



**CONSERVATION
COUNCIL** ACT REGION

Submission to EPSDD: DV357

End-of-trip facilities general code

October 2021

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, the changes we need will only happen with the collective support of our community.

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Introduction

The Conservation Council ACT Region appreciates the opportunity to provide feedback on Draft Variation 357 End-of-trip facilities general code.¹

Canberrans traverse the city daily for social, recreational, household and employment activities. Transport emissions contribute 60% to the ACT's direct greenhouse emissions, primarily through the use of petrol and diesel vehicles. Our transport choices have a significant impact on our environment, the liveability of our city, and our productivity, health and wellbeing. We need to build a strong public transport network and enable active transport as a viable and attractive option for commuters, reduce emissions from use of cars, and transition to an electrified transport system, which can run on 100% renewable energy.

The 2021 ACT Budget commits millions of dollars to road infrastructure and measures to encourage a transition from petrol internal combustion engine vehicles (ICEV) to electric cars. While Australia needs to get ICEVs off the nation's roads to reduce emissions from road transport, there are many more benefits to be gained for individuals, cities and the environment by shifting car drivers onto public and active transport rather than a 1-for-1 "upgrade" into electric vehicles. Switching car travel to active travel is one of the most effective ways for individuals to reduce their carbon footprint, save on car running costs and improve their health and wellbeing.² In addition, reducing the number of cars used by the population will deliver reduced congestion and improve livability of our cities as density increases, and has the potential to free up public space for uses that are more beneficial to the community's well being.³

While the Conservation Council supports the purpose of DV357, greater ambition is needed to drive a significant shift from Canberra's car culture to one of active travel, particularly for regular commuting to places of work or education. Although Canberra has a high rate of cycling participation (broadly defined for all purposes) compared to other Australian states,⁴ participation declined across the country between 2011 and 2017. Despite the recent reversal of this trend due to people purchasing bikes for recreation during Covid lockdowns, only about 11% of Canberrans who cycled during the month of a 2021 survey did so to commute to places of work or education (as opposed to 80% who cycled for recreation or fitness).⁵

The Draft Variation's stated target of 7–10% participation in active travel seems like a modest level of ambition compared to leading European cities that have cycling rates of up to 60% on short trips.⁶ According to the ACT Government's Integrated Transport Strategy, Canberra has shorter than average capital city journeys at just 7.9km per trip⁷ – a distance easily cycled in around 20 minutes on good paths. The average work journey of 11.1km would also be quite

¹ ACT Government Environment, Planning and Sustainable Development Directorate, n.d., [DV357 End-of-trip facilities General Code](#).

² University of Oxford, 2021, [Get on your bike: Active transport makes a significant impact on carbon emissions](#)

³ Moss S, 2015, [End of the car age: how cities are outgrowing the automobile](#), The Guardian

⁴ Austroads, 2019, [Australian cycling participation: results of the 2019 national cycling participation survey](#)

⁵ Cycling and Walking Australia and New Zealand, 2021, [National walking and cycling participation survey 2021: Australian Capital Territory](#)

⁶ Buehler, R & Pucher, J, 2021, [Cycling for sustainable cities](#)

⁷ ACT Government, 2018, [Moving Canberra 2019–2045: Integrated transport strategy](#)

achievable for most people, particularly with electric bikes or combining push bikes with public transport and the availability of end-of-trip facilities. Given that 60–69% of cyclists say they would ride further or more often if they felt safer on roads,⁸ there is considerable potential to increase participation if barriers are proactively addressed. Evidence from cities in Europe, the UK and the US demonstrates that cycling participation can be dramatically and rapidly increased when ambitious policies are implemented, infrastructure adequately funded and the community broadly and deeply engaged.⁹

As well as the health and cost-saving benefits that accrue to individuals switching to cycling, the economic benefits are significant. Cycling directly contributed \$6.3 billion to the Australian economy in 2020.¹⁰ That contribution could increase by \$90 million annually if people who cycle monthly increase to fortnightly.

A unique opportunity exists in the ACT to disrupt previous norms of commuting due to:

- Covid lockdowns in 2020 and 2021
- the increasing popularity and availability of electric bicycles
- the construction of light rail in the ACT, and
- the recognition of the need to phase out ICEVs to achieve climate policy ambitions.

As many cities around the world are now doing¹¹, the ACT Government should capitalise on measures initiated during lockdowns, such as slower streets, to build momentum in changing the travel behaviours of commuters as they return to regular employment. The Government should move quickly to implement minimum standards for end-of-trip facilities and integrate the contributions from the Canberra community as a result of this consultation process. Deep community engagement on the code could include workshops for developers and major employers, and publication of a companion guide to explain the end-of-trip facilities code and demonstrate best practices.

