



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

1. PROJECT BACKGROUND

The Action Plan for Planning Reform sets out three goals and 19 initiatives to deliver a streamlined contemporary and fit-for-purpose planning system to meet the varying needs across Western Australia into the future. In May 2020 the delivery of the Action Plan was modified to enable earlier implementation of those initiatives that were identified as providing key support to the State's COVID-19 economic recovery plans.

In mid-2021 an extensive consultation program was undertaken to help shape and inform the key priorities for the next phase of reform. The reform measures are being implemented through legislation, regulations, and policy, and are supported by expanded and improved guidance documents.

The reforms are to create a planning system that is:

- More consistent across the State, yet maintains flexibility where required
- Consistent and efficient, through greater coordination across Government and improved approvals processes
- Easier to understand and navigate, making clearer information more easily available
- Supports the opportunities presented through METRONET, city-changing and major infrastructure projects
- Creates great places for people, with new guidelines for medium density development and liveable neighbourhoods.

Under Goal C - *Planning systems are consistent and efficient*, and initiative C2(ii) - *Car parking requirements in commercial and mixed use centres are consistent*, the development of a consistent approach to car parking in town centres and other non-residential areas is identified as an action for reform. The project to support this initiative commenced in October 2021.

2. PROJECT APPROACH

The approach to developing options to non-residential car parking rates in alignment with the Action Plan for Planning Reform was based on a number of stages. These stages focussed on technical assessment and stakeholder engagement and built on work undertaken previously through the Department of Transport (DoT) and the Western Australian Local Government Association (WALGA).

The technical assessment which informed the initial broad options to consider within this project were completed in December 2021. These options, which comprised four groups and 11 separate approaches, were used and formed the basis for an extensive engagement process throughout early 2022.

Engagement through a series of face-to-face or online workshops was conducted with a range of groups, and additional one-on-one meetings were held with a range of parties, including State Government agencies, advocacy organisations, community members and Local Governments.



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

Key stakeholder feedback was aligned on moving away from the status quo, while recognising the inconsistency of rates, ad-hoc rates being established for different areas, and approaches to parking reflecting an absence of recent and accurate research into current parking need.

Stakeholder feedback also identified that a move towards adopting maximum parking rates for non-residential land uses, combined with implementing precinct based planning, was the preferred approach going forward.

Stakeholders also wanted to see a transition approach to parking management changes, guidance from State Government on an interim approach to better meet parking demands for the different centre types, and longer-term State Government guidance on a process that allows all users to transition successfully. The proposed draft Interim Guidance addresses these requirements of stakeholders.

After analysis of stakeholder feedback, centre types, parking regimes across different Local Government Authority (LGA) areas and the legislative provisions for parking in WA, the recommended approach going forward was to adopt maximum parking rates for non-residential land uses, combined with implementing precinct based car parking regimes. This approach was presented to the Western Australian Planning Commission (WAPC) in August 2022. At the meeting of 31 August 2022, the WAPC resolved to:

"endorse the following recommended approach to car parking requirements and associated actions for car parking for non-residential land uses (as noted in the report):

- i. develop interim guidelines, in conjunction with the Department of Transport, to support local governments in any immediate review of applicable parking rates;*
- ii. consult with local government on and before finalising the interim guidelines;*
- iii. review guidance on payment-in-lieu of parking plans, so that it can only apply in activity centres (district and above) or precincts - and undertake subsequent updates to the Regulations; and*
- iv. develop guidelines, including car parking rates, based on evidence-based research, in conjunction with WALGA and the Department of Transport."*

Given the resolution of the WAPC, the proposed draft Interim Guidance forms the basis for the first two items and the platform to undertake engagement and then report back to the WAPC on the preferred approach.

This initiative is also aligned with the Planning Reform project for 'Consistent Local Planning Schemes - zones, land use definitions and permissibility' that is currently being progressed by the Department of Planning, Lands and Heritage (DPLH). It is expected that this Interim Guidance will be updated to reflect future changes to the Planning and Development (Local Planning Schemes) Regulations 2015 as a result of this project.



