



RECEIVED
09 Nov 2018
DPTI

PO Box 44
Woodside SA 5244
Phone: 08 8408 0400
Fax: 08 8389 7440
mail@ahc.sa.gov.au
www.ahc.sa.gov.au

Direct line: [REDACTED]
File Ref: 10.85.3 03.64.2
OC18/

9 November 2018

Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5001

Email: DPTI.PlanningEngagement@sa.gov.au

Dear Sir/Madam

Adelaide Hills Council Submission on the Integrated Movement Systems Policy Discussion Paper

Adelaide Hills Council is grateful for the opportunity to provide feedback on the Integrated Movement Systems Policy Discussion Paper released for community consultation by the State Planning Commission on 23 August 2018.

In preparing this submission a comprehensive review of the Discussion Paper was undertaken including consultation with relevant Council Members and staff.

We wish to highlight that among those consulted there was a strong feeling that the policies have a Metropolitan Adelaide focus, with limited reference to their applicability to peri-urban and rural areas. Suggested changes to pick up this point have been made below and in the Comment Table & Responses to Discussion Questions provided in **Enclosure A**.

Support of Intent of Policy Discussion Paper

At the outset Council would like to acknowledge that the Integrated Movement Systems Policy Discussion Paper provides a good platform for a better integrated planning system and is a useful instrument to collate emerging issues facing South Australia, whilst providing a firm underpinning for evidence based policy creation, as supplemented by the Background Paper.

The general layout and structure of the document is considered highly legible and user friendly, and conveys complex planning issues in a simple manner. As a result the document as a whole appears well considered.

Notwithstanding, there are some themes and policy responses within the Discussion Paper which raise some questions, as outlined further below.

Summary of Issues

It is considered that the general discussion and policy responses inherently centre on Metropolitan Adelaide. It is considered that clear links to peri-urban and rural areas should be better addressed and a concerted effort should be made to update the general discussion and policy frameworks to better relate to these areas.

The level of ambition with respect to integrated movement system outcomes set by the discussion paper is commended. However, in the 'Transitioning to the Planning and Design Code' section of the discussion paper, it appears that some of this ambition is relegated to Gen 1 or Gen 2 reform phases. It is considered that this reform process presents a unique opportunity to fast track policy with an existing relevant evidence base or established data set into the transition ready phase. One such example is the Bike Direct cycling networks (Data SA – Dataset Number 942). While transitioning the baseline system across is critical to a smooth transition, it is considered that the opportunity to take more ambitious policy steps and seize the chance to make a lasting impact on the new system from the day the Code is operational should be fully realised.

Further, with respect to the 'Transitioning to the Planning and Design Code' timing structure, there are some questions regarding what 'Reform Gen 1' and 'Reform Gen 2 and beyond' mean in real terms. Again some of the policy responses that fall under this timing structure are critical to advancing Greater Metropolitan Adelaide as a modern and competitive region, and there is concern that if these changes are not captured early in the reform process that their momentum might be lost. Clarification is therefore sought regarding how the terms such as Reform (Gen 1) should be defined, whether there is any statutory function to ensuring their implementation and what this means in relation to the timescale of reforms.

In addition, the Adelaide Hills Council has interest in a wide range of proposed or tabled strategic transport related projects that are relevant to our regional context, including but not limited to:

- A third lane for the South Eastern Freeway, including a Stirling on ramp extension and the Verdun/Hanhdorf Overpass project
- Improving freight networks, including integration with the proposed Globelink freight corridor, and
- Public transport service improvements, including exploring a passenger train from Mount Barker via Stirling, a Transport Interchange at Verdun and improved and additional park and ride opportunities.

Council would like to understand where these projects fit within the Discussion Paper context and how the strategic framework moving forward will ensure these issues are acknowledged in the transition to the Code.

For a comprehensive review of policy responses and timing under the 'Transitioning to the Planning and Design Code' section of the Discussion Paper, including additional comments and responses to discussion questions, please refer to the Comments Table & Response to Discussion Questions provided as **Enclosure A**.

