3 December 2018

Ms Sally Smith  
General Manager, Planning and Development  
Department of Planning, Transport and Infrastructure  
PO Box 1815  
ADELAIDE SA 5001

Dear Sally

Integrated Movement Systems Policy Discussion Paper

The Housing Industry Association (HIA) appreciates the opportunity to provide feedback on the Integrated Movement Systems Policy Discussion Paper and congratulates the Department on the work undertaken so far to provide a more efficient planning system.

HIA acknowledges the significant role that a well-planned transport network plays in the economic competitiveness and livability of the state and the significant economic and social benefits delivered by facilitating development in locations that maximize the highest and best use of the transport network.

HIA is concerned that items discussed in the paper such as public transport needs, increasing the width of public footpaths, increasing street landscaping, reduction of road widths, car parking, creation of bikeways, etc. most of which is public infrastructure either controlled by State or Local Government. The paper fails to identify how these targets will be planned, funded and implemented or how authorities will be encouraged or compelled to implement any of these policies.

Transport corridors appear to be weighted towards services into and out of the city. Further investigation on cross town or ring routes, cycle and walking trails should be encouraged. HIA maintains that Local and State Governments who manage existing local footpaths, cycling tracks and public transport infrastructure encourage more public use.

The 30 Year Plan For Greater Adelaide (2017 update) target of 85% infill development to 15% greenfields provides very little opportunity for privately funded developments to have any major impact on existing movement in residential areas. State and Local Government will therefore be required to do the "heavy lifting" in regard to the desired outcomes of providing more integrated cycle ways, walking trails and public transport.

New development in infill areas provide little opportunity for private developers to include the infrastructure proposed for integrated movement systems. HIA is concerned that there is potential for small scale developments being captured within the new policies with offset schemes and levies, and is concerned that building costs will increase as a consequence.
HIA is concerned also that the recent change of government and its commitment to a significant increase in population growth targets will provide consequences that impact on proposed Integrated Movement Systems Policies and urges DPTI request a review of anticipated population numbers and reset targets as required. More broadly, the 30 Year Plan of 85% infill to 15% Greenfields development targets should be deleted with the objective to provide development in line with industry and consumer demand.

HIA maintains that one of the over-arching principals of the planning reform process should be that any new initiatives should not come at the cost of a negative impact on housing affordability. To ensure that this achieved a cost benefits analysis should be undertaken as a priority to identify the impact of any new requirements on residential building and land supply.

Yours sincerely
HOUSING INDUSTRY ASSOCIATION LIMITED

Stephen Knight
EXECUTIVE DIRECTOR
South Australia
HIA is the leading industry association in the Australian residential building sector, supporting the businesses and interests of over 43,000 builders, contractors, manufacturers, suppliers, building professionals and business partners.

HIA members include businesses of all sizes, ranging from individuals working as independent contractors and home based small businesses, to large publicly listed companies. 85% of all new home building work in Australia is performed by HIA members.

EXECUTIVE SUMMARY

HIA supports planning reform as a means of ensuring planning systems remain modern and have the capability to appropriately respond to the on-going range of contemporary matters. Attached is HIA Policy – Planning Reform.

It is submitted that a balanced approach is of upmost importance when considering and implementing planning reform as this enables the broad range of objectives from the government, community and industry be taken into account, also of equal importance, is to ensure that when planning reform is being undertaken, a reasonable level of planning certainty is maintained as this enables businesses to proceed with confidence and with confidence comes a greater preparedness to invest, commit and innovate.

Notwithstanding HIA’s support for planning reform, for a number of reasons, we are also mindful that planning reform has the potential to be disruptive for industry; if the process is protracted or information provided as part of the consultation is ambiguous or the process appears to be undertaken such that there is a foregone conclusion as to what the reforms will deliver. It is government’s responsibility to appropriately and effectively manage planning reform and gain faith and trust from industry so as to enable industry to continue delivering high quality built form.

Residential construction industry practitioners have a firm understanding of the range of business variables that must be attended to regularly, however there is also a very reasonable expectation that individuals and businesses should be able to proceed with confidence and rely on statutory processes that have been well considered and appropriately implemented so as to be reasonable in how they can be applied and provide certainty as to how matters will be processed. HIA does not support statutory processes whereas, if a performance measure or a condition on a permit cannot be satisfied the default position is payment of a levy, or similar. Performance measures etc. must be reasonable and only arrived at following robust cost benefit analysis and or regulatory impact assessments that have been undertaken and rigorously reviewed by effected stakeholders. Should performance measures and or conditions on permit not be able to be satisfied, this must be a clear indicator to government to investigate the systemic reason and not, as mentioned above, rely on payment of a levy to satisfy a requirement? As with many levies, levies applied in this manner negatively contribute to housing affordability as the cost of these expenses reflect in the purchase price and are incurred by the first purchaser and carried through the life of the mortgage.
INTEGRATED MOVEMENT POLICY DISCUSSION PAPER

This Discussion Paper makes a very clear nexus between two elements of an integrated movement system; the performance of transport networks and patterns of development. HIA agrees these two elements are interdependent and therefore must be strategically planned and delivered accordingly. Sequencing of development and the timely provision of infrastructure requires co-operation between government and industry and a reasonable degree of flexibility to allow for adequate response market conditions.

