

Standards Australia
GPO Box 476
Sydney NSW 2001

Submitted via webmail
communications@standards.org.au

24th October 2023

Dear Standards Australia,

Re: Revisions to AS/NZS 2890.1:2004 - Parking Facilities - Part 1: Off-street car parking

Thank you for the opportunity to provide feedback on the proposal to enlarge the standard size of off-street parking bays.

Bicycle NSW has been the peak bicycle advocacy group in NSW for forty-seven years and has more than 30 affiliated local Bicycle User Groups. Our mission is to 'create a better environment for all bicycle riders', and we support improvements to facilities for pedestrians and cyclists. Bike riding provides a healthy, congestion-reducing, low-carbon form of travel that is quiet, efficient, and attractive for all ages with the correct infrastructure design.

Bicycle NSW strongly opposes the increase in parking bay length from 5.4m to 5.6m to accommodate large vehicles. This proposal, in our view, is a grave misstep in urban planning that has the potential to cause a myriad of knock-on problems.

The rise of oversized cars in Australia, a trend that has been significantly influenced by the United States and turbocharged through tax incentives, has been coined "autobesity" and is discussed in our recent article, [The Weight We Share](#). This trend poses significant threats to future health and wellbeing with significant impact on road safety, air quality, climate change, and urban space utilization.

The construction of larger parking spaces will further encourage purchase of larger cars by making ownership more convenient. More oversized vehicles on our streets will in turn increase the demand for parking spaces capable of accommodating them. Urban planning regulations continue to require the same number of parking spaces, leading to an increase in the total area dedicated to parking.

More concrete in our cities will increase flooding risks and reduce space for tree planting, essential to reduce urban heat and improve liveability. Destinations are pushed further apart by addition parking, making them harder to reach on foot and increasing car dependence. New car parks will need to be not only larger, but also stronger to bear the weight of more 2-tonne+ vehicles. There will be adverse effects on housing affordability if developments are required to increase the size of parking garages.

And of course, incentivising people to buy large cars and light trucks has serious consequences for the safety of pedestrians, cyclists and vulnerable road users. These vehicles increase the fatality rate by 30% due to the combination of higher mass and speed during collisions with other road users who lack the protection of a similarly sized vehicle. Oversized cars also have substantial blind spots, which pose a significant risk to children, smaller adults, and individuals with mobility challenges. The risk of head traumas and serious injuries also increases with higher chassis collisions.

The size of a typical light trucks (ute) or SUV in Australia continues to swell. These vehicles are increasingly unsuitable for general household use in densely urbanised areas. But even larger vehicles are now gaining

in popularity, with supersized American pick-up trucks, which are 25% heavier, 35% wider, 15% longer, and consume 54% more fuel, [exacerbating the impact on our cities](#).

The implications for the environment are alarming. University of Melbourne data has revealed that over [11,000 Australians die prematurely each year](#) due to vehicle pollution. Furthermore, despite Australia's efforts to combat climate change, data from the [Climate Council](#) indicates that emissions from light commercial vehicles increased by about 20% between 2012 and 2020.

There are further health implications. Currently, Australian children are among the [least physically active globally](#) and face higher risks of premature death due to motor vehicle accidents. This concerning scenario, coupled with the obesity epidemic, can be directly linked to a car-centric approach in urban planning.

The urgent need to nudge people to smaller, more efficient and safer vehicles (including bicycles!) is a key advocacy position for Bicycle NSW.

In this context, it is imperative that Standards Australia reconsiders its stance and prioritizes the welfare of the community over the interests of the car industry. It is crucial that public health and safety take precedence, along with the need to adhere to Australian and international environmental standards aimed at reducing carbon emissions.

When people choose to drive larger vehicles, they should bear the full cost of that choice, rather than passing it on to the community in terms of compromised public safety and reduced air quality. This perspective is not only supported by logic but aligns with the principles of fairness and social responsibility.

If any change is to be made to AS/NZS 2890.1:2004, we suggest *reducing* the size of parking spaces in prime locations close to the entrance of buildings. This would encourage more people to drive smaller cars.

In conclusion, we urge Standards Australia not to proceed with the proposal to enlarge parking bays for oversized vehicles. Doing so would only exacerbate the problems associated with "autobesity" and contradict the principles of public safety, environmental sustainability, and efficient urban planning. Standards Australia must maintain its pivotal role in safeguarding these principles.

Thank you for your attention to this critical issue, and we look forward to your thoughtful consideration of our concerns.

Yours faithfully,



Francis O'Neill
Head of Advocacy