Natural Resources and Environment Discussion Paper & Integrated Movement Discussion Paper

Submission

November 2018

1. Introduction

The Local Government Association of South Australia (LGA) welcomes the opportunity to provide a response on the following two documents:

- Natural Resources and Environment Policy Discussion Paper; and
- Integrated Movement Systems Policy Discussion Paper.

The LGA has consulted with local government and held a briefing session with local government planning representatives to assist in the development of the submission.

The LGA appreciates the opportunity to provide comment on these important documents which will have a significant bearing on the preparation of the Planning and Design Code.

The LGA notes from the Discussion Papers that a series of papers are to be developed to 'stimulate thought around the policy direction for the Code'. It is understood that two further Discussion Papers are yet to be released, these being "People and Neighbourhoods" and "Productive Economy" and that all four Discussion Papers are 'intended to be read and considered as a family' (page 7 of discussion papers). We note that the Productive Economy Discussion Paper has only recently been released for consultation and the People and Neighbourhoods Discussion Paper will not be made available until early 2019.

Noting that the Discussion Papers provide an outline of timing and scope of the Commission's intended program for transitioning the 72 Development Plans into the Planning and Design Code, and based on the current Planning Reform Calendar, it is understood that engagement on the Planning and Design Code will commence in February 2019. The LGA is concerned that any engagement on the remaining two Discussion Papers may not be meaningful and may not be used in the drafting of the Code.

Notwithstanding the concerns raised above, the LGA considers the current two Discussion Papers to be clear and well expressed. The format enables a clear understanding of the current position and the proposed approach to transitioning to the Planning and Design Code.

Natural Resources and Environment Policy Discussion Paper

Theme	Question	Response to Questions
Sustainable and Liveable Urban Environments		
Green Infrastructure and Water Sensitive Urban Design	**Should existing WSUD and GI policies also apply to regional areas and for all development scales and types?**	Prior to responding to the question of whether existing WSUD and GI policies should be applied to regional areas for all development scales and type, it is suggested that there is also a need for greater consistency across metropolitan areas.
		There are many regional areas that could benefit from better WSUD and GI practices, such as to support the revitalisation of both main and residential streets and regional centres, making towns more inviting, creating new or improved places for people and communities to gather and interact, and encouraging more sustainable modes of travel.
		Indeed, there are some comparable smaller settlements and towns within the Greater Adelaide Region that would be comparable to settlements in regional areas. Current policies are not sufficiently strong to facilitate a full exploration of the benefits of WSUD and GI in metropolitan areas. This means WSUD and GI policies remain largely untested in the types of areas prevalent in the regions.
		The LGA would support the review and refinement of existing WSUD policy in urban areas (1A) and for higher density mixed use zones in metropolitan Adelaide (1B) if research and testing was undertaken to evaluate the success of these policies and how they can be appropriately applied across all areas where there may be benefits.
		The LGA believes more work may be required to ensure these policies are 'transition ready', as there will be a missed opportunity to strengthen

		metropolitan outcomes if existing policies are simply transitioned. Regional areas with similar challenges could also be included in research/ testing.
		With regard to theme 1C of the Paper, the LGA agrees that inconsistencies should be ameliorated and that infill developments should be considered for inclusion in any subsequent updated policy. However, this is caveated by the requirement for evidenced based policy making, through research and testing.
		While the approach suggested in theme 1D of the Paper is supported in principle, where public land is to be used for WSUD and GI, issues including the ongoing cost of management and maintenance need to be considered.
		The issue of whether WSUD provision on public land is part of the open space provision or infrastructure provision also needs to be reviewed.
Energy Efficient Design	**What role should the planning system play regarding preservation of sunlight to solar panels from adjacent development?**	Overshadowing of adjoining properties and resultant loss of solar access is becoming a significant concern in many metropolitan council areas as infill development occurs.
		The planning system can and should play a significant role regarding the preservation of sunlight to adjoining properties and liveable spaces, as well as to solar panels on adjacent buildings if the panels cannot be re-sited to provide the same benefits to adjacent land owners.
		Policy should encourage owners to consider the proposed position of solar panels having regard to potential future over shadowing, based on permitted neighbouring building heights.
	Should the Code introduce incentives for development that can incorporate passive solar (siting) techniques, green infrastructure and WSUD?	The Code should introduce incentives for developments that can incorporate passive solar design techniques, but with regard to theme 1E of the Paper, the energy efficiency objectives in the SAPPL could be improved significantly and would have to be improved to support criteria for incentives.
		While it is noted that policies relating to energy efficient design currently exist, there is room to improve these policies through the Generation 1 reform.