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

3. TECHNICAL REVIEW

With the resolution of the WAPC, technical assessment commenced in September 2022 aiming to determine:

- Precinct based approach to car parking for non-residential land uses
- Mechanisms to deliver on appropriate minimum and maximum car parking provisions for all non-residential land uses within Perth and Peel.

The technical assessment was progressed according to the following steps:

- Technical review of a range of existing non-residential rates and their application to development
- Development of range of car parking rates based on a framework covering land uses as deemed appropriate by DPLH to ensure consistency with Planning Reform
- Examination of rates in the context of precincts as per SPP 4.2 and SPP 7.2
- Completion of a comparison exercise using existing and proposed rates
- Development of draft interim guidance.

The technical review, which formed the basis of the recommendations in the proposed draft Interim Guidance document, examined the following four elements:

- Review of precinct based parking using development scenarios
- Review of precinct car parking requirements for non-residential land uses
- Review of Service Commercial car parking requirements for non-residential land uses
- Review of industrial land use parking rates.

3.1 Review of Precinct Parking Requirements for Development

For the review of precinct based parking rates, this focused on the overall outcomes that could be delivered on development sites within 20 existing precincts, activity centres, structure plan areas or local development plans around the Perth and Peel region.

Existing car parking provisions were examined for the 20 separate locations, of which:

- three were inner-city locations
- 10 were middle suburban locations
- seven were outer-metropolitan locations

In terms of the level of the activity centres nominated within the hierarchy of SPP 4.2¹:

¹ The review excludes the Perth capital city area which is subject to the Perth Parking Policy 2014



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

- seven were secondary
- six were strategic
- five were district

Ten of the locations were directly serviced by train stations. This allowed for a sub-assessment of the approach used in locations where overall transport accessibility should be a consideration.

To test the existing levels of parking required for development proposals within these 20 activity centres, five separate development scenarios were used. These scenarios are derived from project work undertaken by consultants, from applications that had progressed through either SDAU or JDAP processes or were already constructed. Some minor details were altered but using these scenarios allowed for 'real world' testing.

Each of the scenarios then had the minimum and maximum parking requirements calculated.

Some activity centre or precinct plans did not stipulate maximum levels of parking, some did not stipulate minimum levels of parking. Some land use classifications were relatively broad for precincts and other plans required use of some provisions from the respective local planning schemes to complete the assessment.

When calculating the levels of parking, no dispensations or discounts were applied as a direct comparison for the base level of non-residential parking or 'like for like' for all precincts was needed.

The overall level of parking requirements for each of the development scenarios tested fluctuated substantially around different activity centres.

In reviewing the development outcomes, some very clear patterns emerged. The first and most important was that there was a significant inconsistency in how minimum and maximum parking requirements are applied throughout Perth and Peel. This was one of the primary issues raised by stakeholders through earlier engagement and the technical work undertaken had reinforced this point.

Where an activity centre had both minimum and maximum rates stipulated, on average the maximum allowed parking for all the scenarios tested was around 2.8 times the minimum level. This multiplier was consistent irrespective of location, size of the activity centre or scale of the development scenario tested.

Where a train station was within an activity centre, the average number of minimum parking bays required did reduce by around 25% compared to those centres without a train station, however the maximum parking requirement reduced by less than 10% when compared to those centres without a train station. From this outcome, it could be deduced that existing mechanisms were considering reduced site parking based on accessibility however they were not considering more robust maximums to support travel demand management.

The scale of difference for site base parking requirements raised a number of considerations for precincts, including:



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

- Area of land required for minimum and maximum non-residential parking and how this impacts development outcomes or the ability for a precinct to evolve into a great place
- Cost associated with provision of parking – either on-site or within the public realm
- Practicality of providing levels of parking considered within plans
- Inefficiencies in the transport network as a whole – in particular within higher order activity centres
- Inequity in transport accessibility
- Potential to deliver parking associated with payment in lieu.

3.2 Review of Precinct Based Non-Residential Parking Rates

To inform how parking management plans for activity centres and development requirements for land uses within precincts or areas covered by SPP 4.2 or SPP 7.2 are applied, existing non-residential parking requirements for individual land uses within the precinct's plans were assessed.