Additional Comments

In addition to the points raised above and in the attachment, several other issues have been raised during the review of the Discussion Paper that are worthy of mention and should form part of a

broader regional framework with respect to Integrated Movement Systems. A summary of these issues is provided below:

- Passing Bays and possible future widening of Onkaparinga Valley Road – As one of the key north south linkages through the Adelaide Hills, there is limited opportunity to pass slower vehicles between Verdun and Birdwood, this equates to a 30km trip in one direction. The lack of safe opportunities to overtake slower vehicles, significantly increases travel times for commuters and freight on this road.
- Glen Osmond Road bottle neck and right turn issues – With a large portion of the Adelaide Hills population commuting to Adelaide for work, and an increase population forecast for Mount Barker, there is genuine concern with regard to the impact of increased traffic congestion on the South Eastern Freeway. In particular, this is most concerning between the tollgate and South Parklands along Glen Osmond Road, particularly where right hand turning is allowed in both directions during peak hour. In addition, the capacity of Glen Osmond Road to carry additional vehicle movements is also questioned in the long term.
- Balancing Freight Movements with Scenic Route Amenity – While the importance of freight movement within the Council area is critically important for primary production and industry sectors, the Council is very much in support of balancing movement with place amenity outcomes. The Discussion Paper has certainly raised this issue, and we would like to work with DPTI to consider what type of policy framework could be established to respond appropriately to these competing issues.

Although potentially outside the scope of this Paper, Council would like to understand where these types of issues fit within the integrated movement system context and how the broader strategic framework moving forward will ensure these projects are acknowledged in the transition to the Code.

Summary

In summary, the Adelaide Hills Council is supportive of the policy framework presented in the Integrated Movement Systems Discussion Paper and looks forward to working with the Commission to unpack these issues further and having suggestions as tabled in this submission reviewed and included where appropriate in the Planning and Design Code.

If you have any queries regarding the above comments then please do not hesitate to contact Marc Salver, Director Development and Regulatory Services on [REDACTED].

Yours sincerely



Andrew Aitken
Chief Executive Officer

Enc: Appendix A – Adelaide Hills Council - Comment Table and Response to Discussion Questions
-Integrated Movement Systems Policy Discussion Paper

Adelaide Hills Council
Comments Table & Response to Discussion Questions
Integrated Movement Systems
Policy Discussion Paper

Theme 1: Aligning SA's growth with Transport Infrastructure

Ref No.	Key Opportunities and Challenges	Proposed Response	Proposed Timing	Council Comments
1A	<p>In 2012, a suite of higher density, mixed use zones were introduced into the SA Planning Policy Library (SAPPL) which have been spatially applied to a small number of areas adjacent to key transport corridors and centres.</p> <p>These zones help to integrate land use and transport systems and can provide the foundation for this outcome in the new planning system.</p>	<p>Transition zones that promote improved integration of land use with major transport corridors (for example: Urban Corridor Zone, Urban Core Zone, Residential High Density Zones and Mixed Use Zones).</p> <p>The spatial application of these zones is unlikely to be substantially changed as part of the application of Generation 1 (Gen 1) of the Code.</p>	✓ Transition Ready	Council generally supports the proposed response and timing.
1B	<p>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.</p>	<p>Review the inclusion of minimum net residential densities in Suburban Neighbourhood Zones, Urban Core Zones, Urban Corridor Zones and Suburban Activity Node Zones.</p> <p>Further discussion and consultation needs to be undertaken to identify the appropriate net residential densities in the context of evolving demographics, market dynamics and development.</p>	Reform (Gen 1)	<p>Council generally supports the proposed response and timing.</p> <p>Note: It would appear that Overlays could be harnessed as a tool to identify a defined catchment area for targeted minimum net residential densities around centres.</p>
1C	<p>Some transport corridors are currently underutilised and could benefit from better integration with supporting land uses.</p>	<p>Investigate the spatial application of higher density mixed-use zones (such as those listed above) along appropriate key transport corridors, adjacent activity centres, in urban renewal areas and key strategic sites.</p>	Reform (Commence Gen 1)	As indicated above there would be support for this approach in Generation 1 of the Code.

