25 November 2018

State Planning Commission
PO BOX 1815
ADELAIDE SA 5001

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

To whom it may concern,

RE: Response to Integrated Movement Systems Policy Discussion Paper

Thank you for the opportunity to provide a submission on the Integrated Movement Systems Policy Discussion Paper (the Paper). Please find attached a copy of the City of West Torrens submission including general feedback and responses to questions raised directly in the Paper.

Please note, Council Administration has been unable to consult with Elected Members within the submission timeline due to the consultation deadline coinciding with Council Election Caretaker mode and Elected Member's inductions. Therefore this is an Administration response.

In light of this, the Administration seeks to provide feedback to DPTI to exercise careful consideration of timing for future consultations of this nature regarding policies of considerable significance, to ensure appropriate input can be provided from Council's Elected Representatives.

Notwithstanding the above, Council Administration welcomes the opportunity to provide comment and understandably, has a keen interest in the themes contained within the discussion paper:

1. Aligning South Australia's growth with transport infrastructure,
2. Capitalising on strategic transport infrastructure, and
3. Sustainable mobility, car parking and the impact of technology.

In reviewing the Paper there is an apparent gap in discussion about strategic transport facilities, which is an area of interest for the City of West Torrens, given the location of the Adelaide Airport, Adelaide Parklands Interstate Train Terminal, freight routes, bikeways and linear tracks which all feature in a combination unique to the City of West Torrens.
Council Administration has been keen to provide input into the Planning & Design Code, and has been seeking greater collaboration from the State and Federal Government on a cohesive policy approach to development near airfields to ensure improved outcomes for residents, businesses and land owners in proximity to Adelaide Airport.

Matters of particular importance relating to the airport include achieving a balance between existing development and proposed development that might conflict due to aircraft noise and aviation safety, and, incorporating relevant Federal Government policy guidelines and best practice (i.e. National Airports Safeguarding Framework Guidelines.)

Should you require further information or would like to discuss this submission, please contact Rebecca Perkin, Team Leader Strategy on [redacted].

Yours sincerely

[Signature]

Terry Buss PSM
Chief Executive Officer
City of West Torrens

Att:

Integrated Movement Systems Policy Discussion Paper Submission
Council Administration General Overview Comments

The Integrated Movement Systems Policy Discussion Paper centres around three themes (below), and presents a number of discussion questions (answered on the following pages):

1. Aligning South Australia’s growth with transport infrastructure,
2. Capitalising on strategic transport infrastructure, and
3. Sustainable mobility, car parking and the impact of technology.

It can be difficult to reconcile the competing interests, priorities and tensions of a varied population. The planning reform provides an opportunity to embed a greater understanding and best practice of mobility, movement, environment and emerging technologies into the planning system with the benefit of hindsight.

Land is a finite resource and open space is under pressure to perform more functions. Roadways are a large portion of a city’s open space and the planning reform presents a real opportunity to challenge the status quo and imagine a more sustainable and accessible urban form.

It is considered problematic that the discussion paper uses the terms ‘transport’ and ‘mobility’ interchangeably, as the two terms have separate distinct and potentially conflicting meanings. Whilst, the discussion paper provides a basis for what could be, there is an implicit hierarchy that puts the priority on efficient vehicular movement over that of mobility and a genuine interest to innovate and improve the capacity to create a movement system for all users. This type of innovation requires greater resourcing, political will, and an active change management program.

The discussion paper needs to consider political will to actively shift car dependency, further augment known levers to increase alternate forms of travel, and to provide further consideration to capitalising on existing transport infrastructure. Notably, heavy rail is absent from the discussion paper.

**THEME 1: Aligning South Australia’s growth with transport infrastructure**

How can the Code better respond to the differences in public transport availability in urban and regional communities?

- Government investment in transport infrastructure should drive land use planning (not the other way round). Rural areas are badly serviced by public transport availability due to population densities and the (historical) decline in service provision.
- In an increasingly carbon-constrained future, the need for inter-urban-rural transport capacity may then need to be met by modes other than those provided by internal combustion of fossil fuels. While freight infrastructure may be a driver of this, moving people without incurring a carbon debt will still need a significant re-think in transport service provision.
- Provide a mix of transport types that feed into each other’s routes and timetables, whether this be in urban or in regional areas- a truly integrated system!
What other policy provisions are needed to facilitate good quality development that supports the desired minimum residential densities in key zones?