Five separate locations were examined, with some additional assessment around application of different rates also completed.

From the assessment, there were 29 individual land uses that were consistently listed within statutory provisions for the precincts – those land uses that were permitted or through discretion.

For each land use classification, a development scenario was developed, and the parking requirements calculated. As with the precinct exercise,

these scenarios were derived from project work undertaken by consultants, from applications that had progressed through either SDAU or JDAP processes or were already constructed. Some minor details were altered but using these scenarios allowed for “real world” testing.

That testing showed similar outcomes to the overall precinct based assessment – on average, allowances for maximum levels of site parking were over three times higher than minimum levels of parking. In addition, the assessment of the five separate locations showed significant variations in the amount of parking allowed for the same land use.

This fluctuation was typically due to the variance in approach of calculating parking in the first instance. An example of this is shown below for a restaurant land use – all five calculations within the precincts are different and use different calculation elements:

- Location 1 - One (bay) for: (a) each 12.5m² of gross leasable area; or (b) Every four seats provided (other than in an alfresco dining area), whichever is greater
- Location 2 - 1 bay for every 8 (6) persons the building is designed to accommodate
- Location 3 - 1 bay per 25m² NLA
- Location 4 - Minimum: 1 space per 100m² NLA. Maximum: 1 space per 50m² NLA
- Location 5 - 1 bay per 10m² PFA, plus 0.5 bay per staff member.

The fluctuation in calculation elements in this instance showed that a similar development in one precinct would require only two spaces,



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

whilst in another it would require 26. Using elements such as staff numbers also allows for interpretation and then variance in use should a different owner or type of restaurant evolve in the future.

3.3 Review of Service Commercial Land Use Parking Rates

As with precincts, existing non-residential parking requirements for individual land uses within Service Commercial or Business Commercial zones in Perth and Peel were assessed. No residential based land uses within the zones were considered.

Six separate locations were examined using LGA that had substantial areas of Service Commercial land use, with some additional assessment around application of different rates also completed.

From the assessment, there were 40 individual land uses that were consistently listed within statutory provisions for the Service Commercial or Business Commercial zones – those land uses that were permitted or through discretion.

For each land use classification, a development scenario was developed, and the parking requirements calculated. As with the precinct land uses exercise, these scenarios were derived from project work undertaken by consultants, from applications that had progressed through either SDAU or JDAP processes or were already constructed. Some minor details were altered but using these scenarios allowed for “real world” testing.

That testing showed similar outcomes to the precinct land use based assessment, however the overall average difference between minimum

and maximum allowances was slightly lower. Allowances for maximum levels of site parking were around two times higher on average than minimum levels of parking when taking into consideration the total amount of parking that could be provided within the development scenarios used.

The assessment of the six separate LGA provisions did however show significant variations in the amount of parking allowed for the same land use outcome.

Given the majority of these locations were in middle-urban or outer urban locations, the high level of variance should not be embedded within the existing system.

This is particularly the case given the uniformity in both development typology in Perth and Peel (a big box retail outlet has similar if not identical footprint no matter where it is sited) and characteristics of the surrounding catchments (high dependency on car travel, relatively consistent demographic profiles, uniform housing typologies, planned outcomes delivered under prior/existing State Planning Policies).

3.4 Review of Industrial Land Use Parking Rates

Parking requirements for individual land uses within industrial zones in Perth and Peel were assessed. Six separate locations were examined using LGA that had substantial areas of industrial land use, being:

- Kalamunda
- Kwinana



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

- Cockburn
- Gosnells
- Wanneroo
- Canning

From the assessment, there were 29 individual land uses that were consistently listed within statutory provisions for industrial zones – those land uses that were permitted or through discretion.

For each land use classification, a development scenario was developed, and the parking requirements calculated. As with the other exercises, these scenarios were derived from project work undertaken by consultants, from applications that had progressed through either SDAU or JDAP processes or were already constructed. Some minor details were altered but using these scenarios allowed for 'real world' testing.

Testing showed a higher overall average difference between minimum and maximum allowances. Allowances for maximum levels of site parking were nearly four times higher on average than minimum levels of parking.

