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?

There clearly is a need for better rail services and more frequent bus services connecting regional areas to the city. For example in certain suburbs of the Adelaide Hills buses only run Monday – Friday. There are also very limited bus services from Victor Harbour to Adelaide. For anyone with a disability who can’t drive they are prohibited from travelling to the city. The challenge is a social equity one and therefore Governments need to subsidize public transport in regional areas and in areas of low socio-economic disadvantage.

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

Residential intensification is an issue that has not been sufficiently discussed in the public realm. In respect to ‘desired minimum residential densities in key zones’, there needs to be a debate on how it is going to be achieved. Developers will range from owners taking advantage of the size of ‘their blocks’ to development in partnership with Councils and Government. The character of ‘zones’ will change, which in itself is an issue.

Recent experiences with the Fitzroy Terrace proposed development has raised questions about the role and processes of the Coordinator General and DPTI. The development in question progressed to the SCAP despite being inconsistent with the character and local heritage of the zone. Fortunately the SCAP rightly rejected the development application.

One has to question why DPTI is putting forward developments to the SCAP that are inconsistent with both character and local heritage requirements.

The nature of residential intensification will require ‘space’ and while it presents less of a challenge with development of an area, the block-by-block development doesn’t have the capacity nor the ‘reach’ to ensure ‘public spaces’ are in place to compensate for the loss of green space. There does not exist at a local and state level mechanisms or funding to compensate for the loss of green space and effect on diversity.

‘Intensification’ increases the percentage of ‘hard surfaces’ and the loss of green environment. Policy must be put in place that requires a ‘minimal density of green space’ not just ‘borders to be planted with indigenous species consistent with the area.’

There needs to be a change in State planning regulation and monitoring that prevents and ensures desired minimum residential densities are adhered too. A poor example of this not taking place is on Churchill Road and has led to significant problem along with a decrease of livability for residents in Prospect.

For the inner suburbs that are rich in character homes from the turn of the century it is critical that there is increased regulatory requirements and overlays ensure new builds are in keeping with the character of the suburb.
Importantly new builds need to be of quality, sustainability and have the highest environmental /energy ratings. From an environment perspective more emphasis needs to be placed on the sustainability of new developments/housing.. It is greatly concerning that some of the poor quality housing currently being built replacing character homes that are over a 100 homes may only have a 30 year life.

Public transport services have not kept up with the increase of infill development in the inner suburbs over the last decade. Increased infill and the lack of reliable public transport has added to traffic congestion and reduced significantly livability for residents living in the inner suburbs.

*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?*

PLEG is of the opinion that the ‘South Australian Planning Policy Library Version 6 does not address actual impacts of higher development. Therefore SA Planning Policy Library Version 6 needs to be rewritten to address the impacts of higher development.

**THEME 2: Capitalising on strategic transport infrastructure**

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

Critical to the response in the first instance is an understanding of the level of growth in airport traffic especially the export of fresh food. Perhaps the question is how long can the Adelaide Airport continue to operate at its present location?

Over the last 5 years the number of flights flying low over the inner suburbs has dramatically increased. We would like see flight paths adjusted so that other suburbs in Adelaide share the burden as inner suburbs are also battling huge issues with increases in traffic volume, congestion and associated noise and pollution.

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

The nature of the ‘adjacent development opportunities’ should only be developments that enhance or are consistent with major transport facilities. The Code needs to include the ability to approve only developments that enhance the operation of the pre-existing transport facility.

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

The City of Prospect has seen livability for residents reduced significantly over the last decade due to the impact of increased traffic. Residents who live in Broadview,
Nailsworth and Collinswood are challenged by the proximity to Main North Road, Main North East Road, Hampstead Road, Regency Road and Nottage Terrace. Therefore increased densities along transport corridors and within these suburbs directly impact residents in relation to both noise and pollution. What is concerning is that in SA we do not measure/monitor the effects of residents health living on or near major transport corridors.

Measuring and monitoring needs to be significantly increased in-line with what the European Union does. Without measuring we cannot understand the impact or address the long-term health effects of increases to infill and the associated increase in traffic volumes, pollution and noise.

We are amazed that Councils/CAPs continue to approve childcare developments along main roads. It is totally inappropriate from both a noise and pollution perspective.

Also further adding to the problem is Councils/CAPs approving petrol stations in inappropriate locations without ensuring they have adequate petrol ventilation. A recent approval of a Woolworths petrol stations at the end of Newton Street, Nailsworth has added to both car pollution, volumes, noise and petrol fumes for residents on Newton Street and neighboring streets (the street is filled with families many with young children who regularly comment about the nasty petrol fumes as they walk on the other side of the road when walking home). Similarly an On The Run petrol station has been approved on North East Road right next to Elderly Citizens Units which will result in increased breathing problems for elderly people with any kind of chest/asthmatic/bronchial problem. More care needs to be made with deciding about the location of petrol stations.

SA could easily approve the situation by modifying requirements or sensible locations (NSW has better laws in place in relation to petrol fume extraction).

