22 November 2018

Alison Collins
Project Lead, Integrated Movement Systems Discussion Paper
Department of Planning, Transport and Infrastructure
GPO Box 1815
Adelaide SA 5001

BY EMAIL: DPTI.PlanningEngagement@sa.gov.au

Dear Ms Collins

Integrated Movement Systems Discussion Paper – City of Holdfast Bay Submission

Thank you for the opportunity to provide comments in response to the Integrated Movement Systems Discussion Paper.

This submission follows the request in the engagement brief to align the response to the following areas:

- Aligning South Australia’s growth with transport infrastructure.
- Capitalising on strategic transport infrastructure.
- Sustainable mobility, car parking and the impacts of technology.

Aligning South Australia’s growth with transport infrastructure

There is general support in the Discussion Paper’s proposition that Integrated Movement Systems (IMS) are designed to build on an area’s liveability, economic competitiveness and facilitate sustainable outcomes by:

- Delivering land use outcomes and transport systems that complement each other.
- Achieving optimal land use and development outcomes with regard to the role and function of all transport modes.
- Providing for an interface between land uses and transport corridors which improves the function of both.

However, achieving these outcomes requires a planning system that encourages and enables appropriate development in locations serviced by a variety of quality transport options and facilities supported by an ongoing commitment to transport investment.
Major movement corridors such as Brighton Road, Anzac Highway, Diagonal Road, Oaklands Road, Seacombe Road and Sturt Road traverse the City of Holdfast Bay. Each of these routes cater for a variety of roles and functions along their length. How the associated land use policy complements and influences these diverse environments must be a primary consideration to achieve a successful integrated movement system. The preparation of the Planning and Design Code needs to consider how these movement systems are integrated into planning policy. It will also need to reflect the policy direction contained within key government strategic documents, in particular the State Planning Policies (SPPs) and Regional Plans (refer to the separate submissions by the City of Holdfast Bay on these documents).

As intimated in the City of Holdfast Bay’s submission to the Draft State Planning Policies, it is imperative that planning for orderly, connected growth is a key measure to optimising existing infrastructure, which can then lead to supporting increased densities in well-serviced areas, whilst protecting the economic function of strategic transport routes. These themes are mentioned in the IMS Discussion Paper, but require further development for specific sections on arterial roads that transcend council borders and land use zone boundaries. Whilst the planning system plays an important role in the achievement of effective integration, it needs to work with other areas such as State Government’s Integrated Transport and Land Use Plan (ITLUP), council’s own local area transport plans, the private sector, and the funding arms of the Commonwealth Government.

The proposition that the prohibitive cost of constructing new mass transit networks warrants strategies that maximise the value of existing infrastructure networks is sound. However, this must be achieved in a way that does not compromise the creation of liveable and affordable communities. Simply developing policy to enable the development of land at higher densities close to existing transport corridors or on public transport routes, is counter-productive if liveability is compromised by the level of traffic and poor condition of the road or infrequency of public transport options. There must be a tandem effort to improve the condition of existing movement systems.

**Capitalising on strategic transport infrastructure**

There is a risk of a disconnect occurring between the Discussion Paper’s proposition that planning policies should protect major transport corridors from incompatible development to ensure their ongoing, uninterrupted and efficient operation, and the potentially irreconcilable policy to maximise the value of existing infrastructure through an increase to population density along such routes. Both propositions are not necessarily mutually exclusive, but a great deal of care is required to ensure that the Design Code transitions the policy intent of current zones that promote improved integration of land use along Brighton Road and Anzac Highway or more specifically, the land held within Residential Zone - Medium Density Policy Area 5 along each route.

**Sustainable mobility, car parking and the impacts of technology**

The Draft State Planning Policies contain policies that promote walking and cycling to ensure travel mode shift and improve community health outcomes. These need to resonate through policies in the IMS to ensure that provision is made for more people to adopt cycling, walking and other non-motorised transport for commuting and other transport purposes (as distinct from purely recreational reasons). ‘Active travel’ to destinations of work, business and education must be acknowledged as an emerging alternative, particularly for residents in higher density.
accommodation. As such, travelling as a cyclist or pedestrian must be accommodated in any strategy, and therefore transport options must be viewed as viable alternatives for commuters.

Aside from the structured topics in the Discussion Paper it is also worthwhile reflecting on the outcomes of the Metropolitan Adelaide Car Parking Summit held in April 2018, where some of the most commonly reported issues require consideration as part of a broader IMS. In particular, the increase in urban infill leading to additional demand for car parking, including on-street parking (visitors and residents), which leads to excessive parking on local streets, creating problems for access and movement. In Glenelg, the potential for on-street parking overflow are impacted by attractions (beach, jetty, Moseley Square etc), which is further compounded by policies that allow greater residential densities.

Please contact me on [contact information] should you wish to discuss the submission further.

Yours faithfully

Anthony Marroncelli
Manager Development Services