluate an outline TP. This will simplify and standardise the process, ensuring it is easily understood by both applicants and Council staff. Feedback can be given easily to the applicant by planning staff without the need for discussions with staff from other areas of Council.

A similar, although more detailed, approach can be taken to the evaluation of a detailed TP. Using a standardised process, staff can ensure the TP meets key requirements, incorporates appropriate measures for the size and location of the development and, if implemented, will result in real travel behaviour change. Suggested formats for pro formas to evaluate TPs at the outline and detailed stage are included in **Appendix E**.

Ongoing evaluation of the TP will be potentially more complex. In the previous section it was suggested that an annual monitoring activity is included within the TP and this can be established through evaluation of the outline and detailed TP. Council should require submission of the annual monitoring report to assist in evaluation of the TP. A suggested structure and content of an annual monitoring report is contained in **Appendix F**.

Clearly if a workplace fails to submit an annual monitoring report there is an evaluation issue which would need to be pursued by Council. A submitted monitoring report can be subjected to a pro forma type approach. For example, has the plan met set targets for the year? The more standardised the process at the outset with guidance on the form of the plan and monitoring reports, the more likely a standard approach to evaluation can be adopted.

Given the risk that workplaces may submit a monitoring report based on false data there is a perceived need to ‘spot check’ workplaces to ensure the monitoring report is accurate and the TP has been implemented as stated.

In NSW recent planning decisions requiring a TP have included an allowance for rigorous reporting and external monitoring with penalties should the TP not meet set targets. This gives the responsible planning authority real power to ensure the TP succeeds in meeting its set objectives and targets.

5.2 Enforcement

Enforcement only becomes an issue after the planning permit has been granted. The enforcement of the TP condition will be similar to the enforcement of any other condition attached to a planning permit. Should the applicant, landowner or occupant fail to comply measures can be taken to ensure compliance.

It is suggested that Council is clear in their advice to planning permit applicants on what enforcement action will be undertaken in the event a TP condition is not met. A suggested format has been included in the guidelines contained in **Appendix A**.

5.3 Roles and Responsibilities

Clearly the responsibility for evaluation lies with Council, as does the enforcement of planning permit applications and where necessary assistance through VCAT is available to support Council in enforcing conditions. The use of clear applicant guidelines on the format of a TP, a stated monitoring requirement and structured penalties will minimise the role of Council, simplify the process for both Council officers and the applicant/workplace and introduce a transparency into the overall process.

6.0 Recommendations

This section summarises the study and key recommendations.

The study has focused on the introduction of a requirement for travel plans to accompany planning permit applications for larger developments within the City of Darebin. The central objective of the study is the integration of a travel plan requirement with the existing planning permit application process and without the need for changes to the planning scheme. It was also identified that the requirement be enforceable and not based on subjective judgements by Council staff, thus making the applicant's position clear from the outset.

The recommendations are summarised below:

- Council should pursue an amendment to Clause 22 (Local Policy Framework) to support the TP requirement.
- Travel plan requirements and the operation of the planning scheme will be examined in the next review of the Darebin planning scheme.
- Council should, in the medium to long term, consider the use of zones where all multi-unit residential, office and industrial development requires a planning permit.
- Council should require all planning permit applications meeting one (or more) of the following criteria to submit an outline travel plan with their planning permit application and enter the travel plan process:
    - Units – 20 units and above
    - Offices (or an office component of a mixed use development) – 500sqm and above
    - Industrial – 1,000sqm and above
    - Retail – 1,000sqm and above
- Council should monitor the number of planning permit applications meeting the above criteria closely.
- Council should review this document annually to assess its value to Council's planning staff, planning permit applicants and subsequent building occupiers in achieving Council's objectives and providing sufficient advice and guidance. Reviews should include discussions with Council staff, planning permit applicants and occupiers.