

**Ref: Admin|BNW**

28 February 2020

Sally Smith  
Planning and Land Use Services  
Department of Planning, Transport and Infrastructure  
77 Grenfell Street  
ADELAIDE SA 5000

Dear Sally,

## **STATE PLANNING REFORM DRAFT PLANNING AND DESIGN CODE - PHASE THREE**

Thank you for the opportunity to provide feedback in relation to the *Draft Planning and Design Code – Phase Three (Urban Areas)*. I wish to provide the following comments in relation to Phase Three documentation.

By way of background, CIRQA is an urban mobility consultancy specialising in the provision of traffic engineering and transport planning services. The focus of CIRQA's expertise lies in the assessment of traffic and parking aspects associated with a wide variety of development projects. The majority of our work is undertaken for private developers (albeit we also provide advice to Local and State Government authorities).

As a member of the Urban Development Institute of Australia's (UDIA) Greenfield Committee, I have previously provided general feedback in relation to Phase Two (Rural Areas) as well as Phase Three which has been incorporated into the UDIA responses. Nevertheless, I provide the following additional comments in respect to key transport considerations associated with the Phase Three documents for consideration:

- Many of the Deemed-To-Comply requirements regarding access in the Major and Urban Transport overlays are overly onerous and would rarely be met by developments (if at all in some cases). While I understand that there is then a process for Performance Assessment (when deemed to comply requirements are not met), there is a danger that that referral agencies will simply view the DTS requirements as still being the target outcomes to meet the POs for each element and resist deviation from them (it is common for referral agencies to focus on 'ticking a box' from a standard or guideline, rather than 'engineering' a practical yet safe solution to a

specific situation). This has the potential to set the 'goal posts' for access arrangements extremely high (particularly given most of the DTS requirements are in excess of the requirements of the relevant Australian Standards or Austroads' guidelines – which, in my view, would generally be a more appropriate benchmark for DTS requirements). I am of the opinion that the access spacing, sight distance and queuing provisions identified in the Phase Three documentation are all conservatively high and overly onerous.

- The sight distance requirements for access points require further detail on how they are to be applied/measured. There are numerous different ways of measuring sight distance (for instance, setback from the roadway adopted – 2.5 m, 3 m or 5 m; height that it is measured from – driver eye height, object height or level of road etc.). I query whether we need an additional set of sight distance requirements, when typically the Austroads' guides are considered to be the benchmark for assessing such provisions (surely the Austroads' requirements could simply be adopted).
- For the Major Urban and Urban Transport Overlays, the application of the Access Queuing arrangements requires clarification. Firstly, where is the measurement relevant to the 'access point' undertaken (is it from the kerb line of the access point or the property boundary)? Secondly, the requirements for vehicles over 8.8 m (Urban Transport Overlay) and 12.5 m (Major Urban Transport Overlay) is unclear – does use of these vehicles automatically result in a proposal deemed to not satisfy the requirements or does no criteria apply (as it seems to suggest but would seem non-sensical compared to the requirements for smaller vehicles)?
- I consider that further review of the proposed parking provision requirements (Transport, Access and Parking Tables 1 and 2) is required. While it is acknowledged that these are simply the DTS requirements and there is opportunity for further review of an application's rates if they differ from those specified in the Code, there is a risk that assessment authorities will simply expect full compliance with these rates. It is therefore important that they appropriately reflect realistic parking demands for various land uses.

Additionally, the application of conservatively high parking rates risks applicants simply over-supplying parking to meet the DTS requirements. This would be contrary to the broader objectives of various State and Local Government strategies to reduce reliance on private motor vehicles and encourage greater use of active and sustainable transport.

The rates generally appear to have been adopted from historic rates from sources such as Planning SA's *"Parking Provisions for Selected Land Uses"* and the Aurecon *"Parking Spaces for Urban Places"* study. The Planning SA parking document is outdated (and I believe no longer considered a current document by DPTI). The Aurecon study simply reviewed rates identified in other historic literature (rather than providing updated survey data for relevant land uses) and also includes numerous errors in the formulation of its recommended rates.

I would suggest that DPTI consult with local specialist traffic and transport consultants (such as CIRQA, MFY, GTA, Phil Weaver & Associates and Frank Siow & Associates) in respect to the identified parking rates. Specialist consultants (such as those noted above) deal with parking survey data and demand assessments on a daily basis and tend to have a better understanding of realistic parking rates than larger engineering firms with broader service capabilities. While the above specialists may have differing opinions on appropriate rates, I would expect there would be a reasonable level of consensus as to what contemporary rates should apply. Nevertheless, initially, I provide the following high-level comments in relation to the parking rates identified:

- there are some relatively common land uses not included such as student accommodation, gymnasium (class based) and 24-hour fitness centres that would be beneficial to include (if a use is not defined in the list, does it automatically deemed not to comply?). The exclusion of these uses may relate somewhat to the definition of these uses falling within broader terms (such as defined residential uses for student accommodation or indoor recreation centres for gyms/fitness centres). However, these uses tend to generate relatively different demands compared to the more broadly defined uses;
- in respect to indoor recreation facilities, it would be desirable to include additional uses such as basketball, netball, volleyball, multi-use courts etc. to provide more direction to applicants for such facilities. Consideration should also be given to rates for outdoor recreation facilities such as Australian Rules football, cricket, soccer and hockey facilities which can generate relatively high demands;
- the rates identified for shop uses are high, particularly for standalone shops (or even shops in 'high street' environments on separate titles from adjacent shops where parking/loading cannot be shared);
- the rates identified for primary and secondary education are generally reasonable (albeit slightly higher than CIRQA has observed during recent education projects). However, application of these rates would require set-down/pick-up parking and student parking to be accommodated within school sites which contrasts with the Department for Education's policy that such provision not be provided on-site (i.e. they require use of on-street parking for such parking);
- the rates identified for industrial/store/warehouse uses are extremely conservative and would likely result in significant over-supply of parking for such uses. The traditional rates adopted by most (but not all) metropolitan Councils for these uses are considered to be appropriate (for reference, the City of Port Adelaide Enfield's Development Plan includes these rates); and
- the rate identified for tourist accommodation (outside of Designated Areas) is conservatively high. Such uses typically operate below full capacity and have other efficiencies such as two (or more) rooms being associated with one

booking (and one vehicle). Staffing levels are also typically lower during the peak period associated with guests being on-site (overnight).

- The Designated Areas table for parking (Table 2) identifies that the rates only apply where the area is within 400 m from a bus/Obahn interchange, rail station, tram station or Adelaide Parklands. Compared to current Designated Area conditions in most metropolitan Development Plans, the proximity to high frequency bus services has been removed. I consider that the proximity to high frequency bus services (such as 'Go Zones') is valid justification for application of reduced rates and that this should be included in Table 2 (i.e. within 400 m of a bus interchange). Additionally, I note that the applicable distance for train services is 400 m whereas, traditionally, a catchment of 800 m is adopted for such services.
- I note that the bicycle parking provisions only apply within Designated Areas. This is a poor outcome in relation to the support of active transport. While the rates for bicycle parking are generally considered to be appropriate, I would strongly suggest these apply in all areas (not just the Designated Areas).

Thank you again for the opportunity to provide feedback on the Draft Planning and Design Code – Phase Three (Urban Areas) documentation. I would welcome the opportunity to discuss the above comments further.

Please feel free to contact me on [REDACTED] should you have any queries or wish to discuss further.

Yours sincerely,



**BEN WILSON**  
Director | CIRQA Pty Ltd