As with other land use groupings, the assessment of the six separate LGA provisions did show significant variations in the amount of parking allowed for the same land use outcome. Some of these variations were due to the elements within the calculation (similar to Service Commercial) but may also be due to interpretation of land use footprint.

Notwithstanding the higher level of variation, industrial land uses are seen as being overtly car dominant in terms of accessibility. This is due to

a range of factors including location towards the urban fringe of Perth and Peel, workforce profile, accessibility by public transport being generally poor, spacing and scale of land uses and timing of employment shifts.

It therefore follows that the levels of car parking within schemes would cater for specific demands and use calculations that vary compared to those seen in activity centres. For example, using the number of staff on site as a one-to-one ratio for on-site parking is a specific measure to ensure every person on site has access to one car bay – no alternative form of access is considered necessary/ available.

Recognition should be given, however, to all the accessibility factors that are evident in industrial areas that are likely to continue over the following decades unless there is systemic change in transport and land use patterns.

In particular, industrial locations attract a variety of land uses that adapt or alter in terms of scale, layout, floorspace and employment numbers. These factors make development of some maximum parking rates for specific land uses difficult and therefore a level of discretion can be seen as an appropriate mechanism.

This discretion could be utilised to ensure overall development competitiveness is maintained and viability of employment zones on urban fringes is appropriate.

The wide ranging gap between minimum and maximum provisions also highlights that industrial land uses should all be able to contain provisions



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

on site, and therefore payment in lieu of parking provisions in industrial areas is not an appropriate planning tool, nor should it be supported by the WAPC.

3.5 Approach to developing Rates for Individual Land Uses

Where site-specific ratios were considered for a precinct, Service Commercial and industrial land uses, the following approach was undertaken to develop the minimum and maximum ratios:

- Rates for six schemes or plans for each area were examined and current parking requirements were derived
- Land use development proposals were developed for each land use category and the level of parking required was derived
- Using these outcomes, a minimum on-site parking rate was developed for each land use that was either at or below the minimum level of the six schemes assessed
- A maximum on-site parking rate was then developed that was above or at the average level of the six schemes assessed. This ensures that outlier application of rates is removed and development outcomes under existing regimes would still be able to be delivered. These rates require testing at local level as part of the Interim Guidance
- To make rates more efficient and consistent, the number of elements within the minimum and maximum parking rates

proposed within the Interim Guidance was minimised, with most rates applying a Floor Area (FA)² or number of people a site can occupy basis for calculation.

An example of this approach is provided for a Motor Vehicle Repair land use within a Service Commercial zone as context, below.

Motor Vehicle Repair land uses are permitted or discretionary within all six of the LGA reviewed for the Interim Guidance. All schemes had different approaches to calculating a minimum level of parking associated with the proposed development. These approaches were:

- 1 per 50m² NLA
- 4 spaces for each working bay plus 1 space per employee
- 1 space per 100m² NLA
- 1 bay per 40m² of GFA
- 7 bays per 100 sqm or 6 bays per 100 sqm when over 5000m² GLA
- 1 space for every 50m² of open space used for industrial purposes, plus 1 space for every 50m² of GFA; or 1 space for each employee, whichever is the greater.

Using a proposed development of a repair centre of 450m² with three working bays and employing seven people, the six schemes had on-site parking requirements of a minimum of:

- 8 bays

² As defined under Part 6, Clause 37 within Schedule 1 of the Planning and Development (Local Planning Schemes) Regulations 2015.



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

- 19 bays
- 4 bays
- 11 bays
- 32 bays
- 7 bays.

These outcomes required a minimum of 4 bays and an average of 13 bays for the same development type in six different LGA in Perth and Peel.

Taking these outcomes into account, the proposed minimum and maximum on-site parking rates for a Motor Vehicle Repair land use are:

- Minimum - 1 space per 100m² FA (5 bays)
- Maximum – 1 space per 30m² FA (13 bays)

Using this approach, the minimum number of bays proposed within the Interim Guidance caters for an outcome at or near the lowest level that presently exists within the six LGA and the maximum rates proposed cover the minimum existing requirements of four out of six of the schemes analysed.

