15 November 2018

State Planning Commission
PO Box 1815
ADELAIDE SA 5001

Via email: DPTI.PlanningEngagement@sa.gov.au

To whom it may concern

Integrated Movement Systems Policy Discussion Paper - submission

Thank you for providing the City of Port Adelaide Enfield with the opportunity to provide comments on the abovementioned paper. Following Council’s consideration of the paper at its meeting held on 6 November 2018, please find attached our submission.

As an overall comment, it is noted that the discussion paper focuses on high-level proposals, as opposed to explicit development policies. With regard to the latter, it is understood that the policies are under development, and will be released as part of the Planning and Design Code library during early 2019.

Thank you for the opportunity to provide a submission on the discussion paper. If you require further information or would like to discuss this matter, please contact Karen Cummings, City Development Manager on telephone [redacted].

Yours sincerely

Sarah Philpott
Director Corporate Services

Encl. City of Port Adelaide Enfield submission on the Integrated Movement Systems discussion paper
### Question
How can the Code better respond to the differences in public transport availability in urban and regional communities? (p. 25)

### Response
In the absence of additional public transport services, there may be two options, being: (1) increasing the number of dwellings within walking distance of public transport stops/interchanges, (2) increasing the number of free, all-day carparks at stops/interchanges, (3) increased public transport provision, and (4) facilities to encourage multi-modal transport e.g. bus/train interchanges, and bike cages at train stations. In practice however, these approaches will only increase availability for areas with existing public transport services.

At the same time, any Code responses may need to confront other broader challenges, such as:

- New housing estates that avoid the use of a "grid layout" for their street networks. Some estates tend to have non-grid layouts, with dead-ends or a large number of turns. It seems that non-grid layouts are often used to discourage 'rat runs' and commuter shortcuts through residential areas. While this technique can be effective for those purposes, it also compromises the ability of buses to effectively penetrate the street networks of residential areas. It should be noted that well-designed "non-grid" layouts can suit pedestrians and cyclists, provided that good off-road connections exist.

- The trend of new housing estates that are built with narrow street widths. This also makes bus travel (and waste collection) more difficult, a situation often compounded in streets that are dependent upon high rates of kerbside parking. While located outside of Port Adelaide Enfield, it is understood that some bus services in Greenwith must use mini-buses (rather than conventional buses), due to the design of roads in that locality.

- A lack of forward planning by State/Local Governments in providing carparking near bus stops. Where services have proven popular, the associated bus stops may be accompanied by all-day parking by commuters in local streets (which were never designed as overflow carparks). This results in complaints from nearby residents, sometimes compelling Councils to introduce parking restrictions for the affected streets. One such example is the residential street network in southern Klemzig (within a 10-minute walk of Klemzig Interchange). While such restrictions treat the symptoms of the problem, they also reduce the convenience of using public transport (especially for those with little choice but to drive to an interchange).
**Question** | **Response**
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What other policy provisions are needed to facilitate good quality development that supports the desired minimum residential densities in key zones? (p. 25) | Shopping centre managers’ reactions to commuter carparking at their centres. With larger shopping centres often served by several bus routes, some commuters drive to these shopping centres, and park in the centre’s carpark all day. In the past, this was often tolerated by centres, given a lower population, smaller floor areas of shopping centres, and spare carparking capacity. In recent years however, a steadily increasing population, larger centre floor areas, and an erosion of spare parking has led some centres introducing timed parking restrictions, boom gates, or charges for multi-hour parking. These reactions, while legal on private land, have reduced the accessibility and convenience of public transport for suburban residents.

State Government decisions to charge for carparking at purpose-built, multistorey park ‘n’ ride carparks (e.g. Tea Tree Plaza). In some cases, this has incentivised motorists to seek free spaces in surrounding streets - even if further away from the desired bus stop - somewhat defeating the purpose of a park ‘n’ ride carpark.

Better pedestrian and cyclist facilities provided to and from transport interchanges to encourage walking and cycling (e.g. wayfinding and continuous, accessible footpaths)

An apparent reluctance of successive State Governments to build dedicated, free carparks at new train stations (e.g. the Port Dock Railway Station in Port Adelaide).

Based on the above points, if additional public transport services cannot be funded, one alternative is to enable motorists to drive to public transport stops/interchanges that provide free, all-day parking. Another option is to provide better connections for pedestrians and cyclists to encourage people to walk short distances (rather than drive).

Further consideration could also be given to (1) consciously designing/planning for walkable and bike-friendly neighbourhoods, and (2) considering what the Code can do to integrate walking and cycling networks with the public transport network.