- **Policy** needs to direct investment away from private car use and towards active transport (cycling and walking), inter-modal exchange (to public transport). This will require investment levers (incentives and disincentives) as well as key behavioural change associated with built form outcomes that seeks to build community attraction to place, and not prioritise car movement and parking.
- This point is also a consideration in reconfiguring car space for other uses, such as water collection and infiltration, to allow the growth of tree canopy and green infrastructure to ameliorate the impact of extreme heat conditions on the density of population proposed adjacent to transport corridors or simply additional open space.
- Good quality development needs to provide greater setback distances to allow space for streetscape greening and shared pathways.
- Consideration needs to be given to maximum car parking allowances that have an in-built mechanism to be reduced over time, or to recognise that the development will likely have a retrofit applied at a future point to re-configure what was initially car-parking to another use.
- **Policy** provisions need to provide for improved amenity and activation at the street level to encourage walking/walkability.

Does existing policy within the SAPPL 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?

- **Policy** both in the Code and within SAPPL should be calibrated in a way that requires developers to provide public realm benefits in cases where developers propose site areas, frontages, site coverage etc. that exceed stated policy. A rationale based on the idea that when development seeks to ‘take’ a little more than the Code prescribes, it should ‘give’ a little more to the community via public realm benefits should be built into the Code as a means of enabling better design solutions both on and off site.
- Policy needs to better address the need for improved greening of transport movement corridors, particularly in areas of higher density development. This requires greater investment in streetscapes and more state funding to councils.
- More consideration needs to be given to extreme heat conditions and how the public realm green infrastructure could ‘layer’ several functions to achieve ecological and resiliency outcomes – especially in the face of a changing climate and heatwave conditions. As an example – local streets would be narrowed with strategic ‘squeeze points’ to slow the speed of traffic (thus providing traffic calming and noise reduction). These points have a designed WSUD treatment encouraging stormwater infiltration. This in turn supports the growth of tree canopy targets associated with cooling the environment through shade and evapotranspiration. The outcome is a cooler street, a safer and more pleasant environment for cycling and walking, and a cooling of the local street, decreasing heat island impacts, therefore reducing the air-conditioning load on the adjacent buildings.
Better outcomes could be achieved through: Incentives and regulations (that are enforceable) to improve built form outcomes are required (the National Construction Code only sets minimal performance standards that are inadequate for addressing extreme heat impacts / heatwave conditions – especially if there are electricity grid outages – as these buildings need air-conditioning to maintain a comfortable temperature).

A layer of master planning (particularly for Urban Corridor Zones) or facilitated allotment amalgamations could assist. It is unrealistic to expect case by case development on fragmented sites to result in cohesive outcomes.

THEME 2: Capitalising on strategic transport infrastructure

2.1 Strategic Transport Facilities

How should planning policy balance the need for airports in strategic locations against the impact of these facilities on adjacent land owners?

Planning policy should not create ambiguity but provide clear guidance for the State in protecting key activities. ITLUP identifies the significance of Adelaide Airport and states that ensuring regulatory mechanisms provide the necessary protection for the operations of existing and future sites of national, state and regional strategic importance including working with Council planners to protect airports from inappropriate surrounding development. ITLUP identifies a number of solutions including improving access to Adelaide Airport e.g. intersections to maintain efficient freight access, access from Richmond Rd for commercial vehicles, taxis and buses, tram to airport through WestL/NK, airport bikeway and seeks to attract more international air services to Adelaide Airport.

The City of West Torrens has provided the following response to the Department of Infrastructure, Regional Development and Cities following the release of the Draft Guideline 1- Public Safety Zones (PSZ) at the End of Runways with particular regard to how might a PSZ might be implemented (note: Federal Government Guideline was agreed by Ministers at the Transport and Infrastructure Council on 9 November 2018):

"Council is of the view that the purpose of a shared national land use planning framework (NASF) agreed by Government in 2012 [through the National Airports Safeguarding Advisory Group (NASAG)] is to:

A. Minimise noise-sensitive developments near airports; and
B. Ensure aviation safety is recognized in land use planning decisions.