Theme 1 – Discussion Questions

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

It is considered proven in the urban context that consolidating population bases around public transport infrastructure creates demand for services. In regional or peri-urban contexts creating economies of scale is a much harder proposition, due to settlement patterns and low density population bases. This fundamental issue is difficult to overcome with any existing policy tools.

One suggestion is that the Code may be able to provide tactical guidance in this regard, for example an Overlay could be developed that represents a catchment area for any given key public transport stop or interchange within a locality. When the population within the catchment area passes a certain threshold it could then trigger a review of the service provision to that area. This scenario imagines a highly evolved level of integration under the new system, including linking ABS data with dwelling approval data etc. and could include automation of service review processes within DPTI to ensure a responsive and adaptive system.

Regardless of the type of strategy adopted to respond to the differences in public transport availability, it is considered that the Code would have a limited ability to address the fundamental issue, particularly where infill development is restricted, as is the case throughout the Adelaide Hills Council. In addition, it is not considered the direct role of planning to address public transport availability.

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

It is considered that the policy needs to articulate the reasons for higher density development in a compelling manner, this could be achieved by humanising the objectives from a social and economic perspective (i.e. housing affordability opportunities for first homebuyers and downsizers and viable centres and service provision for the community). Then the policy needs to ensure that it humanises the design of the actual development, with liveability at the forefront. The Office for Design and Architecture SA have done extensive work in this area, in particular their [Principles of Good Design](#) document focuses on how buildings and places can meet the needs of the people who use them.

3 *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?*

It is considered that the recent Ministerial DPA – Inner and Middle Metropolitan Corridor (Design) gazetted 19 December 2017, went some way to addressing concern for design outcomes and impacts of higher density development and it seems only logical that promoting good design outcomes through incentivisation be offered in a comprehensive manner. How this is addressed specifically with respect to car parking is a difficult proposition and it requires broader change at the behavioural and community perception level as much as innovative policy, coupled with improved public transport outcomes.

Theme 2: Capitalising on Strategic Infrastructure

Ref No.	Key Opportunities and Challenges	Proposed Response	Proposed Timing	Council Comments
2.1 Strategic Transport Facilities				
2A	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.	Transition the policy intent of the Airfield Zone and review the permissible uses in these zones to better support complementary development types. <i>Work with Adelaide Airport Limited, City of West Torrens and other stakeholders within the vicinity of strategic airports</i>	✓ Transition Ready	Limited relevance to the AHC, however in principle support is offered.
2B	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.	Review and Transition the Intermodal Policy Area into the equivalent zone.	✓ Transition Ready	Council generally support the proposed response and timing.
2C	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.	Review the SAPPL building near airfields and building heights policies and mapping to respond to the NASF Guidelines.	Reform (Gen 1)	Limited relevance to the AHC, however in principle support is offered. It is considered that Overlays would play a critical part in identifying areas subject to airport safety guidelines.
2D	Protecting ports from encroachment from incompatible land uses is becoming increasingly important to protect their current operations, critical transport links and future expansion opportunities.	Review the range of zones and policy areas that apply to seaports and supporting infrastructure to ensure that policy is fit for purpose.	Reform (Gen 1)	No relevance to the AHC, however in principle support is offered.

2.2 Strategic Transport Corridors				
2E	Currently, the spatial extent of land required for future road widening requirements is not included in Development Plans.	Work with DPTI Transport to review transition and map road widening provisions and investigate whether they can be incorporated as an overlay or similar in the Code.	✓ Transition Ready	There is support for increased clarity and precision regarding road widening, particularly from a Development Assessment perspective and the community more generally. As such this proposed response and associated timing is supported.
2F	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.	<p>Transition the Policy intent of the existing strategic Transport Routes Overlay. This will involve:</p> <ul style="list-style-type: none"> • reviewing policy and mapping for strategic transport corridors • refining policy (where required) with regard to access requirements freight routes and road hierarchy. <p>Targeted consultation with affected stakeholders plus general engagement as part of the Code development.</p>	Reform (Gen 1)	<p>Council generally supports the proposed response and timing.</p> <p>Note: Regional Plans or overlays should identify links with existing or future infrastructure plans/projects i.e. Regional Bridge Upgrade Program, Lobethal Freight Access upgrade, Globelink Freight Bypass etc.</p>