The maximum level of parking allowed within the Interim Guidance is also at the average of all six schemes and provides a simplistic approach to the calculation of required parking using a floor area, rather than a range of variable factors.

4. TECHNICAL REVIEW OUTCOMES

The outcomes of the technical review established that there was:

- significant variation in development requirements for on-site parking around Perth and Peel regions and this is an inconsistent and inefficient means of delivering more appropriate development outcomes and places
- existing regimes within a large number of Local Government planning frameworks also support a significant variation in on-site parking provision where there should be more consistency or justification for large variations. Previous research for WALGA also confirmed this
- disparities between approaches within LGA areas must be addressed
- within precincts, some schemes and plans have adopted zero minimum parking requirements for some non-residential development. Many still use “bands” of appropriate levels of parking, with minimum site requirements also supporting the ability to use payment in lieu of parking as a planning tool
- for precincts that have train stations directly servicing them, minimum requirements were somewhat lower but maximum requirements were not used to set a much lower “ceiling” of parking when compared to precincts that do not have train stations
- the range of elements that are included in calculations for non-residential parking rates is also significant and results in high levels of inconsistency in development requirements across the Perth and Peel region
- for Service Commercial land uses, the relatively homogenous form of development within these zones, typically car-dominant in terms



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

of transport accessibility but some with good corridor accessibility for public transport, means that there is a lesser variance between the minimum and maximum provisions seen in existing schemes.

Significant variations, however, do exist

- within industrial areas a range of factors, including location towards the urban fringe of Perth and Peel, workforce profile, accessibility by public transport being generally poor, spacing and scale of land uses and timing of employment shifts, all contribute to higher levels of existing on-site parking and also use of discretion in assessing site parking allowances.

These conclusions fed into the four options being considered for the Interim Guidance.

5. OPTIONS FOR THE CALCULATION OF CAR PARKING REQUIREMENTS

To determine consistent car parking requirements for non-residential land uses within the Perth and Peel region, four options are being considered. These options are not intended to apply retrospectively or to development being considered by LGA prior to the adoption and/or transitioning of non-residential parking rates to those proposed within the Interim Guidance.

These options are consistent with the approach considered by the WAPC – in favour of revised minimum parking requirements and maximum parking levels being introduced for all non-residential land uses.

The four options are:

- Apply a flat ratio
- Apply a ratio for each land use
- Apply a calculation measure to existing rates
- Have existing minimums as maximums and minimum as zero (where already used) or a ratio of the maximum.

Option 1 - Apply a flat ratio

This form of control is already in place in a number of precincts, such as the Scarborough Redevelopment Area. The controls involve a blanket minimum and maximum control for all non-residential land uses within a specific area, with the flat ratios not differentiating between land uses within the precinct.

An example of this form of control is:

- Minimum requirement of zero where already stated or one parking bay per 100m² of non-residential FA
- Maximum requirement of one parking bay per 50m² of non-residential FA

Option 2- Apply a ratio for each land use

Developing individual ratios for each land use has been tested as part of the technical assessment completed for the Interim Guidance. This approach is the same as the first, but rather than having a precinct wide single ratio, each land use throughout the Perth and Peel region is treated



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

individually in much the same way that existing controls in planning schemes operate. An example of this form of control is:

Land Use - Convenience Store

- Minimum requirement of zero where already stated or one parking bay per 50m² of FA
- Maximum requirement of one parking bay per 20m² of FA.

This approach could also use a ratio for the calculation of the maximum if there is a stated minimum. For example, rather than setting a maximum requirement based on FA, a ratio of 1.25 x minimum could be used.

This approach does not work if land uses have a zero minimum parking requirement. Where existing schemes have a minimum ratio that is lower than proposed within the Interim Guidance, a zero level could be applied instead.

Option 3 - Apply a calculation to existing rates

This option uses rates that are already established within local planning schemes or precinct plans and then adjusts them to right-size minimums and then develop maximums where they are not in place.

This option allows for existing mechanisms within local planning schemes to be retained, which may reflect some local nuances in development frameworks. An example of this form of control is:

- Minimum requirement of zero where already stated or using existing minimum requirements and multiplying by 0.75

- Maximum requirement of zero where already stated, at discretion of Council or the minimum requirement multiplied by 1.2.