		Energy efficient design requires an integrated approach to solar gain, access to daylight, insulation, thermal materials, ventilation, heating and control systems. These aspects should be considered in relation to each other which could mean a breakdown of the current objectives in the SAPPL into separate but related policies (with supported building code requirements) relating to the aspects noted above. Indeed, many development plans have detailed policies relating to how energy efficiency can be maximised, and these need to be supported by the code.
		Additional policies should also be considered to align passive design and technologies with WSUD and GI objectives. The linkages between passive design, WSUD and GI should also be made explicit in the Code.
		Energy efficiency can be delivered through both the Building Code and Planning and Design. The Planning and Design Code should encourage all buildings including non-residential buildings to be as energy efficient as possible.
		Reforms would need to consider a hierarchy with regard to non- residential buildings, which would require research and testing to shape definitions and define thresholds for different buildings, uses and design aspects.
		With regard to theme 1G of the Paper, the comments above support the aim of achieving better sustainable design. Developing policies to promote community shared energy facilities are currently non-existent, but the LGA would support the development of policies to promote community level energy generation, distribution and storage schemes.
	How can planning policy contribute to reduced carbon emissions from the built environment sector?	There is potential through the planning system to support the reduction of carbon emissions while providing financial and energy savings, for example, through improving building energy efficiency and infrastructure provision, influencing community economic development opportunities and investment in renewable energy generation.
		To be able to measure how developments are contributing to reducing carbon

		emissions compared to business as usual an assessment tool should be used, such as the Built Environment Sustainability Scorecard (BESS) used by councils in Victoria. This also encourages applicants to assess the suite of measures they could use that would best suite their development.
Waste Management	**How do we plan for current waste removal practices and technologies and provide flexibility for innovative future solutions?**	The Planning and Design Code should reference the "South Australia Better Practice Guide Waste Management for Residential and Mixed Use Developments." Waste and recycling collection is an essential, ongoing service. Increasing urban densities will see changes to collection approaches with more shared bin services. These services need to be well managed in order to reduce contamination of recyclables, and be orderly and economic.
Water Security and Quality		
Mount Lofty Ranges Water Protection Area and other Water Protection Areas	**Should dams be assessed as development in the planning system?**	The LGA understands that the Department of Environment and Water is developing a discussion paper for consultation in relation to both dams and levee banks. This work arises from the Burns Report following the 2016 flooding north of Adelaide. The LGA recommends the results of this consultation be considered as part of DPTI's decision making process.
River Murray	**Should we instead use the 1956 flood data as indicator of the flood risk?**	The LGA supports DPTI working with River Murray councils in responding to this question. It is noted that since the 1956 flood, the River Murray has been heavily modified along its length with weir structures, irrigation and water taking having a substantial impact on river levels. As a result of these modifications, the 1956 level may no longer be of relevance.
Biodiversity	**Can the Code protect biodiversity in areas not**	The definition of landscapes in the current NRM Act only includes natural landscapes. There is a large body of research to suggest that 'cultural