Good quality development (at increased densities) must have regard to the conventional design aspects of allotment widths, setbacks, overshadowing, building heights, roof forms, materials, and solid-to-void ratios. It is assumed that the forthcoming *Design in the Planning System* discussion paper will consider these matters in detail.

Having said this, new housing estates will often control such matters through encumbrances.
Question

Does existing policy within the SAPPL [SA Planning Policy Library] adequately address issues relating to the perceived quality and impacts of higher density development? For example, the integration and cumulative impacts of parking and vehicle movement, public realm, and streetscape interface). How might targeted policy reform promote or incentivise better outcomes? (p. 25)

Response

Therefore, the larger issue is the contemporary style of infill development in established areas (where encumbrances may have never existed). In this situation, a single house (on a wide allotment) is demolished, and two (or more) new dwellings (on narrow allotments) are often constructed in its place. This style of infill development tends to occur in an ad-hoc, isolated, unpredictable, indiscriminate, and uncoordinated manner - a point raised in Council's submission on the Ministerial Kilburn and Blair Athol Urban Renewal DPA from 2017.

Some residents have criticised this approach to infill development, especially with regard to established residential character. This criticism suggests that current Development Plans have been unsuccessful in addressing the design matters that are often valued by existing residents.

Against this backdrop, it seems that the Code has an opportunity to better guide the current-day approaches to suburban infill development. If executed well, it should help achieve the multiple goals of increased densities, sensitive urban renewal, and more households located within a short distance of public transport services. If executed poorly, it may result in streets with fewer trees, minimal verges, significant amounts of on-street parking, and a poorer urban form characterised by driveways and garage doors.

In some respects, the SAPPL is not well equipped to address the cumulative impacts of development in a given area. This reflects a historical weakness of the South Australian planning system, whereby assessment officers are expected to assess individual developments in isolation, against the current Development Plan. If the Development Plan makes no reference to cumulative developments, it is difficult for officers to address it otherwise. This mindset is sometimes reflected in the writing of individual development policies, which are often phrased in terms of individual development applications (at a point in time). These policy and assessment processes are mutually reinforcing to an extent - and sometimes reinforced through court precedent.

Returning to the SAPPL, it has encouraged the use of Desired Character statements for several years. However, the technical quality of existing statements (within and between Development Plans) seems to be uneven. It is understood that Desired Character statements will have a future equivalent in the Code, but the finer details of this are not currently known to the Council.

With regard to existing Desired Character statements, residential densities, qualitative statements are often pitted against (numerical) Principles of Development Control. When negotiating with developers and consultants, numerical provisions in Development Plans will
Question | Response
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How should planning policy balance the need for airports in strategic locations against the impact of these facilities on adjacent land owners? (p. 26) | To address the causes of these land use conflicts, two possible approaches are for (1) airport curfews, or (2) additional building treatments for nearby homes, including roof insulation or double glazing. The latter could be incorporated into a Noise and Air Emissions Overlay, which triggers additional building treatments under the National Construction Code.

Integrated Movement Systems - Policy Discussion Paper


**Integrated Movement Systems - Policy Discussion Paper**

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| How can the Code work to protect the operation of major transport facilities whilst managing the impacts on adjacent development opportunities? (p. 27) | However, as many airports are governed by Commonwealth legislation, it may be difficult to achieve the balance sought by the discussion paper. In practice, the supremacy of Commonwealth legislation suggests that state planning regimes will need to concentrate on a narrower range of matters, such as design/construction techniques. There is also the broader question of existing properties that are already affected by aircraft noise emissions. If planning policy can only be invoked against new development applications, it seems that noise attenuation treatments cannot be applied to existing houses (through the planning system).

Additionally, this question's narrow reference to adjacent land may need reconsideration. While the operational reality of established airports in Greater Adelaide is acknowledged, it is well known that noise impacts are not limited to merely the "adjacent land owners" to a given airport.³

Although not explicitly mentioned in the discussion question, the preceding policy proposal of "Review the range of zones and policy areas that apply to seaports and supporting infrastructure to ensure that policy is fit for purpose" is supported, given the extensive seaport infrastructure that exists on the Lefevre Peninsula.

From a spatial point of view, it may be worth exploring the inclusion of Concept Plans (or their future equivalent) for all major transport facilities. Such plans could include references to noise attenuation treatments, separation distances, and the like. Where a development requires licensing under the Environment Protection Act 1993 (on noise grounds), there may be scope for consistent noise criteria for such development (and sensitive receptors located nearby).

