3 December 2018

State Planning Commission
DPTI Planning Engagement
Department Planning, Transport and Infrastructure
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Adelaide SA 5001

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SOUTH AUSTRALIAN PLANNING SYSTEM REFORM

Planning and Design Code
Integrated Movement Systems Policy Discussion Paper

The Integrated Movement Policy Discussion Paper released in August 2018 generally provides a laudable outline of the range and nature of issues, associated approach to pertinent policy and transition into the new Planning and Design Code (P+D Code).

A complete appreciation and review is challenging when, as acknowledged in the paper, it is one part of a package of 5 that should be read together but only the 2 are currently available.

It is understood a further 2 are to be released shortly, and final one in 2019, and periods for feedback provided accordingly. This doesn’t help with current review and leads to feedback not being available or able to be incorporated prior to the anticipated release of the new P+D Code policy in Phase 1 and subsequent phases from late 2018.

Higher level discussion has been ongoing during 2018 but the critical test occurs with the actual final detail of the policy and application in the new P+D Code. The actual policy should not be delayed and released as soon as possible to afford the maximum time period, genuine detailed community engagement, depth and length of discussion and potential comprehensive refinement of the actual policy.

This feedback should be read together with the Discussion Paper (and summary and background papers).
Integrated Movement Systems Policy Discussion Paper and Summary


The Policy Papers canvass the following:

Introduction
Purpose
Why are Integrated Movement Systems important?
How will our planning system support the integration of movement systems?
Theme 1: Aligning South Australia’s growth with transport infrastructure
Theme 2: Capitalising on strategic transport infrastructure (including corridors and facilities)
Theme 3: Sustainable mobility, car parking and the impact of technology
Policy Conversation Area – Sustainable mobility, car parking and the impact of technology
Transitioning to the Planning and Design Code
Next steps
Have your say

Integrated Movement Systems Background Paper


The Background Paper canvasses the following:

Purpose of This Background Paper
Part 1: Why Are Integrated Movement Systems Important?
Part 2: Relevant Policy Context
Part 3: Major Policy Themes for Our New System
Glossary
Appendices
References/Endnotes

The paper rightly reinforces the ‘Link and Place’ methodology but throughout reflects a consistent bias to prioritising the ‘Link’ transport function over the existing and potential desired ‘Place’ community amenity needs. A careful and clear determination needs to be made in each case regarding pertinent transport and main corridors to ensure proper and orderly planning (balance of transport and land use) is pursued.

In many cases a priority is warranted for the ‘Place’ community amenity and the transport function should be tempered accordingly. This is particularly applicable to traditional local service ‘Main Streets’, eg Unley Road, Goodwood Road etc. Those major transport corridors in tension with a traditional main street centre deserve a ‘Place’ consideration and potentially a land use priority over transport to some degree
and/or for some portions, e.g., Parkside/Eastwood and Fullarton/Frewville activity centres on Glen Osmond Road.

Similarly, the promotion of reduced on-site parking with development, premised on proximity to public transport routes, is not being adequately supported by strategic planning and investment in the frequency, convenience and effectiveness of Public Transport services to address necessary origin and destination practical needs.

Such an approach would better support The Greater Adelaide 30-Year Plan strategic focus towards supporting vibrant mixed land uses and high-density residential on many such corridors. The balance will vary for each corridor and/or for different parts of the length of corridors but the desired nature should be strategically resolved and appropriate policy responses applied accordingly.

More detailed feedback on the Policy Transition Recommendations is provided in the attached appendix and follows the Paper’s structure and suggested Discussion Points, without limiting further observations.

This feedback has its basis in existing City of Unley Strategies, Plans and Targets:

- Community Plan 2033 and Four Year Delivery Plan 2017-2021;
- Development Strategic Directions Framework;
- Integrated Transport Strategy;
- Walking and Cycling Plan;

As a general observation, in large part the recommendation for the P+D Code policy is to transition the existing SA Planning Policy Library (SAPPL) content. The existing SAPPL policy scope and expression is often limited, weak and vague, compromising effective and good design outcomes. Furthermore, an equitable and efficient initial design and assessment process is compromised with unproductive argument about unclear requirements. It is recognised the policy will be reviewed and potentially refined, and consequently there should be much more rigor, clarity and pragmatism applied to the policy content and expression.