There are two identified options as to how public safety may be considered in planning frameworks which guide decisions on development near the end of airport runways.

1. Proactively identify Public Safety Zones by undertaking the sophisticated modelling and mapping the resulting areas with lines on maps.
2. Inserting a general clause such as the Victorian model, "consider NASF in decision-making", into the guiding principles of the Planning and Design Code and or relevant State Planning Policy, and assessing public safety risk on a case by case basis.

To achieve an open and transparent process the former option is preferred, especially given that the alternative option of addressing on a case by case basis is likely to be cost prohibitive to domestic residential development and may result in an inconsistent application of the principles.
Options for implementation include the Victorian model— which inserts the concept in the Planning process without any spatial mapping of affected areas. This means that NASF guidelines are applied on a case-by-case basis. This may present risks such as:

- Easy to miss
- Not open and transparent
- Cost prohibitive for domestic scale development to undertake the calculations

Benefits of spatially mapping the area:

- Open and Transparent
- Easily identified
- Calculation for an area can be combined and avoid double-handling

The best time to implement a PSZ which prevents inappropriate or sensitive development from establishing at the end of airport runways would be prior to any development being established.

Unfortunately, in the case of Adelaide Airport, the urban areas have already encroached upon the areas that are likely to be included in a PSZ.

The impact of the PSZ (assuming the Queensland model of application) affects a number of properties based on the measurement from the end of the (approx.) north-south runway. Adelaide Airport is growing and has an alternate runway which runs (approx.) East-West, as well as provision for a third runway. This further increases the impact that any proposed PSZ may have on potential for development (particularly residential development) in these parts of West Torrens.

Industry standards suggest that Public Safety Zones be calculated based on traffic movements at the levels expected for ultimate capacity of the airport, and revised every 7 years. The ATSB provides specific data based on the safety record of movements associated with the particular airport, meanwhile Boeing and Airbus feed in worldwide crash data on the performance of their air fleet.

To avoid compounded problems in the future, if the PSZs are to be introduced and mandated, ideally this would occur prior to any changes to the Planning and Design Code which may otherwise allow additional residential infill development to be established within the likely PSZ areas.

The SA State Government’s view on how Guideline 1 (if approved by the State) may be reflected in, or incorporated into, the Planning and Design Code is not yet known. It would seem likely this may be identified through an overlay which would then affect the types of development envisaged within the designated PSZ area.

Ideally such an overlay would incorporate all issues associated with Airport operations such as: Aircraft Noise, Obstacle Limitation Surfaces, and Public Safety Zone designations.

**Council is of the view that it is the role of the State Government to set these strategic planning directions and incorporate the PSZs into the Planning and Design Code in some way and not Councils.**

To avoid confusion with new terms introduced through the Planning and Design Code, it is recommended that should PSZs be introduced into a layer of the Planning and Design Code, that they be known as ‘public safety areas’ to distinguish between designated planning policy zones and any new overlay associated with airport hazards. (It is worth noting, this feedback was noted and implemented in the approved version of the document).
As the development industry prefers certainty it is preferable that the State Government makes a decision in the near future on whether to apply PSZs to land outside the Adelaide Airport boundary to ensure that development is not stifled by indecision and confusion.

Furthermore, there has been some consideration that the name of this area may be somewhat misleading- as it implies that public are safe in this area. However, the alternatives may create a level of unnecessary alarm among community members."

The City of West Torrens has undertaken investigations into aircraft noise, with a major aircraft noise survey. Following the outcome of the noise survey Council adopted the following position at its 6 November 2018 meeting:

Its policy position, to be used to influence the Department for Planning, Transport and Infrastructure’s (DPTI) development of the new Planning and Design Code, with respect to aircraft noise be the ANEF contour map recognising >25 ANEF as the threshold for managing aircraft noise and exclude land divisions in >40 ANEF with the following additional measures be approved by Council as its position with regard to Aircraft noise:

a. Development should be designed and located having regard to the flight paths, height restrictions and noise exposure forecasts issued by Adelaide Airport Limited.