	identified as native vegetation and in modified landscapes with biodiversity values?	landscapes' are also crucially important to well-functioning natural resource management systems, but this also strongly applies to the built and natural environment.
		Cultural landscapes are landscapes impacted by the activities of people e.g. the aesthetically-pleasing landscapes of the vineyards of McLaren Vale. Important cultural landscapes in SA include the Mount Lofty Ranges (currently the subject of a National Heritage Listing nomination under the EPBC Act, also potentially World Heritage Listing) and the Adelaide Park Lands (which form part of the National Heritage Listed 'Adelaide Park Lands and City Layout').
		These places are important to many local councils (for example, the Mt Lofty Ranges World Heritage Bid includes 10 councils as partners): http://www.mountloftyranges.org/. The definition of landscapes as only including natural landscapes causes misunderstanding and undervalues the importance of cultural landscapes.
		The Code should include overlays or policies related to cultural landscapes- again, this should be done based on research and testing and to ensure evidence based policy making. One area for deliberation would be to develop a definition for what types of areas constitute a 'cultural landscape'.
	Can planning policies assess the cumulative impacts of development on biodiversity?	Impacts on biodiversity accumulate in multiple ways. For example, impacts may accumulate on individual sites due to the effect of multiple stressors of habitat fragmentation, noise, and pollution. Over larger, heterogeneous environments, individual or multiple impacts may accumulate spatially as an impact footprint expands under multiple developments, changing habitat extent and connectivity.
		The only way to effectively predict and reduce cumulative impacts in a planning system is to ensure proper environmental impact/ ecological studies are undertaken and that the outcomes of the studies are taken seriously in a

		decision on whether to allow development. These studies may include spatial or strategic environmental impacts depending on the way in which other developments have already impacted biodiversity. In addition to policy, triggers will be required in legislation and regulations for environmental (or other) assessments to be required on a greater number of development types than is currently prescribed, with the aim of protecting biodiversity. Tweaks may also be required for spatial/ strategic studies to become a requirement. With regard to theme 3D, protecting biodiversity on land adjacent to nature protection areas does not go far enough, and greater policy development/ commitment to study will be required to fully assess cumulative effects of development/s
	Can planning policies play a role in protecting and encouraging backyard biodiversity?	There is scope for landscaping conditions to be placed on developments that incorporate shared open spaces. In these instances, planting palettes would need to be developed and attached to planning consents. It would be difficult to prescribe the types of plants used in outdoor areas for private open space. However, many councils have already teamed up with organisations such as SA Indigenous Flora and NRM Boards to produce guidelines and booklets that guide backyard biodiversity. The State Government (through the planning system) could certainly build on these efforts by encouraging backyard biodiversity through design guidelines, documents and fact sheets that inform applicants of their choices and social obligations to support biodiversity in their local communities.
	Do we need a policy to protect and encourage development of roadside vegetation?	Councils are responsible, under the Local Government Act 1999, for approximately 75,000 kilometres of roads. While the Commissioner of Highways controls and maintains the trafficable section of major arterial roads

		under the Highways Act 1926, local councils are responsible for the remainder of the road reserve, including the roadside vegetation, as well as all other roads within their district.
		The growing road network and increasing maintenance requirements of existing roadside vegetation places significant strain on council budgets and this issue can often become contentious as assets such as roads are 'gifted' to councils from State Government and private developers.
		From this perspective, the LGA would not support further regulatory controls placed on councils with regard to how they should manage roadside vegetation.
		That said, road reserves generally support vegetation, notable for flora and fauna conservation, and in many situations these reserves contain the last remaining fragments of remnant native vegetation. However, native vegetation (including roadside vegetation) is protected under the Native Vegetation Act 1991, and associated regulations and guidelines.
		With regard to themes 3A-3E, the LGA generally agrees on the key opportunities and challenges and supports the proposed responses. However, it is concerning that many crucial amendments to policies, zones, mapping and definitions may not be considered before transition to the Code, even though the issues have been identified.
		Consideration should also be given to referencing the Native Vegetation Councils Guidelines for the Management of Native Vegetation which are currently being consulted on.