Option 4 - Existing Minimums as Maximums

This form of control allows the existing minimum parking requirements in schemes or precinct plans to be applied as a maximum instead. With that maximum set, the minimum required is then reflected by a ratio calculation, effectively reducing the minimum requirement. An example of this form of control is:

- Minimum requirement of zero where already stated or using maximum requirements and multiplying by 0.75
- Maximum requirement is volume of parking currently required within a scheme or plan presently stated as a minimum or at discretion where required

6. CONSIDERATION OF OPTIONS AND APPROACH

The outcomes of this project must align with the Action Plan for Planning Reform, in which overall reforms are proposed to create a planning system that is:

- More consistent across the State, yet maintains flexibility where required
- Consistent and efficient, through greater coordination across Government and improved approvals processes



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

- Easier to understand and navigate, making clearer information more easily available
- Supports the opportunities presented through METRONET, city-changing and major infrastructure projects
- Creates great places for people, with new guidelines for medium density development and liveable neighbourhoods

Using this overall framework, each of the options being considered within the proposed Interim Guidance document were assessed on the basis of how they achieved the requirements of the Action Plan for Planning Reform or, conversely, the outcomes did not achieve the requirements.

Separately, each of the three broad land use areas being considered, activity centres/precincts, Service Commercial/Business Commercial and industrial zones were assessed to determine if some options were better suited than others. This, by extension, also underlines that stakeholder engagement message which highlighted that there may be a range of solutions for different places.

The headline, or summary, implications for each proposed option being implemented within the land use zones when set against the Action Plan for Planning Reform requirements, is set out in the following table.

	Activity Centre/ Precinct	Service Commercial / Business Commercial	Industrial
Apply a flat ratio	Appropriate	Less Applicable	Not Appropriate
Apply a ratio to each land use	Less Applicable	Appropriate	Appropriate
Apply a calculation measure to existing rates	Not Appropriate	Less Appropriate	Less Appropriate
Have existing minimums as maximums and minimum as zero or a ratio of the max	Not Appropriate	Less Appropriate	Not Appropriate



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

The assessment considering land use categories provided some clarity around how different options may be suitable for specific locations or land use types. It became clear through this assessment, that a combined or location specific approach to introducing broad-based minimum and maximum provisions for non-residential car parking rates would be the most appropriate form of policy response. This was also a consistent thread during engagement with wider industry and stakeholders early in 2022.

Where site-specific ratios were considered for precinct, Service Commercial and industrial land uses, the approach outlined in Clause 3.5 of this Report was undertaken to develop the minimum and maximum ratios.

Given these outcomes, the following approach is recommended within the draft Interim Guidance document:

- i. For precincts and activity centres at a district centre level or higher, a parking cap is to be established for non-residential land uses, as per guidance and requirements set out within SPP 4.2 and SPP 7.2. These caps are to be established as planning for these activity centres is formalised.
- ii. Within precincts and activity centres nominated through SPP 4.2 within the Perth and Peel region at a district centre level or higher,

a flat ratio of non-residential car parking be established on the basis of:

- A minimum of zero where this is already established
- For all land uses where a minimum is not established, one parking bay per 100m² of FA
- For all land uses, a maximum of one parking bay per 25m² of FA

- iii. Within precincts and activity centres nominated through SPP 4.2 within the Perth and Peel region lower than a district centre classification, rates set out in **Appendix A** to form the basis for determining parking requirements for those precincts. Considerations within those policies must be based on the requirements of SPP 7.2.
- iv. Within Service Commercial and industrial³ land use zones, appropriate minimum and maximum non-residential car parking rates be established for all land uses based on rates set out in **Appendix B and Appendix C** of the draft Interim Guidance document.
- v. Where land uses are not explicitly included, LGA to recommend proposed minimum and maximum rates based on empirical data.

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



Car parking requirements for non-residential land uses in Perth and Peel - *Background Report*

- vi. Within Service Commercial and industrial land use zones, discretion based on individual assessment by the LGA to be allowed for those land use classifications set out in **Appendix D** of the draft Interim Guidance document. 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 the applicants.

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