The section of this Discussion Paper titled: Why are integrated movement systems important? begins to explore a third element of integrated movement systems, that being; the uplift in the value of land based on the provision of transport networks and patterns of development. Once this element has been introduced the Discussion Paper is unclear or seems reticent to advance this discussion. HIA would be willing to discuss these elements of the Discussion Paper further with Government to gain a better understanding of Government thinking in terms of strategic and integrated planning systems and share with government HIA’s perspective.

The Discussion Paper develops a thorough and robust discussion around the strategic elements of integrated movement systems such as sustainability and healthy neighborhoods, however it is considered the paper would benefit by further developing the discussion of incentives and the statutory provisions that may be considered for developments that aim to decrease reliance on private vehicle transport.
DISCUSSION QUESTIONS

ALIGNING SOUTH AUSTRALIA’S GROWTH WITH TRANSPORT INFRASTRUCTURE

Q1 How can the Code better respond to the differences in public transport availability in urban and regional communities?
A1 Consultation with relevant authorities.

Q2 What other policy provisions are needed to facilitate good quality development that supports desired minimum residential densities in key zones?
A2 Planning policies should facilitate high density zones in the CBD, Master Development Zones and transport corridors, transitioning into medium density gradually moving away from the high density zones into conventional residential zones with two storey height limits.

Q3 Does existing policy within the SAPPL adequately address issues relating to the perceived quality and impacts of higher density developments? (For example, the integration and cumulative impacts of parking and vehicle movement, public realm, and streetscape interface.) How might targeted policy reform promote or incentivize better outcomes.
A3 Planning policies should facilitate high density zones in the CBD, Master Development zones and transport corridors, transitioning into medium density gradually moving away from the high density zones into conventional residential zones with two storey height limits. Community consultation appears to indicate car parking guidelines in the higher density developments is NOT working.

CAPITALISING ON STRATEGIC TRANSPORT INFRASTRUCTURE

Q4 How should planning policy balance the need for airports in strategic locations against the impact of these facilities on adjacent land owners?
A4 Better long term planning.

Q5 How can the Code work to protect the operation of major transport facilities whilst managing the impacts on adjacent development opportunities?
A5 Develop policies that encourage compatible uses or relocate transport corridors to provide uncomplicated access to delivery bases.

Q6 How can planning policy better manage and minimise the impacts of transport corridors on surrounding development (i.e. noise and air pollution for residents?)
A6 Develop alternative direct routes for heavy transport, build in noise & air pollution parameters on the high density “TOD’s”.
Q7 How can planning policy better enable the delivery of more walking, cycling and active travel opportunities?
A7 The Planning Code should encourage high density developments in and around employment opportunities and within a reasonable distance to public transport, shopping centres etc. resulting in “live, work and play” communities. The development of high quality & well maintained walking & cycling paths that are linked together and to public transport that are safe for all users must then be financed through the increased rate revenue generated.

Q8 How can planning policy assist in balancing the tensions between prioritizing the movement of vehicles (link) and the quality of the space for pedestrians (place) along our streets?
A8 Increased densities require better public infrastructure which must be provided by local and state authorities.

Q9 How can the Code promote development that contributes positively to streets and the serviceability and quality of the public realm?
A9 The Code must firstly have commitment from both State & Local Government whom have control and ownership of the streets, nature strips and public parks, which appears so far to be lacking in principal to the Planning Policies. As inner metropolitan densities increase, additional greenery and storm water soakage areas will need to be created in public parks and streets.

Q10 Does the Code need to be more explicitly anticipating the needs of an ageing population through provision for things like mobility scooters or access vehicles?
A10 Mixed used developments with commercial shopping zones in closer proximity to residential zones, ring route transport, increased disability carparking, scooter zones and as set out earlier well maintained safe walking corridors linked to each other, shops and or transport.

Q11 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?
A11 Additional consultation with relevant industry professionals.

Q12 How can the Code best respond to the variances in carparking requirements for different neighborhoods’?
A12 South Australian commuters are still very attached to their vehicles because of the lack of efficient public transport. On-site car parking is still required in many developments in suburban areas.

Q13 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.
A13 Car parking requirements appear to be very emotive, so rather than wide ranging planning policies, a more workable solution would be to review the car parking requirements on individual “master plan” developments and on individual sites to suit the particular needs of the community and the area where the development is taking place.