It is trusted this general and specific feedback, sought by the 3 December 2018, assists with the State Planning Commission and Department of Planning Transport and Infrastructure refinement and enhancement of the P+D Code policy library.

Should you have any questions please contact David Brown, Principal Policy Planner, on [contact information] or [contact information].

Yours faithfully

Peter Tsokas
CHIEF EXECUTIVE OFFICER
### Integrated Movement Policy Discussion Paper

**Transitioning to the Planning and Design Code - Recommendations**

**Theme 1: Aligning South Australia growth with transport infrastructure**

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<thead>
<tr>
<th>Ref</th>
<th>Key opportunities and challenges</th>
<th>Comment</th>
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<tbody>
<tr>
<td>1A</td>
<td>In 2012, a suite of higher density, mixed use zones were introduced into the SAPPL which have been spatially applied to a small number of areas adjacent to key transport corridors and centres. These zones help to integrate land use and transport systems and can provide the foundation for this outcome in the new planning system.</td>
<td>The principle of these zones remains relevant and valuable. The specific policy needs continued review to ensure design outcomes improve and can become flagships for alternate housing options. Investigation should occur regarding links and ways to assist with investment in related public realm band improvements in footpaths, walking and cycling networks.</td>
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<td>1B</td>
<td>A minimum threshold of population density to ensure public transport and local shops and services are viable and can be located within walking distance of where people live needs to be identified.</td>
<td>What is ‘walking distance’ and its measurement needs review and sophistication to reflect the more realistic actual walking distances to Public Transport stops. Key element to support Active Neighbourhoods targets.</td>
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<td>1C</td>
<td>Some transport corridors are currently underutilised and could benefit from better integration with supporting land uses.</td>
<td>Probably true especially along some of the high capacity fixed rail lines.</td>
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**Discussion Questions**

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

Public transport needs to be an integral infrastructure consideration with new development. Critical policy is specific to different metropolitan and regional scenarios and Public transport networks to get the best and pragmatic outcomes.

*What other policy provisions are needed to facilitate good quality development that supports the desired minimum residential densities in key zones?*

Where localities have significantly increased densities, policy provisions need to focus on getting high quality design outcomes with a strong emphasis on streetscape, landscaping and minimising detrimental impacts on the public realm and the utility of existing public streets not necessarily designed to accommodate more intensity of use and parking.

Additional public realm and integrated public spaces need to be provided to offset the lower allocation of private open space and promote walkable communities.

Better policy to prevent undersize site development and ensure benefit of site amalgamation to optimal / practical minimum size, primary street frontage and dimensions for anticipated development type and density.
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?

More work needs to be done to address the impacts on public realm where medium/high density development will become the norm particularly in streets not designed to accommodate higher densities which anecdotally leads to higher levels of on-street parking, and greater challenges with waste collection. Further to this, ensuring verge improvements is installed by the developer at the end of construction period, to allow more immediate streetscape improvements that are not affected by construction activities.

Require more prescriptive landscaping policy and adaptable parking requirements that allow for changes in lifestyle and technology.