In addition, the end-of-trip facilities code should be accompanied by legislated ambitious targets for active travel and a Ministerial Advisory Council on Transport to advise the government and monitor the implementation of an integrated transport strategy.

Other measures to support the uptake of active travel should include significantly increased expenditure on building and maintaining active travel infrastructure focused on safe, efficient and pleasant commuting, incentives to purchase and ride push bikes and e-bikes, more rigorous travel data collection (live sensors plus surveys and other sources), greater integration with public transport, and greater provision of cycle training.

Additional measures that could re-balance the transport environment in favour of active and public travel could include:¹²

- disincentives for private vehicle travel, such as redesign and repurposing of streets and carparks towards active travel and prioritisation of cycling connections,

⁸ We Ride Australia, 2021, [The Australian cycling economy 2021 report](#)

⁹ Buehler R & Pucher J, 2021, [Cycling for sustainable cities](#)

¹⁰ We Ride Australia, 2021, [The Australian cycling economy 2021 report](#)

¹¹ Perry F, 2020, [How cities are clamping down on cars](#), BBC Future Planet

¹² Smarter Cambridge Transport, 2016, [Reducing traffic congestion and pollution in urban areas](#)

- increased parking fees and car registration, road-use or congestion charges,
- extending lower speed zones, and
- urban planning that limits urban sprawl and locates services and employment within short distances of homes.

DV357

Government should lead by example

DV357 provides that the Code does “not apply to end-of-trip facilities provided on public land which are the responsibility of the ACT Government” because “some guidance on these facilities is provided in the Municipal Infrastructure Standards Part 5 - Active Travel”. However, that guidance is merely aspirational, refers only to major public transport stops, and does not set provision rates, stating only that “bicycle parking facilities should be provided at major light rail and bus stops including the provision of transport smart card operated bicycle lock-up cages at high volume stops and interchanges”.

It is inequitable for the code to apply to privately owned public transport facilities, but not to government owned facilities. Government must lead by example, applying the code to its own facilities as a minimum standard to provide for the thousands of Canberrans employed in public service, and consistent with the Government’s ‘Statement of Strategic Directions’ which seeks to “prioritise active travel”.

Variation should clarify responsibilities within type of development

The code “applies to all new developments, major alterations and/or extensions to existing buildings ... or changes that require approval of a Development Application”, and Table 1: Development required to comply with this code (p27 of consultation document) specifies 57 different types of development to which the code applies. Although this list includes many of the types of businesses that may occupy a mixed-use shopping centre or office building (for example: “department store”, “take-away food shop”, “non-retail commercial use”), the table does not include “shopping/retail centre” or “office building” or “retail/wholesale precinct”.

Advice provided to the Conservation Council by the Territory Plan Section (pers. comm, 26 Oct 2021) is that “for a large, new shopping centre which combines a range of uses, a shared end-of-use facility is required based on the GFA & provision rate requirements listed for those uses in the code”; and “for a development for one of the listed uses which is not incorporated into a larger shopping centre, such as a substantial expansion of a supermarket, the individual end of trip facility is required to be incorporated into that development.”

Perhaps this is a problem of terminology or requires reference to other legislation. The Conservation Council recommends that the code clarify the relative responsibilities of individual businesses/tenants within a shared shopping centre or office building or local shops precinct

compared to the centre developer/manager – are individual businesses required to provide their own facilities or is the centre required to provide shared facilities for use by all tenants? What is the trigger or threshold to differentiate between individual versus centre responsibilities?

Existing buildings need to be addressed

DV357 applies to “all new developments, major alterations and/or extensions to existing buildings (if the work affects more than 50% of the floor area of the whole of an existing building), or changes of use that require approval of a Development Application (DA) by the planning and land authority.” This will be good for those applicable future developments and renovations.

However, there are likely thousands of existing buildings around Canberra hosting tens of thousands of Canberra’s workforce that have inadequate or no end-of-trip facilities and no plans to renovate in the near future. This may include thousands of people employed in existing federal government department buildings.

Feedback from participants in the Conservation Council and Canberra Environment Centre’s Make the Move active travel project (funded by an ACT Government Community Zero Emissions Grant) indicates that the lack of end-of-trip facilities in existing commercial buildings and retail centres is a major obstacle to participation in cycle commuting by staff, particularly staff in retail outlets or small business tenants that may have very little space of their own to accommodate bikes and no capacity to add their own change rooms. This variation to the Territory Plan offers little hope of increased access to end-of-trip facilities for occupants of existing buildings.

