

Public Transport Users Association

Submission on car and bicycle parking requirements reform

in response to

Department of Transport and Planning
Discussion Paper

17th October 2023



**PUBLIC TRANSPORT
USERS ASSOCIATION**

Introduction

The Public Transport Users Association (PTUA) welcomes the opportunity to provide a response to the car and bicycle parking requirements discussion paper.

Mandated car parking minima impose large costs on home buyers and tenants¹, businesses and their customers². Car parking also frustrates efforts to create healthy, climate-resilient cities due to the creation of urban heat islands³ and large areas of impervious surface⁴. With their lower space requirements, larger roles for active and public transport can reduce these financial and environmental costs and contribute to more liveable cities (Figure 1).

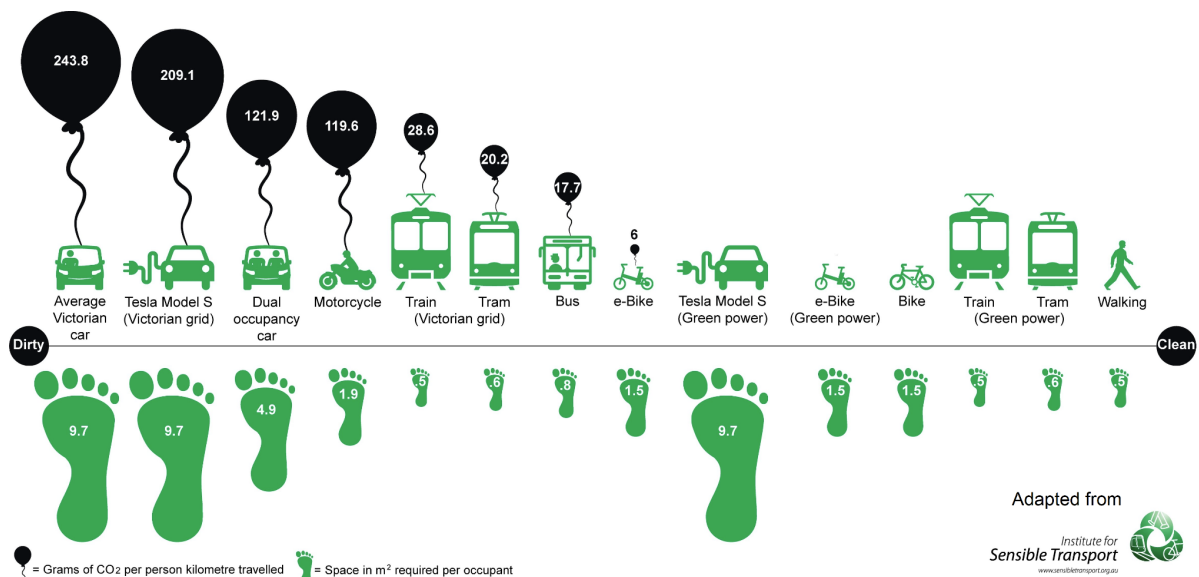


Figure 1: Carbon emissions (top) and urban space requirements (bottom) for different transport modes and energy sources. Note that space requirements for cars may increase in future if parking space standards are revised to allow increased vehicle sizes.

Therefore the PTUA supports proposals to reduce the large impost of car parking minima on communities and the environment. We note that the city of

¹ Shu Shu Zeng, 'Australians paying \$6 billion for unused apartment parking', RMIT, 2023, <https://www.rmit.edu.au/news/all-news/2023/mar/unbundled-parking>

² Donald Shoup, *The High Cost of Free Parking: Updated Edition* (Routledge, 2017)

³ Catie Gould, 'To stop building heat islands, stop overbuilding parking lots', Sightline Institute, 2022, <https://www.sightline.org/2022/01/11/to-stop-building-heat-islands-stop-overbuilding-parking-lots/>

⁴ Erica Gies, 'Expanding Paved Areas Has an Outsize Effect on Urban Flooding', *Scientific American*, 2020, <https://www.scientificamerican.com/article/expanding-paved-areas-has-an-outsize-effect-on-urban-flooding2/>

Austin, Texas - a large, car-dependent city in the USA - has recently voted to abolish car parking minima.⁵ Rather than merely lowering parking minima, their complete abolition should also be considered in Victoria. We also support requirements for bicycle parking to be provided due to its lower space requirements, the role of end-of-trip facilities in mode choice, and the potential of cycling as a last mile solution where public transport feeder services are currently inadequate⁶.