b. Residential development on land within the area defined by Fig R111 is affected by aircraft noise from Adelaide Airport and should be designed, constructed and insulated to minimise effects of noise

c. Dwellings (and dwelling additions with habitable rooms) are constructed in accordance with the Australian Standard 2021-2015: Acoustics- Aircraft noise intrusion- Building siting and construction; or

d. Dwellings (and dwelling additions with habitable rooms) include the following construction techniques:

i. shielding windows and doors with external blinds or verandahs;

ii. using masonry walls for external walls and if brick veneer construction is used fully, by insulating the cavity wall with 75 millimetres to 100 millimetres insulation (rockwool or fibreglass)

iii. keeping window size to a minimum and using at least 6 millimetres single glazing or double glazed windows; where possible, windows of sensitive rooms should be oriented away from the direction of view to the flight path;

iv. air-conditioning sensitive rooms using a split or ducted system. Wall mounted air-conditioning units should not be used as they provide a weak path for sound transmission;

v. shielding doors with an entrance verandah and using a solid core construction;

vi. sealing airtight all cracks in the housing construction. Cracks between doors, windows and the house construction should also be weather sealed;

vii. positioning air exhausts in non-sensitive rooms, e.g. wall vents should not be placed in bedrooms or living rooms; and

viii. insulating the ceiling space with 75 millimetres to 100 millimetres ceiling insulation (rockwool or fibreglass)

Turning to ANEF contours, the City of West Torrens Development Plan does not include a spatial overlay of the ANEF contours, although there is reference to the AS2021-2015. The Code should:
Deliver consistent outcomes, currently, irrespective on the assessment stream or relevant authority (e.g. merit assessed by Council, Rescode by Council or private certifier and Renewing Our Streets And Suburbs scheme), the delivered outcome results in dwellings that either achieve AS2021-2015 with appropriate noise attenuation or no consideration of aircraft noise even in the same street and within ANEF contour 25;

Align envisaged development types with what can easily meet acoustic requirements with upfront guidance on sound attenuation measures that may be expected in varying types of land uses, requiring landowners affected by aircraft noise to take measures to minimise the impact;

Consider risk within a development assessment and National Airport Safeguarding Framework;

Provide public accessibility to ANEF contours and reference within the Code;

SAPPL does not adequately address acceptable, conditional and unacceptable building types as per AS2021-2015;

Building near Airfields module should be consistent across Councils e.g. City of Salisbury addresses noise affected areas with PDC’s that provides for suitable land uses based on ANEF contour and lighting restrictions based on proximity to airport;

In addition to the above:

Require landowners that are affected by aircraft noise to take measures to minimise impacts, such as noise abatement, while also requiring airlines and airport operations to adhere to curfews and to utilise routes that affect fewer landowners.

Adelaide Airport both impacts on, and is impacted by, the surrounding urban environment. Adelaide Airport is particularly exposed to climate change impacts. The surrounding urban infill pressures create more hard surfaces and less infiltration potential. This results in increased storm water and urban heat island impact in the locality.

Scenarios that include a confluence of adverse events, made more likely by climate change, could potentially have negative impacts on airport operations. From the perspective of CWT, we need to better understand, and have a closer association with the Airport Authority. For example, should a scenario arise where, due to extreme temperature and heat conditions during the day, planes were not able to leave, how amenable would our residential community be to planes only flying at night, once temperatures had cooled?

Is there a potential for access to the airport to be cut during a flooding or emergency event (local and DPTI roads)? What impact does this have? Who is liable for the network should the state roads be impacted by locally managed infrastructure?
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2.2 Strategic Transport Corridors

How can the Code work to protect the operation of major transport facilities whilst managing the impacts on adjacent development opportunities?

- Practical measures include:
  - Sufficient set back distance from the building to the road corridor so that greening and buffer strips can be added in the streetscape which will reduce noise, visual and pollution impacts that may be caused by transport movements and freight operations.
  - Require noise abatement measures to be installed on buildings, including consideration of directions of windows (particularly openable windows) and location of private open space.
  - Reducing the number of additional crossover points to major transport routes and where possible include slip roads or access to new development from side streets and/or rear laneways (noting, this approach needs to be balanced with any impact on existing neighbouring properties and CPTED)
  - Tree planting in the central median should be explored further. This appears to work (see image below: Portrush Road, Toorak Gardens as example (National Highway One)). Also note the high wall/fences of adjacent residential properties. These were primarily constructed during a road widening and undergrounding of the power infrastructure.