Theme 2: Capitalising on strategic transport infrastructure

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<tr>
<td>2A</td>
<td>The SAPPL contains an Airfield Zone which seeks to protect the ongoing operation of airport facilities and manage the interfaces with surrounding land uses. There is an opportunity to expand policy for appropriate complementary development types.</td>
<td>Value in investigating further compatible activities for the airfield zone.</td>
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<td>2B</td>
<td>With the changing nature of the ways freight is moved, there is an opportunity to review the planning policy in relation to the operation of intermodal facilities and freight transport hubs, including their potential future expansion.</td>
<td>Appropriate to review and ensure that policy best supports appropriate and best practice freight transport.</td>
</tr>
<tr>
<td>2C</td>
<td>The application of planning policy for airports varies considerably across the state. A key opportunity will be to improve policy consistency with Federal Government guidelines on airports.</td>
<td>Appropriate to provide greater consistency for planning policy around airports.</td>
</tr>
<tr>
<td>2D</td>
<td>Protecting ports from encroachment from incompatible land uses is becoming increasingly important to protect their current operations, critical transport links and future expansion opportunities.</td>
<td>Appropriate to ensure that ports are protected from the encroachment of inappropriate land uses.</td>
</tr>
<tr>
<td>2E</td>
<td>Currently, the spatial extent of land required for future road widening requirements is not included in Development Plans.</td>
<td>Value in incorporating road widening requirements as an overlay in the P+D Code. Design guidelines should be developed to limit statutory referrals.</td>
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<tr>
<td>2F</td>
<td>Moving into a new planning system, there is a need to ensure that land uses are appropriately supported by transport options and that our transport corridors remain efficient.</td>
<td>Need greater clarity around freight movement corridors in the metro areas and treating these in a different way to other transport corridors. Highlight the hierarchy of transport corridors aligned to the mode used to allow for the</td>
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Discussion Questions

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

Policy should seek to spatially minimise potential conflict with existing incompatible land uses and ensure that there is sufficient space for facilities to grow while maintaining appropriate buffers from potential future land uses. Policy should also require design responses to minimise impacts on existing and future land uses. Policy should clearly prioritise strategic transport assets. Strategic locations need to be identified and protected as soon as possible so any purchasers are aware of adjoining land uses.

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

Policy should provide buffers or transition zones which protect incompatible land uses, where conflicting land uses already exist. Expansion of transport facilities should be contingent on appropriate mitigation and minimisation of potential impacts. Strategic transport routes need to have policy that ensures maximum traffic flow and restricts sensitive uses and accounts for support elements such as stops and parking needs as collection points.

**How can planning policy better manage and minimise the impacts of transport corridors on surrounding development (i.e. noise and air pollution for residents)?**

A clear delineation of the balance between ‘Link and Place’ is needed whereby priority transport routes can be avoided by sensitive land uses and conversely routes for residential and people amenity can be supported by tempered transport management. Where sensitive uses or function design on transport corridors is considered, policy should require design solutions that address issues such as minimising impact on traffic flows and taking into consideration aspects such as noise, air quality and heat island effect from road surfaces as well as sympathetic design for the supporting infrastructure such as poles, wires and stops. This needs to be balanced against the promotion of walkable neighbourhoods with quality public realm.

