



5 May 2015

Carolyn McNally  
Secretary  
Department of Planning and Environment  
22-33 Bridge Street  
SYDNEY NSW 2000

**By Email:** [carolyn.mcnally@planning.nsw.gov.au](mailto:carolyn.mcnally@planning.nsw.gov.au)

Dear Carolyn,

### **Car Parking Requirements Under the SEPP (Housing for Seniors or People with a Disability) 2004**

The Urban Development Institute of Australia (NSW) (“UDIA NSW”) is the leading industry body representing the interests of the urban development sector, with more than 500 member companies spanning all facets of the industry. More than 150 members have direct input to policy through UDIA NSW Policy Committees. UDIA NSW advocates for better planning; timely and affordable housing, and the building of vibrant communities to increase local job opportunities.

The purpose of this submission is to draw the attention of Government to the way in which parking requirements are being applied for the SEPP (Housing for Seniors or People with a Disability). The result of the blanket application of AS 2890 in 2009 has been an increase in the cost of group parking in this type of development, impacting those who are least able to afford this price impost.

This submission recommends that the Australian Standard is applied to an appropriate percentage of parking spaces in all developments, constructed to more generous, over-sized dimensions to meet the particular needs of what is still a minority of residents.

### **The SEPP**

The State Environmental Planning Policy (SEPP) (Housing for Seniors or People with a Disability) 2004 (the SEPP) replaced the former SEPP5 (Seniors Living).

The SEPP aims to ensure a good supply and well-designed, diverse housing for seniors or people with a disability, making efficient use of existing infrastructure and services. It sets standards for these kinds of developments to ensure a good quality product is delivered. However this submission offers evidence that the blanket application of over-sized parking standards is having an unintended result, adding cost and complexity.

The submission draws attention to the required provision of all parking spaces in these developments to adhere to a revised AS 2890, when flexibility could be applied to better serve the mobility needs of residents and keep costs down.

In general, the SEPP works well to encourage high-quality living accommodation for the target group, however, the real car parking needs of seniors living in self-contained dwellings or could be better addressed within the SEPP.

### **General Comments on Car Parking for Seniors**

Older people living in self-contained dwellings or hostels have a level of mobility and independence that enables them to look after themselves. This is recognised in the SEPP, as evidenced by the provision of private or shared facilities to undertake basic activities such as cooking and washing.

**Urban Development  
Institute of Australia  
NEW SOUTH WALES**

PO Box Q402,  
QVB Post Office NSW 1230  
Suite 2, Level 11, 66 King Street  
Sydney NSW 2000  
**e** [udia@udia-nsw.com.au](mailto:udia@udia-nsw.com.au)  
**t** 02 9262 1214  
**w** [www.udia-nsw.com.au](http://www.udia-nsw.com.au)  
**abn** 43 001 172 363

Levels of mobility and physical ability may be categorised as:

- needing no assistance/ fully able;
- needing some assistance using walking aids (e.g. as walking frames or canes), or
- requiring a wheelchair.

The experience of a number of providers of accommodation for seniors indicates that walking aids are a more widely used form of mobility assistance than wheelchairs, (Table attached)

It is only since AS 2890.6 was applied to the SEPP in 2009, including for the first time within it a section specifically relating to disabled access, that the issue has arisen. The application to all parking spaces provided means that all must be over-sized, adding unnecessary cost and complexity.

### **Car Parking Requirements in the SEPP**

The standard of car parking to be provided for hostels and self-contained dwellings is set out in the SEPP.

Schedule 3, Part 1 Section 5 as follows:

- (a) Car parking spaces must comply with the requirements for parking for persons with a disability as set out in AS2890; and
- (b) 5% of the total number of car parking spaces (or at least 1 space if there are fewer than 20spaces) must be designed to enable the width of the spaces to be increased to 3.8m; and
- (c) Any garage must have a power-operated door....

Therefore, 95% of all car parking spaces are to meet the dimensions for disability parking as set out in the Australian Standard. These dimensions (per AS2890 Part 6) are identified as:

- Angle parking (including 90° angle): 2.4m x 5.4m dedicated space + 2.4m x 5.4m shared zoned alongside.

- Parallel Parking: 3.2m x 7.8m dedicated space + 1.6m x 7.8m shared area alongside.  
.....

In comparison, a standard car parking space has the dimensions of 2.3m wide and 4.5m long.

### **Key Issues**

- The SEPP in calling up AS 2890, currently requires 95% of car parking spaces to be disabled compliant, to accommodate a wheelchair:
  - However, only a small proportion of residents with cars require a wheelchair. These may be loaded from the side or – more commonly – from the rear of the vehicle.
  - More prevalent is the use of walking aids. These aids do not have the same requirement for access (e.g. shared areas) as wheelchairs.
  - Additional width to a standard car parking space provides the access support required for the use of walking aids.
- That self-contained dwellings which have allocated car parking are required to provide for all levels of mobility of present and future residents.

- The disabled compliant car parking spaces, comprising the dedicated car park space and the shared space, have a considerably larger area than a standard parking space:
  - As a result, a much larger floor area is required for car parking associated with seniors housing than standard housing.
  - This increased floor area has a cost implication to the overall project, and thus the cost of each unit.

## Recommendations

It is proposed that the SEPP Schedule 3 be amended thus:

- In Part 1 Section 5:
  - 5% of the total car parking spaces are to be compliant with the requirements of AS2890.
  - The remainder of car parking spaces have a minimum dimension of 3.2m x 5.4m.
- In Part 2 (Additional Standards for Self Contained Dwellings) addition of a new clause that car parking be compliant with the requirements of AS2890.

The above amendments would:

- Provide an appropriate level of car parking for persons using a wheelchair; and
- Enable the (side) access requirements for persons using a walking aid; and,
- Meet the current and future mobility needs of all residents of self-contained dwellings; and,
- Control the cost of constructing such accommodation.

Should you wish to discuss this matter further please contact Justin Drew, General Manager, Policy and Strategy, on 02 9262 1214 or [jdrew@udia-nsw.com.au](mailto:jdrew@udia-nsw.com.au) in this regard.

Yours sincerely



Stephen Albin  
**Chief Executive**