- Climate Change will have an impact on strategic freight routes, this is particularly relevant to the intermodal hubs/wharf facilities and road freight routes of inner and outer harbor due to sea level rise and coastal erosion.
How can planning policy better manage and minimise the impacts of transport corridors on surrounding development (i.e. noise and air pollution for residents)?

- While the discussion paper discusses the need to enable efficient movement of freight, there is no consideration of the potential role of heavy rail in achieving this. Research across the world has shown the benefits of using heavy rail as a long term solution to freight movement, freeing up valuable road space to be used to transport people using a variety of different compatible travel modes.

- Practical measures include:
  - Specific easements. A ‘canopy cover’ easement may be one such mechanism allowing dual functionality of the open space / green infrastructure.
  - Require noise abatement measures to be installed on buildings.
  - Sufficient separation from transport infrastructure to land use
  - Pollutants captured through use of rain gardens and WSUD

THEME 3: Sustainable mobility, car parking and the impact of technology

3.1 Walking, cycling and other non-motorised transport

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

Over the past 10-15 years, the SA Government has sought to increase the number of people participating in active travel (embracing walking, cycling and public transport use) but its various policy settings have ultimately failed to deliver this ongoing embedded change at a significant population level. There are many reasons for this, but one of the most important is the ongoing and uncritical acceptance of the “normal” response to congestion, which is to build more and more road infrastructure. Such a response effectively privileges motorised forms of urban travel and curtails investment into public transport infrastructure and supporting infrastructure for active travel modes (walking, cycling, skating etc.).

In order to facilitate and enable active travel opportunities, the following policy initiatives are suggested:

- Planning policy which prescribes the provision for active travel facilities in a similar fashion to requirements for car parking. Secure bicycle parking facilities and end-of-trip facilities (showers, lockers, etc.) should be a standard requirement for commercial, industrial, mixed use and large-scale residential developments, and such requirements should be built into the Planning & Design Code.

- Policy that ensures the provision of well-located, secure bike parking at all major destinations (railway stations, shopping centres, event spaces, major precincts, main streets). Such policy could be presented in a way to balance requirements for car and bicycle parking.

- Supplement existing policy in the SAPPL with policy from the Victorian Planning Provisions (VPP) which has delivered better infrastructure for cyclists across Victoria.
- Build on existing policy seeking higher density development close to centres, public transport hubs and along transit corridors by introducing design-based provisions that enhance accessibility to these areas by transport modes other than motor vehicles. The idea here being to increase the catchment area for walkers/cyclists while ensuring that walking/cycling routes to these destinations are convenient and attractive.

- The State needs a strategy to increase the use of the bicycle as a form of transport. To accomplish this investment is required. For this to happen there needs to be political-will that allocates funding on an on-going basis aligned with targeted cycling transport outcomes.

- Dedicated paths for walkers and cyclists to provide them with improved safety, confidence and convenience. Prioritise increased tree canopy and green landscaping to active travel routes to reinforce the pathway and to provide a more user friendly environment (such as shade).

- Climate change impacts (particularly extreme heat) necessitate that cycling and walking routes be designed with green infrastructure to actively cool the urban environment and provide shade and a cooler setting for those who engage in active transport.

- Through land use zoning, by encouraging increased densities to be located close to facilities and centres and public transport.

- Recognise that this will be a generational change and a focus on ensuring today's children start active travel habits early will be easier than expecting to change the well-established behavioural patterns and attitudes towards active travel in those already heavily car dependant.

- Innovative technologies such as car parking ferris wheel stacking could assist to reduce the footprint of temporary car parking, thereby planning for the transition to a future with a reduced car dependency.

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?

- Link and place principles should be carefully implemented to avoid dichotomising private vehicular use and active travel modes. Link spaces, for instance, are not all the same. While some roadways need to be prioritised for efficient transport reasons, other streets may be destinations in their own right and should, therefore, be conducive to active travel modes such as walking, cycling, skateboarding, and riding on scooters or mobility aids. The development of the road hierarchy therefore becomes important in identifying the potential for the creation of places and this should be aligned with the development of planning policy that focuses on developing places to go to, not just through.
To achieve this, planning policy should be crafted alongside local area transport plans in order to better apply the link and place concept to local streets. For local councils, many more streets should be categorised as ‘places’ rather than ‘links’. Analysis of the amount of ‘local’ versus ‘through’ traffic on collector roads should assist in determining which streets are categorised as places. It is also important that the categories ‘link’ and ‘place’ are not seen as mutually exclusive as streets often perform both roles. Noting, Council’s ability to have a localised policy approach may be reduced through the Code, which seeks a homogenous approach to policy in the name of ‘consistency’.