**Theme 3. Sustainable mobility, car parking and the impact of technology**

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<tr>
<td>3A</td>
<td>The current walking and cycling SAPPL policy is well placed to be transitioned into the Code.</td>
<td>The current provisions address cycling and walking but should be reviewed to incorporate positive and practical criteria for new development, destination facilities and best practice. Tensions between traffic flow targets</td>
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<tr>
<td>3B</td>
<td><strong>Cycling routes are not universally incorporated into Development Plans.</strong> This leads to inconsistency of application of design rules etc. relating to cycling.</td>
<td>Reasonable approach to include cycling routes as a layer to provide consistent approaches, but maintaining route reviews, additions or updates in Code will need to be pro-active and facilitated.</td>
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<td>3C</td>
<td><strong>As travel behaviours continue to change, the demand for car parking will also change.</strong> It is important that new buildings and structures, particularly multi-level car parks, are adaptable for future uses.</td>
<td>Sensible approach to monitor and review, but a slow transition and varied relative to location and circumstances. New forms of vehicles such as electric, hydrogen cell and driverless vehicles in the future will be significant, as well as affective Public Transport.</td>
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<tr>
<td>3D</td>
<td><strong>Car parking rates in current planning policy are often inflexible and do not consider innovative design or proximity to other transport options.</strong></td>
<td>Current SAPPL policy includes very favourable discounts for proximity to public transport. Whilst a degree of flexibility is warranted the transition to lower on-site parking provision needs to be supported by suitable planning and investment in effective Public Transport network and services. Without improvement the implications of true car use and parking congestion are not being addressed.</td>
</tr>
<tr>
<td>3E</td>
<td><strong>There is potential for greater standardisation of car parking rates, while still allowing for different rates for conditional and geographical contexts.</strong></td>
<td>Carparking standards and the circumstances for variation in those standards should be consistent across the metropolitan area and based on evidence. Shared car schemes could form a relevant and appropriate alternative provision to a limited amount of specifically allocated parking in certain circumstances.</td>
</tr>
<tr>
<td>3F</td>
<td><strong>Planning policy has a role to play in encouraging and supporting the uptake of technology which helps future-proof our neighbourhoods.</strong></td>
<td>Australian Standards for vehicle parking layout, spaces design and access need to be reviewed and updated to address changing vehicle types, sizes and facilitating manoeuvrability, ie current popular utes exceed norms.</td>
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<td>3G</td>
<td><strong>It is important to ensure that planning policy is in place to help facilitate the uptake of emerging technologies that support better car parking efficiency.</strong></td>
<td>Community Title schemes efficiency could be improved by allowing separate titling of carparks to dwellings without penalty (ie P+D Fund Open-Space contribution) so they may be minimised and ‘traded’ between occupants subject</td>
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</table>
Mixed and traditional established scenarios could be improved by effective Off-Set Scheme that ensures close nexus within an area, opportunity exists, balance against other public realm streetscape, trees, WSUD etc needs and not easy avoidance of critical on-site amount and site / parking areas amalgamation for shared use and optimal efficiency.

**Discussion Questions**

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

One approach would be to ensure P+D Code includes overlays for cycle paths, significant pedestrian access routes. Ensure that policy requires that opportunities are considered in development assessment of applications. Land divisions should require continuity of footpaths and walking or shared access paths and incorporate open space and usable public realm.

**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?**

Providing clarity concerning what the priority is for different routes and encouraging development which is compatible with those priorities. Allowing greater flexibility in public realm design where roads (or portions of roads) are prioritised for places rather than links. More clearly identify bike friendly roads. Roads need to be treated as shared use zones with variable speed zones (eg 60km peak, 40km off peak) and roads and footpaths at the same grade to favour pedestrians over vehicles.

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

Ensure that parking policy provides adequate levels of practical onsite parking for the majority of development and ensure that waste management policy provides adequate options to manage waste collection in an orderly and communal manner.

Landscaping policy should also require that developments provide adequate areas and scale of landscaping, including addressing the street, with greater requirements upon developers, including underground power lines to allow for trees that can reach an unrestricted height (not affected by wires) to increase canopy coverage and reduce heat island effect.

Additional or wider spaces adjacent to developments should be supported by developments to promote liveable spaces and offset loss of private realm open space and landscaping.

**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, policy needs to be considered but shouldn’t necessarily form mandatory requirements and public realm and footpaths adjacent to developments need to be wide enough for these uses and landscaping without compromise. Integrated design solutions need to be encouraged.
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?

By being flexible and reviewing policy on a regular basis to ensure that it reflects contemporary and best practice. Ensure adaptability is built into carparking infrastructure and allowing for sharing of data generated by sensors to improve future planning.

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

By using data and evidence to understand what those requirements are, why and setting appropriate minimum standards that also need to account for changes in vehicles such as current SUVs with larger turning circles.

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 Code can provide for a flexible approach dependent on type, nature, mix, location, demographic attributes and viable transport options. Using very low parking requirements as a blunt instrument to shift behaviour should only be used cautiously where there is clear evidence that it will be effective. Public Transport and alternative Walking and Cycling modes planning and investment is lacking and well behind encouragement of reduced on-site parking. Need to go hand-in-hand.

When vehicle parking is provided, it needs to be generous enough to accommodate modern vehicle trends such as SUVs and allow for parking and exiting and circulation around the vehicle to encourage use of the space.