The ACT Government must extend its consideration of this issue to existing buildings not currently covered by DV357. Government regulation, incentives and active engagement will be required to overcome the split incentive whereby building owners will bear the cost of supplying/upgrading end-of-trip facilities whereas the building tenants are perceived to accrue the benefits.

An alternative to requiring every building to retrofit end-of-trip facilities would be for the Government to build public/shared facilities in/near commercial/retail centres, perhaps funded through a levy on commercial leases. The Government could also install additional end-of-trip facilities in all publicly owned buildings and make them available to the occupants of neighbouring buildings.

Provision rates should accommodate future growth

The Conservation Council supports Pedal Power ACT’s recommendation to increase provision rates by at least 7% compared to the 2018 draft, commensurate with the recent increase in bike purchases through covid lockdowns, particularly e-bikes and other electric rideables which empower a wider range of people to cycle over commuter distances.

Additionally, the Conservation Council recommends that this code require developers to identify opportunities and future-proof current developments to allow for an expansion of end-of-trip facilities and bicycle parking as the uptake of cycling increases over time. For example, a major employer in the building may convert car parking spaces to end-of-trip facilities for a bicycle fleet.

Bicycle parking needs to accommodate variety

Bicycle parking supply and quality is a significant determinant of cycling for current and potential cyclists,¹³ and needs to accommodate the needs of a wide variety of cyclists such as parents trip-chaining with children on family logistics.

Given the rapid uptake of electric bikes and rideables, bicycle parking areas should include easily accessible powerpoints to allow for charging of batteries. Workshop space should be included to enable simple repairs and maintenance such as replacing flat tyres. Parking areas should have enough space and a variety of rails/racks to allow for manoeuvring and secure storage of cargo bikes, trailers, non-standard bicycles, scooters and other mobility rideables to support a greater diversity of people to adopt active travel. If building a vertical racking system, consideration needs to be given to ensuring priority access to suitable storage for people unable to lift a bicycle (like the wheelchair symbol for disabled parking – electric bikes, for instance, are quite heavy).

End-of-trip facilities must support broad participation

Rule 5.1 Shower and change facilities proposes that “shower and change facilities must be rounded up such that an equal number of male and female facilities are provided. Separate male and female shower and change facilities must be provided.” (R21)

End-of-trip facilities such as showers and change rooms are crucial to build participation, and as such need to be accessible to as many people as possible, addressing concerns about safety, privacy and gender identity.¹⁴ Whilst shared facilities may be more space-efficient, individual unisex facilities would provide privacy for those of all gender identities who prefer, for whatever reason, not to change in shared facilities.¹⁵

The Conservation Council recommends that the Government consult with the ACT Human Rights Commission and gender diversity advocates regarding best practice for inclusion, and suggests amending R21 so that a percentage of shower and change facilities are individual gender-neutral facilities and a minimum number of unisex facilities are provided wherever shower and change facilities are required by the code.

¹³ Heinen E & Buehler R, 2019, [Bicycle parking: a systematic review of scientific literature on parking behaviour, parking preferences, and their influence on cycling and travel behaviour](#), Transport Reviews vol 39, iss 5

¹⁴ Kulick A, Wernick L, Espinoza M, Newman T & Dessel A, 2020, [Three strikes and you're out: culture, facilities and participation among LGBTQ youth in sports](#), Society for Social Work and Research

¹⁵ ACT Human Rights Commission, 2019, [Supporting gender transition in the workplace: a toolkit for ACT employers](#), and 2018, [Everyone can play: guidelines for local clubs on best practice for inclusion of transgender and intersex participants](#)

Recommendations

- DV357 should apply to government facilities as well as privately owned developments
- Under “Application”, clarify the relative responsibilities of individual businesses/tenants within a shared shopping centre or office building or local shops precinct compared to the centre developer/manager
- Provision rates should include identifying opportunities for future expansion of cycling facilities beyond the currently required rate
- Bicycle parking should include charging points, maintenance space and room to securely accommodate a variety of rideables
- Showers and changing rooms need to enable equity of access to support higher participation rates.
- Separate to this Draft Variation, the ACT Government should develop a strategy to address provision of end-of-trip facilities in existing buildings
- The code must be accompanied by a suite of infrastructure and engagement measures including a guide for developers that demonstrates best practice in end-of-trip facilities