Airports can have other (indirect) impacts too e.g. jet fuel being transported through residential areas (i.e. the freight route from fuel terminals on the Lefevre Peninsula to Adelaide Airport). Concept Plans need to consider the impacts of deliveries/other operational aspects of these facilities e.g. by providing safe delivery and public transport routes in consideration to adjacent land uses.

How can planning policy better manage and minimise the impacts of transport corridors on recent development? (p. 27) | As above, physical noise attenuation can go some way to dealing with noise issues, having recently been used along South Road for instance.

³ Per Section 79 of the Airports Act 1996, Parafield Airport Ltd was required to consult with all neighbouring Councils (i.e. adjacent to the City of Salisbury) when consulting on a revised masterplan for the airport in 2017. The City of Port Adelaide Enfield participated in the consultation process.

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<td>surrounding development (i.e. noise and air pollution for residents)? (p. 27)</td>
<td>Along the Lefevre Peninsula, a number of dwellings are located within 100 metres of the Outer Harbor rail freight line. For large stretches of this line, no noise attenuation treatments have been provided. As such, some houses have a direct line of sight to the freight line, which can generate freight noise (and ground vibration) at any time of the day. This has led to numerous complaints from residents, with noise emissions considered in the State Parliamentary inquiry for Land Uses on Lefevre Peninsula in 2015. In this context, there seems an opportunity for planning policy to lend more guidance for noise/vibration attenuation.</td>
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<td>Other types of pollution however (i.e. air pollution) may be more difficult to address through the planning system. With regard to major transport corridors, these accommodate large numbers of truck movements. These vehicles tend to emit high levels of particulate matter (including ultrafine particles smaller than PM2.5), which are known to affect respiratory health.</td>
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<td>The airborne concentration of particulate matter depends on the distance between the transport corridors and its surrounding developments. In general, concentration levels:</td>
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<td>• Are deemed as high within 50 metres of a major transport corridor;</td>
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<td>• Drop off rapidly between 50-100 metres of a major transport corridor; and</td>
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<td>• Revert to background levels at a distance of 100-300 metres.</td>
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<td>Across Greater Adelaide, there may be hundreds or thousands of houses already built within 50 metres of major transport routes. Additionally, several Ministerial Development Plan Amendments (in recent years) have promoted increased residential development along selected main roads. This policy approach could result in higher numbers of people that are exposed to high concentrations of particulate matter.</td>
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<td>While the Code has the theoretical ability to prevent this in the future, a prohibition of new residential development (within 50 metres of major transport routes) would be a paradigm shift in the state’s planning system.</td>
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## Question

How can planning policy better enable the delivery of more walking, cycling and active travel opportunities in our neighbourhoods? (p. 28)

### Response

The other impact on residents is neighbourhood access and severance. Major road and rail projects can cut residents off from the closest schools and shops as they often create a barrier that makes access difficult. If planning policy can encourage the provision of pedestrian separation/connections/signals, this will result in better outcomes for local communities.

There may be benefits in ensuring the provision of pram ramps at every street corner, the proactive maintenance of old footpaths, and the increased provision of park benches (for example). This is a situation where design principles in the 'Streets for People Compendium' can be applied.

With regard to public transport, a requirement for shelters at bus stops where appropriate (with night-time lighting) could make for a more welcoming user experience. More frequent services and real-time information for passengers could also further this sentiment.

With regard to cycling, planning policy can encourage land divisions that accommodate bike lanes where appropriate (noting that some existing streets are too narrow to accommodate them). From a policy viewpoint, existing Development Plans tend to be conscious of bicycle parking (especially for places of business), but it is unclear whether end-of-trip facilities (e.g. showers and lockers) are pursued at the same level.

In practice however, some of the above matters may not meet the legal definition of 'development' and may therefore be difficult to enforce through planning policy.

How can planning policy assist in balancing the tensions between prioritising the movement of vehicles (Link) and the quality of the space for pedestrians (Place) along our streets? (p. 28)

### Desired Character statements (or their future equivalent, which are understood to be Desired Outcomes statements) could encourage:

- Wider verges and footpaths
- More street trees (to provide shade for pedestrians)
- More park benches (at bus stops, parks, or verges)
- Footpaths on both sides of the street where appropriate (in residential and commercial areas, as a minimum)
- Improvements to public lighting
- Rear laneway access for medium/high density developments.