The role of public transport - through bus and tram modes - is crucial in successfully pursuing link and place principles and enabling the development and activation of places. Planning policy is currently geared towards regulating private transport. It does very little to promote or regulate public transport in a way that would make it more accessible and attractive to the population.

CWWT is currently in the process of updating its Transport Plan. Link and Place principles will be incorporated into the updated road hierarchy. A clearer Link and Place road hierarchy would allow different zoning and zoning policies to be developed to focus on the functions of each road and each area. The majority of the council streets are local streets with low traffic volumes, which enable the sharing of the road/road reserve space between all road users. Some of these local streets would be more well placed to maximise the Place opportunities. Developments should be encouraged to have regard to the street function (Link or Place), through appropriate policies.

For roads that primarily serve the Link function, policies that facilitate convenient and good access should be considered, including ensuring adequate road width is available to accommodate all user groups, satisfactory servicing of the site, streetscape upgrade and pedestrian access upgrade. One example is the 79 Port Road, Thebarton, major development where council was keen for the verge area (Phillips Street) to be upgraded (tree plantings, footpath upgrade etc.) as part of the development. Currently, the Development Plan does not have the policies or principles to more strongly require the developer to consider this aspect.

Ideally, planning policy would identify buffer zones, green infrastructure through WSUD and deep root zones, dedicated pedestrian zones, traffic calming through road diet (narrowing streets).

Car parking moved out of pedestrian centres (so that people who drive have to walk into pedestrian zones).

Provide dedicated paths for walkers and cyclists to provide them with improved safety, confidence and convenience.

Places provide scope for food trucks and vibrancy

How can the Code promote development that contributes positively to streets and the serviceability and quality of the public realm?

Planning policy should include provisions that enhance the amenity of public places, especially in areas that envisage facilitation of higher density forms of development.
• Infill development has seen the erosion of tree canopy across the suburbs resulting in significant heat loading and stormwater run-off impacts. Policy should require meaningful landscaping, the replacement on site of any trees removed to enable development and the incorporation of WSUD principles. Similarly, precinct-wide projects should include provisions that allow for ongoing development and nurturing of green spaces.

• It is imperative that the Code incorporates policy that enhances the amenity of streets, not just as places for people to live, work, shop and recreate, but also as places where active travel is an attractive and convenient option. While all streets should be accessible, not all streets should be "fast, efficient and minimise travel time" as stated on page 11 of the paper. Streets promoting active travel should be attractive and provide convenient and safe access to a range of destinations.

• The Code should have functional use assessments against vulnerability indicators for climate change of the intended use of the building. These would be a layer over NCC compliance and have performance based targets to assess exposure and techniques to lessen impact.

• Require building setbacks that enable more greening of streetscapes, shared paths, as well as privacy to landowners. Green infrastructure, WSUD and capacity to grow canopy trees to shade over hard surfaces and retrofitting streets to allow more water capture and permeability around movement spaces.

• Having a Link and Place hierarchy would assist the process. For streets identified as a Place function, policies for example to encourage the development to 'open up' into the public realm would be useful.

Does the Code need to more explicitly anticipate the needs of an ageing population through provision for things like mobility scooters or access vehicles?

• Yes, catering for an ageing population increases the importance of making streets safer and more appealing for active travel purposes. Footpaths are quite dangerous for scooter riders, younger cyclists and skate boarders. Accordingly, more (public) road space should be allocated for use by active travellers and that road space needs to be safe and convenient to use.

• Disabled parking requirements to be standardised. Currently we tend to leave it to Building Rules consent. If the population is ageing, the Code probably needs to reflect that by formalising the requirement on a consistent basis State wide and nominating what the parking rate should be. There is an Australian design standard that traffic engineers refer to, which gives a range of percentages for particular land uses, but not 'mandated' in the Development Plan. For example, Development in the Urban Corridor Zone does not require disabled parking provision.

