

9 November 2023



Director
Standards Australia
Level 10, The Exchange Centre
20 Bridge Street,
Sydney, NSW 2000

Dear Director

Submission to Standards Australia by Better Streets on proposal to lengthen car parking space

Thank you for the opportunity to comment on the proposed changes to the “Parking facilities, Part 1: Off-street car parking” standard, currently under consultation by Standards Australia.

The Urban Development Institute of Australia (**UDIA National**) is the development industry’s most broadly represented association, spanning the entire housing market across more than 2,000 member organisations – including top tier global enterprises, specialist consultants, local governments and large and small-scale housing providers.

The construction and development industry drives 9% of Australia’s GDP, creates 1.156 million jobs and generates over \$360 billion in economic activity each year.

UDIA National supports the Federal, State, and Local Government in their policy development, and hopes that the standards underpinning policy settings are appropriately set up to enable the efficient development of land for the best possible outcomes for our communities.

Unfortunately, the changes being put forward by Standards Australia appear a retrograde step, and come at the worst possible time for the development and construction industry in Australia.

We do not support increasing the length of off-street car parking spaces from 5.4m to 5.6m. It will involve considerable additional cost from additional space required for carparking and reduce available space for other amenity. Ultimately, this change further erodes project viability at a time when industry has experienced an annual rise in construction costs across the industry of more than 17%, weighted across all capital cities.

While the proposal seems to suggest a negligible increase to the size of individual car park spaces, UDIA National contends that the cumulative impact of increasing car space requirements will create a net negative impact on the potential highest and best use of the land, as well as a significant impact on costs.

These changes will ultimately enable fewer spaces to be built with the same defined area. Therefore, additional basement levels or podiums will be required to support driver's demand, driving up the cost per parking space and negatively impacting the overall development feasibility. This increased cost will need to be passed on to the end user and community.

Further, this change to the Standards is counter to emerging Government priorities that is gradually moving away from private vehicle ownership and usage, citing the environment benefits of a more connected network of major public transport infrastructure. These changes instead directly respond to a trend of increased car use, which runs counter to the objectives of Government, urban planning theory and community aspirations.

While the changes imposed could be offset by decreasing the number of car spaces, this would require a number of simultaneous changes to Local Government controls, which would create another bottleneck in the already constrained resources of Local Governments nationwide.

UDIA National recommends that Standards Australia do not adopt these changes at all.

Please do not hesitate to contact the UDIA National Head of Policy and Government Relations - Andrew Mihno on 0406 454 549 to discuss any aspect of this submission further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Col Dutton', with a small dot at the end.

Col Dutton
UDIA National President