We discuss the specific proposals contained in the discussion paper below.

Proposal 1, Public transport accessibility level (PTAL):

- The PTUA strongly supports the reduction and/or abolition of car parking minima, and the introduction/reduction of car parking maxima particularly around Public Transport (PT) where the current and/or potential PT mode share is greatest.
- The PTUA supports calculating PTAL with walking access to PT services on the PT network, however, suggests also including cycling access to PT in the calculation.
- The PTUA supports PTAL based car parking requirements in regional Victoria, with the caveat that active transport should also be considered. Many areas of regional Victoria with poor or low PTAL levels are already conducive to active transport and many others have potential for moderate to high active transport connectivity between residential, commercial, educational and other such areas. Both car and bicycle parking rates should reflect the significant potential for active transport by both employees and visitors that reside or are staying within that city or town. We note that regional Victoria is not immune from the effects of car parking minima on housing affordability, business costs and climate resilience mentioned in the introduction.⁷ Regional centres often have great potential for cycling for transport due to their smaller geographic size and lower traffic density compared to larger metropolitan cities.⁸ However this potential is not being fully realised due to a lack of cycling facilities and excessive car parking provision. A reduction in car parking

⁵ Kea Wilson, 'Austin Becomes The Largest U.S. City to Eliminate Parking Minimums', StreetsBlog USA, 2023, <https://usa.streetsblog.org/2023/11/03/austin-becomes-the-largest-u-s-city-to-eliminate-parking-minimums>

⁶ Ioannis Kosmidis & Daniela Müller-Eie 'The synergy of bicycles and public transport: a systematic literature review', *Transport Reviews*, 2023, <https://www.tandfonline.com/doi/full/10.1080/01441647.2023.2222911>

⁷ Shoup, op. cit.

⁸ Handy, S., Heinen, E., & Krizek, K. 'Cycling in small cities'. In John Pucher, Ralph Buehler (2012) *City Cycling*, 257-286.

requirements and an increase in bicycle parking requirements would help to encourage cycling in such locations.

- Continued existence of the Parking Overlay should not mean the inertial continuation of existing parking overlays based on pre-reform parking requirements. They should all be reviewed as part of the reforms, and reformed as needed, so they are based on the new parking policies and recent or planned public transport provision not reflected in the existing overlay.
- The PTUA strongly supports the digital implementation of PTAL information in VicPlan and also recommends that spatial data be made available on data.vic.gov.au.

Proposal 2, new land use groups:

- The PTUA broadly supports the new land use categories and categorisations. However, aggregation of different land uses within groups may result in uniform parking rates being applied across land uses with different transport patterns and mode shift potentials. To avoid parking requirements that are unnecessarily onerous or costly, this suggests either disaggregating land uses into a larger set of groups, or basing parking minima for each group on the activities requiring the least parking.

Proposal 3, updated car parking rates:

- Car parking maxima should be included in all PTAL categories, to reduce excess car parking construction.
- Walking accessibility levels and Cycling accessibility levels (combined into Active Transport ATAL levels) should be included in the calculations for car parking minima as they have a bearing on the demand for parking, including in Low and Poor PTAL areas, particularly in residential areas and the commercial, educational and industrial areas adjacent to them. Only in areas with both Poor PTAL *and* Poor ATAL might it be acceptable to assume and cater for a high car mode share.
- The visitor parking rates for bars, restaurants and other licenced venues should be lower than other uses in that category, given the lower driving rate and corresponding higher rates of PT, taxis and rideshare use for a given level of PT and/or active transport.