• Two schools of thought have emerged internally within Council, highlighting a need for more research and communication on the needs of scooter user.
• In the event, scooter parking is to be provided it is common practice in car park designs, where there are 'unusable' areas, traffic engineers tend to nominate them for bicycle parking or motorbike parking. Such an approach reinforces the marginalisation of active travellers whilst privileging travellers using motor vehicles. It often leads to bicycle parking located in areas lacking casual surveillance or close to waste storage areas which is far from ideal. Ideally, parking for all forms of travel are given due consideration and provided in convenient and safe locations that are fit for purpose.

3.2 Car parking and emerging mobility technology
How can planning policy best respond to the impact of emerging technologies on our city and communities and how we move to and through them?

• Planning policy needs to be responsive to the opportunities provided by new technologies. It is important nonetheless that the outcomes of new technologies are well understood. For instance, the assertion in the discussion paper that autonomous vehicle use "...could play a valuable role in reducing private vehicle dependence" is highly problematic. The more likely outcome of autonomous vehicle use is higher levels of car dependency and higher levels of congestion as more unoccupied cars are travelling along streets. Both of these outcomes directly conflict with the goals of creating great places and reducing private motorised vehicle use.

• It may be a consideration that the Code implicitly makes provision for design outcomes that allow a change-of-use away from universal car-parking. Urban form (buildings and places) may need to be re-configured to meet the challenges of reduced private car ownership and increased sharing of resources (ride share, autonomous vehicles, self-guided buses etc.) The question here is whether we proactively meet the challenges required to adapt to these changes through planning and design, or whether we reactively address issues as they unfold. Planning policy based on the evaluation of realistic future scenarios will be key.

• The CWT update of the Transport Strategy will consider emerging technologies in greater detail and implication on our road network (see range of potential technologies below):
  o Smart City concepts
  o Future technological changes
  o Smart parking (in-ground detection sensors and app technology)
  o Hybrid and electric vehicles (charging ports)
  o Autonomous vehicles (Adelaide Airport trial of shuttle buses commenced)
  o Carpooling (DPTI trial commenced)
  o Free bike scheme (noting, after initial interest Obike and Ofo have ceased services in Adelaide)
  o Go-get or similar car scheme (shared use of vehicles)
  o Data collection technology (new detection, collection and management systems)
  o Travel demand technology
  o Bus information technology
  o Pedestrian crossing technology
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- City of West Torrens (CWT) is currently working with the developer of the Uni SA site (Thebarton) to consider Smart City principles in the development.
- Planning policy could be useful in the area of smart parking - for example developments which have large car parks could be required to implement space availability LED signage, individual space availability detection system, number plate matching system for pay to park rather than the traditional ticket spitter/boom gate layout. This would greatly improve accessibility in car parks, and reduce the potential for traffic bottlenecks at the access point numbers.

- In other areas where, if sufficient research is available to prove that GO GET car scheme (or similar) is able to reduce car ownership, then provide discounts to car parking numbers required for those developments that adopt such schemes, this has been proven effective in Melbourne and Sydney, but is yet to be tested in Adelaide. Also policies to encourage developers to provide electric charging points within larger car parks

How can the Code best respond to the variances in car parking requirements for different neighbourhoods?

- In a word: Transition. Planning policy needs to be responsive to the opportunities provided by new technologies. The Code needs to recognise that we are in a period of transition that the car parking requirements we once needed are falling away based on a variety of indicators, due to a range of factors. Flexibility will be required so that developments can test and push-back against restrictive minimum car-parking provisions that may not reflect current practice, in order to provide for car-free or 'car-light' developments that are serviced by public, active and shared transport/mobility solutions, rather than a baseline of privatized mobility outcomes and the space/cost impact associated with these. Where such car parking numbers are reduced, disabled car parking spaces should be accommodated so that parking needs of those with reduced capacity to utilise active travel modes are prioritised.

- Notwithstanding the above, there should be a standardised parking rate State wide, to remove inconsistencies between council areas. The parking rate should reflect more current conditions. For instance, many Council's development plans still have retail parking requirement at 7 spaces per 100m2, whilst traffic engineers have been applying far lower rates for many years. The parking rates should be updated to reflect the changed and changing trends in parking.