Theme 2 – Discussion Questions

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

It is considered that planning policy can influence design measures that assist in mitigating impacts of these facilities, for example the Code could discourage sensitive uses within dwellings, or higher density forms of residential accommodation where these are located within flight paths or close to airports. Alternatively, if such development is to be permitted in such areas, then the Code should require use of building material or construction measures that have proven noise attenuation outcomes, and this scenario would need to be coupled with Building Code considerations and requirements.

In addition, an overlay identifying locations severely impacted by airport noise would be a useful tool in raising awareness to the issue and to assist with mitigation depending on the level of impact, with a subsequent Ministers Specification providing further guidance.

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

It is considered that a response to this matter could be judged on a case by case basis and would be subject to a detailed analysis. As such it is considered that the Code's function needs only to flag the potential for impacts, with the onus to address these being the responsibility of the proponent of any development.

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

It is considered that there may be opportunity for the Code to flag the need to investigate ambient parameters for noise and air pollution where a sensitive development is being proposed adjacent to high noise or potential polluting activities. This could be integrated with Noise & Emissions Overlays and possible opportunities for smart city sensors, particularly in highly sensitive locations, such as where a major transport route intersects with a main street.

How this information is applied and to who's benefit is difficult to quantify, but it could provide a means to consider appropriate responses for both the road user and administrator (i.e. encourage alternative routes for heavy vehicles) and sensitive development (i.e. mitigation measures through design and construction measures) much like the framework set by Minister's Specification SA 78B for the Construction Requirements for the Control of External Sound requires at present but with additional application and function.

Theme 3: Sustainable Mobility, Car Parking & the Impact of Tech

Ref No.	Key Opportunities and Challenges	Proposed Response	Proposed Timing	Council Comments
3.1 Walking, cycling and other non-motorised transport				
3A	The current walking and cycling SAPPL policy is well placed to be transitioned into the Code.	Transition the SAPPL off-street bicycle parking and the end-of-trip facilities (such as showers, changing facilities and clothes storage).	✓ Transition Ready	Council generally supports the proposed response and timing.
3B	Cycling routes are not universally incorporated into Development Plans. This leads to inconsistency of application of design rules etc. relating to cycling.	Incorporate identified cycling routes into the Code.	Reform (Gen 1)	There is general support for the proposed response, however given that the Bike Direct Network (Data SA - Dataset Number 942) provides reasonably up to date mapping on cycle networks throughout metropolitan Adelaide, it is considered that the timing of this could be fast tracked.
3.2 Car parking and emerging mobility technology				
3C	As travel behaviours continue to change, the demand for car parking will also change. It is important that new buildings and structures, particularly multi-level car parks, are adaptable for future uses.	Transition the existing SAPPL policy on the design of car parking structures so they are adaptable for new uses in the future.	✓ Transition Ready	Council generally supports the proposed response and timing.
3D	Car parking rates in current planning policy are often inflexible and do not consider innovative design or proximity to other transport options.	Rationalise and transition existing car parking rate policies which allow for variation to prescribed minimum parking rates for development proposals which satisfy specific design and transport option criteria.	✓ Transition Ready	General support for proposed response, where such a response has proven to be effective i.e. when applied to activity centres and mixed use/higher density development.