- Given the desirability⁹ and possibility¹⁰ of future PTAL improvements at a location over a building or facility's lifespan, parking minima should not be overly prescriptive or onerous. Recognising the significant costs of parking over-provision alluded to above and in the discussion paper, along with the embodied energy and long life of built assets, parking minima should therefore err on the side of lower provision. Greater certainty over future changes in PTAL would be provided by strong integration of land use and public transport planning and delivery, and a clearly articulated metropolitan-scale integrated transport plan.
- Shared parking facilities offer the potential for sufficient parking supply at required times with lower overall space requirements. Parking requirements should allow for the same spaces to be used by different land uses at different times, resulting in lower overall car parking rates at the location.¹¹ This would be aided by some flexibility in the location of parking associated with a site, and a streamlined process for reducing site-specific parking requirements under a precinct parking plan or Parking Overlay.

Proposal 4, Bicycle Parking and End of Trip facilities:

- The PTUA supports cycling as a means of connecting PT and origins and destinations further away from good PT, as well as for general sustainable transport. As a general point, bicycle parking rates should be ambitious in line with the mode shift required to meet Victoria's emissions reduction targets.¹² Bicycle parking provision should not be based upon low cycling mode share that has manifested from excessive car parking provision and minimal or absent cycling facilities, such as the starting point in existing Austroads guidance.
- Employee bicycle parking facilities should allow for some cargo and electric bicycles.
- Cycling has the potential to increase the catchment area of public transport,¹³ so low PTAL should not, of itself, result in low bicycle facility

⁹ Melanie Lowe *et al*, 'Liveability aspirations and realities: Implementation of urban policies designed to create healthy cities in Australia', *Social Science & Medicine*, 2020, <https://www.sciencedirect.com/science/article/abs/pii/S0277953619307087>

¹⁰ *Outcomes: What Plan Melbourne means for you*, <https://www.planning.vic.gov.au/guides-and-resources/strategies-and-initiatives/plan-melbourne/outcomes>

¹¹ Victoria Transport Policy Institute, *Shared Parking*, 2015, <https://www.vtpi.org/tdm/tdm89.htm>

¹² Climate Council, *Shifting Gear: The Path to Cleaner Transport*, 2023, <https://www.climatecouncil.org.au/resources/shifting-gear-the-path-to-cleaner-transport/>

¹³ Bradley J. Flamm & Charles R. Rivasplata, 'Public Transit Catchment Areas: The Curious Case of Cycle-Transit Users', *Transportation Research Record: Journal of the Transportation Research Board*, 2014, <https://journals.sagepub.com/doi/abs/10.3141/2419-10>

requirements. Similarly, in areas of poor PT provision cycling may act as a substitute for PT for people who are unable or chose not to drive. On this basis, low PTAL may be indicative of a higher need for cycling provision, rather than a lower need.

- As many low PTAL areas have potential to be reasonable cycling areas, Cycling accessibility, as part of ATAL, should be included in the calculation for bicycle parking requirements.
- The proposed bicycle parking requirements in low PTAL but reasonable ATAL areas seem low.
- Funeral Parlours should not be exempt from bicycle parking requirements, even if it is at lower rates.

Proposal 5, consolidated parking and EoT facilities provision in the VPP:

- The consolidation of car parking and bicycle facilities requirements into a single provision appears to simplify the VPP and is supported on that basis.
- Further to our remarks regarding shared parking facilities under Proposal 3 above, we recommend that the requirement for a permit for provision of some or all parking on another site be waived when undertaken in accordance with a precinct parking plan or Parking Overlay.
- The PTUA notes that variations to car parking design standards have the potential to increase the amount of scarce urban land required for cars (Figure 1), and to increase the costs of parking provision borne by home buyers, tenants, businesses and consumers.¹⁴ This is in addition to the harmful impacts on pedestrian safety and transport emissions from increasing vehicle size and weight.¹⁵

¹⁴ Shoup. op. cit.

¹⁵ Jo Lauder, 'Australia's love of big cars is undoing the benefits of the shift to EVs', ABC News, 2023, <https://www.abc.net.au/news/2023-07-15/big-cars-on-aussie-roads/102603092>