- While the Code seeks to simplify the parking requirements for 'change of use' applications, by narrowing rather than expanding on the land use categories, the concern is that some land uses would have far greater parking generation than others for the same floor area, restaurants and function centres being examples of these. If, in the simplification process, change of use from a typical office to a restaurant is permitted without Planning consent, this would give rise to parking overflow issues. Perhaps a listing, similar to complying use applications, where if you change a land use from A to B, C and D, you can do so without requiring consent, but from A to E (specific land use identified), you would need to demonstrate that the parking impact is manageable.
The over-simplification of the parking rates is already an issue for Urban Corridor Zones and Designated Areas, where a parking rate of minimum 3 spaces per 100m\(^2\) is the only rate specified for non-residential developments (except tourist accommodation).

For example, a 200m\(^2\) tenancy would require 6 parking spaces. If used as a cafe, the 200m\(^2\) could typically accommodate up to 200 seats. The difference between the parking requirements of the two land uses is quite significant. The current parking rate for the Urban Corridor Zone and Designated Areas do not reflect this. The Code should reassess this aspect, perhaps by having more sub-categories with different rates. As these zones are typically in areas with multiple public transport options, higher discounts to the parking rate for the land uses (compared to other zones) may still be appropriate, but not the blanket approach 3 spaces per 100m\(^2\).

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?

- The current approach is not working and is unlikely to support more sustainable mobility outcomes unless there is a significant shift away from current policy settings. The Code has an important role to play in promoting such a shift by allowing for differing car parking rates (including no provision) attached to particular forms and location of development.

- As mentioned before, disabled car parking should always be a part of the mix to ensure that the parking needs of those with reduced capacity to use active transport modes are prioritised.

- There are so many factors at play here. Within the CBD, it would seem obvious that having low or no parking requirement for developments would still be reasonable. However, outside of the CBD, CWT is still not of a density like the CBD or Norwood for example, such that parking is of less necessity for occupants.

- To a certain extent, the City of Adelaide’s Development Plan already has policies to restrict parking provision on-site for developments within the Core Zone. Conditions in the City of West Torrens are not clearly favourable for a similar approach.

- There is also the issue of public transport availability to encourage people giving up their vehicles for public transport. Notwithstanding the desire to reduce car ownership, it is noted that in Adelaide developers are still looking at providing car parking for apartments because the market demands it. Given that cultural change takes a long time, you can look at reducing the parking rate gradually, instead of the approach of reducing significantly at once or requiring no parking at all. This would be no different to changing parking rates in the tables in the Development Plan as trends become clearer through the normal DPA type process (or future similar code amended process).
• If the minimum parking rate is removed, it is suspected that parking issue would increase significantly. Developers of commercial and retail land uses would naturally look to provide as few parking spaces as possible and removing the minimum rate would facilitate them doing so. The principle of minimum parking rate should be retained.

• Reiterating the first point, there are many factors at play when considering parking rates, the need to reflect alternate travel options and investment into alternate modes of travel, education and a political push to promote sustainable modes of transport will need to be prioritised to create a shift from car ownership and parking.

General Feedback questions
Are there any other key opportunities and challenges that you think the Code should respond to?
• In any planning regarding transport the inclusion of Universal/Age Friendly principles are considered to ensure as much accessibility for as many cohorts as possible.

• Disabled and/or parent identified parking should be prioritised and conveniently located at entrances.

• Identify barriers that are deterring or preventing people from using public transport, and then develop solutions with them. For example, key barriers to using public transport in some areas are the lack of service or reduced frequency of service 'after hours' and on weekends and the Adelaide City centric focus of public transport.

Are there any other ideas for potential Code policy you would like to recommend?
• Encourage a matrix of transport types that feed into each other, such as small neighbourhood buses linking with major public transportation (e.g. trains), a system of intermodal integration.

• More urban development has been occurring (and continues to occur) in bushfire prone areas, however this is without the provision of additional transport infrastructure. Transport infrastructure influences the accessibility of emergency vehicles and the safe evacuation of residents, before and during bushfire events. This issue has not been addressed (or referred to) in this policy.