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

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

Firstly the government needs to be consistent in decision making ie don’t build a bridge over the Torrens from the Oval so people don’t have to walk down to the King Williams St Bridge or decide to build a hotel right next to the Adelaide oval so people don’t have to walk and then extend the tram so people don’t have to walk and then state that you want policy that encourages walking because they contradict each other.

Active travel opportunities need to be separated from vehicular traffic. It is the opinion of PLEG that bike lanes, should not share Major Arterial Roads with Public Transport and vehicular traffic. As traffic converges on the City of Adelaide the frequency of buses on major arterial roads, in particular, stopping for passengers to alight increases, making the bike lane an obstacle for cyclists to navigate. When cyclists use Main North Road for example instead of the footpaths they add to the traffic flow issues.
The Linear Park provides a walking/cycling path to the City and as the major arterial roads converge on the City cyclists and walkers should be ‘steered away’ from the arterial roads.

It is not just policy that needs to be an upgraded. Footpaths on Main North Road (from Regency Park to North Adelaide) need to have increased accessibility for both bike riders and pedestrians. Currently in some parts where there are bus stops the paths are not wide enough to facilitate parent with children in prams or residents with a disability.

Adding to the issue is a lack of pedestrian crossings on Main North Road. There are only two between Regency Road and Nottage Terrace.

*How can planning policy assist in balancing the tensions between prioritising the movement of vehicles (Link) and the quality of the space pedestrians (Place) along our streets?*

The only way to balance these competing needs is to develop a long term integrated transport plan that has at its center a goal to decrease the number of cars on our roads by improving the reliability of public transport (making it more frequent and more cost effect) to encourage residents who can’t ride or walk to use public transport as a viable alternative.

We can’t solve the problem by continuing to build bigger roads we have to change behavior and provide a more viable option for citizens ie have areas for citizens to park outside the city.

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

Councils and developers have to provide appropriate car park spacing with their developments instead of constantly increasing profits by lobbying not to provide off street parking under the guise that people should access to public transport. The result is residential streets being used instead for car parking. Developers continually shift their costs onto rate paying residents and create long-term issues that cannot ever be resolved.

A prime example is residents living near the Prospect Road new cinema. They are suffering daily because of cost saving measures by the developer and poor decisions made during the approval process by the City of Prospect’s CAP and lack of suitable follow up by the Prospect Council. Once the development is built recourse is very difficult for the residents living with the poor design outcomes.

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

The Building Code requires that mobility issues be addressed so why shouldn’t the PPL. Yes the code does need to address the needs of an aging population. The code also needs to address needs in relation to increasing the availability of buses that can cater for residents with mobility issues and train bus drivers to drive in a manner that minimizes the impact of taking off before older people are seated, driving too fast and
then slamming on the brakes to stop. This sort of driving places older people at risk of falls.

*How can planning policy best respond to the impact of emerging technologies on our city and communities and how we move through them?*

While it is easy to recognize new technologies, emerging, and developing technologies are often way over the horizon, and have long lead times. What is needed is a responsive planning policy platform that is being constantly updated and refined by an inbuilt discipline and responsibility.

We would like to see more public transport vehicles that embrace alternative technology such as solar or electrical vehicles.

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

This question needs to be highly qualified because of potential socio/economic issues, plus it has the ability to increase/decrease the ‘value’ of ‘different neighbourhoods’.

As in our previous statements the code needs to address the misconception that residential streets in inner suburbs are car parks for developments that have not ensured they have appropriate car parking levels allocated as part of their developments. These cost saving practices on the part of developers that are now built into zoning requirements and thus accepted by planners and Council CAPs need to be altered in the interest of mitigating all the issues currently being experienced by residents leaving near to these new developments with inadequate car parking provision.

*Will the current approach of minimum car-parking rates, with potential for discounted provisions, adequately support the desired shift toward more sustainable mobility?*

No the current minimum approach to car-parking rates will not address sustainability. All it does is shift cars onto our inner suburb streets and increases issues for the community. We need to encourage residents to car pool, use public transport, walk or cycle. However working parents often need to use their cars to drop children off at school, get to work, take children to sporting practice and other related interests such as dancing, little athletics, scouts etc which makes the use of a car unavoidable.

We desperately need a public transport integrated plan that incorporates building carparks outside the inner suburbs, whilst increasing frequency of bus services at a lower cost (incentive) to encourage a culture that stops everyone trying to drive into the city. By encouraging citizens to part drive and use public transport we could decrease traffic congestion and the time spent travelling to work.

We also need to look at more workplace friendly options – working from home.
Should the Code provide greater opportunity for low or no parking in appropriate circumstances or contemplate minimum parking rates?

None of this is going to work until we address the reliance and culture of SA drivers. We have to change the reliance on the use of motor vehicles but that will also greatly inhibit families re what they can participate in. Many people don’t work in the city and have to manage complex aspects of health problems or ageing parents etc which will not be able to be done without appropriate transport.

By having low or no parking all planning is doing is shifting the problem onto our suburban streets. The only place we could see this working is within the city itself.

Grace Fitzpatrick
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A/h- [Redacted]
M: [Redacted]
E: [Redacted]

‘Local Energy, Local Food, Local Recycling, Local Transport’