There could be opportunities to integrate these suggestions with the 'Streets for People' design principles.
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<td>How can the Code promote development that contributes positively to streets and the serviceability and quality of the public realm? (p. 28)</td>
<td>In saying this, some of the above may not meet the legal definition of development. There is an opportunity for the Code to promote the better use of landscaping. Anecdotally, while new developments often include landscaping, it is not always maintained over time (and its maintenance is not always enforced by relevant authorities). There is also a practical question of whether a Council would issue legal proceedings against landowners (where the main development is acceptable, but the sole issue is the state of the condition of its landscaping). Opportunities may also exist for the prevention of residential frontages that are dominated by double garages. One way of achieving this is to discourage the creation of narrow residential allotments. Increased front setbacks can also allow for vegetation that offsets the physical dominance of concrete and garaging upon the public realm. Driveways should be paired to minimise impacts on the street.</td>
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<td>Does the Code need to more explicitly anticipate the needs of an ageing population through provision for things like mobility scooters or access vehicles? (p. 28)</td>
<td>In principle, an anticipation of people's needs is supported, but it is unclear whether other legislative tools (such as the Australian Road Rules) may have a stronger role to play. In the context of shops or community facilities, consideration could be given to dedicated parking bays for scooters, or other vehicles less powerful than a motorbike.</td>
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<td>How can the Code best respond to the variances in car parking requirements for different neighbourhoods? (p. 29)</td>
<td>This could be done by identifying the areas in question, with teamwork from local Councils. The relevant areas could be depicted on an overlay, and tailored rates determined - assuming that the tailored rates are agreed to by Councils.</td>
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<td>Will the current approach of minimum car-parking rates, with potential for discounted provision, adequately support the desired shift toward more sustainable mobility? Should the Code provide greater opportunity for low or no parking in appropriate circumstances or contemplate maximum parking rates? (p. 29)</td>
<td>The current approach (in specifying minimum car-parking rates) is considered optimal - provided that Councils set the parking rates for their local areas. Without a clear definition of &quot;appropriate circumstances&quot; (e.g. frequency of public transport), proposals for reduced parking rates (or none at all) are not supported. If reduced parking is warranted in a given location, the preferred approach is through negotiation at the development assessment stage (as happens already). There may also be benefits in reviewing the experiences of all car-parking funds in the state.</td>
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| Are there any other key opportunities and challenges that you think the Code should respond to? (p. 30) | In the context of integrated movement systems, other opportunities and challenges include:  
- A consideration of all Australian Standards cited in existing Development Plans, and which should be reflected in the P&D Code (for statewide adoption) |
### Integrated Movement Systems - Policy Discussion Paper

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<td>The legal appropriateness of 'Interpretation' headings in the existing</td>
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<td>SAPPL modules for the <em>Noise and Air Emissions</em>, and the *Strategic</td>
<td>• The accuracy of mapping pertaining to <em>Airport Building Heights</em> overlays</td>
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<td>Transport Routes* overlays</td>
<td>• The interplay between <em>Strategic Transport Routes</em> (in Development Plans) and controlled-access roads (declared under the <em>Highways Act 1926</em>)</td>
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<td>• The interplay between <em>Strategic Transport Routes</em>, public transport corridors, and the appropriateness of increased development.</td>
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<td>• The depiction of roads subject to the Metropolitan Adelaide Road Widening Plan</td>
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<td>• The zoning of airport land that is owned by the Commonwealth</td>
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<td>• Encouraging all new road intersections (and driveways) to be constructed at right angles to the adjoining street</td>
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<td>• Clearer encouragement of walking and cycling trails (especially for greenfield developments)</td>
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<td>• Stronger requirements for paired driveways (in the context of infill development), thereby preserving existing on-street parking spaces where physically possible</td>
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<td>• A tighter link between any EPA guidelines (for vehicular/freight noise) and the Code</td>
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<td>• The advantages/disadvantages of <em>Road Hierarchy and Function</em> tables (e.g. Table PAdE/6 in the Port Adelaide Enfield Development Plan).</td>
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<td>• Addressing the perception that &quot;(managing) parking is a Council matter&quot;. This includes cases where State Government decisions have caused parking shortages, which Councils are often left to manage. One example is the State Government office at Nile Street, Port Adelaide, which provided some 150 carparks for up to 500 employees.</td>
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**Are there any other ideas for potential Code policy you would like to recommend? (p. 30)**

- Addressing the situation where front residential setbacks (especially for infill/medium density housing) are not long enough to accommodate increasingly larger utes, SUVs and 4-wheel drives parked in driveways. The status quo of designing around 885 vehicles may not necessarily be appropriate in today’s circumstances, and therefore design for 899 in medium/high density locations should be considered.
- New policy approaches to garbage collection in medium/high density developments e.g. shared waste collection, possibly by private contractors, to minimise the number of individual bins requiring kerbside collection.

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