3E	There is potential for greater standardisation of car parking rates, while still allowing for different rates for conditional and geographical contexts.	Review and consult on car parking rates in Greater Adelaide and regional centres to identify opportunities for greater standardisation through the Code, where appropriate.	Reform (Gen 1)	In general, standardisation of this policy is supported, however it is considered that thorough analysis would be required to ensure that any response is adaptive to local circumstances. For example in the Adelaide Hills we have low density residential development and high levels of car dependency. As a result, business centres will need to cater for higher numbers of car parks compared to metropolitan Adelaide centres that may be well serviced by population clusters and public transport services. As such the timing of this response is supported to allow for proper investigation of how policy could respond to these differences and challenges.
3F	Planning policy has a role to play in encouraging and supporting the uptake of technology which helps future-proof our neighbourhoods.	Develop policy that encourages new developments, in higher density or mixed use zones, to incorporate electric vehicle charging provisions and ensure appropriate infrastructure is in place.	Reform (Gen 1)	There is general support for the proposed response, however given the likelihood of a rapid uptake of electronic vehicles in the coming years, it is considered that the timing of this response could be fast tracked.
3G	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.	Develop policy for new car parking areas (of a certain size) which encourages the adoption of technologies which can better manage impacts.	Reform (Gen 2 and beyond)	There is general support for this response, however given the rapid emergence of Smart City technology and the likely economic, social and environmental advantages it provides, it is considered that the timing of this response could be fast tracked.

Theme 3 – Discussion Questions

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

It is considered that this outcome is most effectively achieved at the master planning phase. Notwithstanding this, there would appear to be opportunities to use Overlays to identify strategic walking and cycling networks (Bike Direct Network) and use Regional Plans to set a higher strategic framework for achieving such outcomes.

In addition, end of trip facilities and adequate storage is a key component to encouraging increased active travel.

2 *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?*

It is considered that planning policy could assist in balancing these tensions by setting parameters for appropriate widths of footpaths with incentives offered for development that adds to the public realm at street level, via activation, publicly accessible forecourt areas or pathways, particularly where they draw pedestrians away from the harsh interface of the road (Link). A focus on corner activation (side street) particularly along arterial roads could be another measure to improve place based outcomes for existing activity centres adjacent arterial roads.

In addition, there may also be opportunity to create a 'footpath widening' overlay, particularly in areas with existing or strategic economic or social advantages such as high streets or main streets, ensuring any upgrades give consideration to increasing the separation between pedestrians and the road interface.

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

The Code could promote these outcomes through urban design measures e.g. encouraging retail development to be setback an additional distance from the property boundary to encourage dining opportunities, or other activation measures such as outdoor servery windows.

The ACC's [Adelaide Design Manual](#) and ODASA's [Good Design for Great Neighbourhoods and Places](#) provides a strong starting point for any Code development seeking to achieve positive public realm outcomes in this regard.

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

It is considered that good universal design for any development is critical in achieving a successful movement system framework. As such the adaptability of existing footpaths and shared paths to accommodate these types of vehicles should be considered through Code and Overlay development.

5 *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?*

It is considered that planning policy needs to encourage adaptability through design, for example a multi-tiered car park within a mixed use buildings should be able to be adapted to another use should demand for private vehicle car parking substantially reduce in the future. A flexible policy approach would need to encourage an adaptable outcome, but also be flexible in facilitating such change.

With respect to emerging technology in the smart city space, it would be encouraging for the Code to make reference to the importance of its implementation, even if it's at the intent or objective level. In addition this could also be encouraged with respect to electronic vehicle charging points.

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

It is considered that moving to a more criteria and performance based approach could assist in creating a more adaptive framework. In addition, it is considered that high density development would require additional on street car parking, to offset any proposed on site shortfalls.

Consideration as to how this has played out in Tonsley, Lightview and Bowden should form the basis for analysis and an appropriate response.

7 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?

It is considered that the current approach has resulted in cumulative negative impacts in some cases that have created instances of unfair advantage for developers and caused undue angst within the community.

A common issue being that the first high density development within an area may be offered some level of dispensation with respect to car parking rates where off-site car parking capacity has the ability to absorb the shortfall. However, as the area continues to develop, there may be similar levels of lenience offered toward car parking to stimulate investment resulting in subsequent off-site parking deficiencies and negative impacts on the surrounding communities. Inevitably new development will experience tightening of the minimum car parking rates and fewer leniencies offered. The issue is twofold in that it creates disadvantage for developers over time and inconsistencies in approach which in turn result in disenfranchising the surrounding community.

This is another fundamental issue that is difficult to overcome. Therefore all possible options should be considered with any change approached with caution and widespread consultation that builds on previous consultation in this space.