Coastal Environments	What level of development (including accommodation) is appropriate for a Coastal Conservation Zone?	This is entirely dependent on the local conditions. A proper system of Integrated Coastal Zone Management (ICZM) is required in South Australia, as it is internationally recognised as best practice for managing coastal issues as part of a framework involving all stakeholders for all potential uses along the coast.
		The overarching aim of ICZM is to achieve sustainability and this is not limited to environmental sustainability. ICZM seeks to achieve the best possible outcomes for both large-scale and local-scale issues concerning local communities, the environment and the economy.
		It guides the process of information collection, planning decision-making, management and monitoring of implementation. Using such a framework would greatly assist in determining what development is appropriate and where.
		Current experience of assessing development in Coastal Conservation Zones has shown that a blanket set of policies is not effective in considering local site conditions in a balanced manner. This has led to inappropriate development being allowed in some areas, and appropriate development applications being refused in some areas (but more so that inappropriate development has been allowed).
		This issue can be overcome by putting a hierarchical framework of policies within the Code that can consider specific attributes in more detail, or through splitting the current Coastal Conservation Zones into a series of other more detailed zones. ICZM is the ultimate solution that may not be achievable under current conditions, but as many elements as possible should be transitioned to the Code for coastal management.
	Does current planning policy adequately address the risk of new development from climate change impacts (coastal retreat,	This question has been answered by the key opportunities that have been outlined in the table in terms of issues with interpretation, overlaps in definitions, lack of consistency, poor mapping/ overlays, the need for better policies to build resilience to the impacts of climate change, lack of clarity and

	sea level rise and storm surges etc.) for at risk coastal settlements?	a lack of risk assessment.
		Current planning policy does not adequately address the risk of new development from climate change impacts and for at risk existing settlements.
		The Federal Government acknowledges that climate change brings significant risks to the coastal zone and this sentiment is mirrored by the advice of the Coast Protection Board. The LGA has produced a number of guidelines for councils to utilise in their coastal adaptation planning processes, so the types of risks and the magnitude of the issue is well known across all tiers of government.
		The issue is determining the best way for the planning system to assist in improving coastal zone management. This may be bigger than policies in a Code. For example, in South Australia, there is no coast-wide strategy for coastal management/ risk issues. This is one of the reasons why current SAPPL coastal policy requires significant review and update, because policy has been made fractionally instead of holistically.
		Without clear spatial strategies, there cannot be effective planning policies to tackle current risks and properly predict risks associated with proposed new developments/ settlements.
Natural Hazards	How can we better integrate council owned flood data with the new Code and achieve consistency?	Better integration of flood mapping has occurred through Creative Commons Licencing and making flood studies publicly availability on (Australian Flood Resources Information Portal (AFRIP).
		In 2016 the LGA contacted all councils on behalf of the Australian Government in reference to flood studies undertaken or procured by councils. The Federal Government has sought to make flood studies accessible through the Australian Flood Resources Information Portal (AFRIP), and make them legally reusable by the Australian community. To enable this to occur, councils were asked to modify copyright restrictions on these studies by consenting to the application of the Creative Commons Attribution 4.0 Licence (the CC

Licence).

The Department of Environment and Water and councils have a long history of working towards effectively sharing data on natural hazards (flooding being a large component of this).

Specific to floods, the Stormwater Management Authority (in a recent submission regarding NRM reform) observes that flooding and stormwater management roles and responsibilities make it difficult, if not impossible to manage flooding within a framework of integrated urban water management.

Roles and responsibilities are complicated by 68 councils, NRM Boards and State Government (through DEW, DPTI, EPA and SA Water) all playing a role and all having separate databases.

It is not only council owned flood data that needs to be integrated, but all flood data across all interested parties. The hazards, coastal areas and land division general modules (in relation to theme 5A) are not considered to be transition ready, and apart from bushfire, the level of detail that is required to manage floods (or any other hazard) is not available.

With regard to theme 5B, flood mapping needs to be consistent with mapping of hazards, transition into spatial layers and overlays however, it would be prudent for DPTI to consider improving flood policy and associated mapping before transitioning what is already in the SAPPL, because climate change will not wait for a first generation reform.

With regard to theme 5B, the LGA would agree that policies/ overlays for the prevention and control of acid sulphate soils need to be improved. A number of metropolitan councils are currently developing heat island mapping, these maps should also be considered for inclusion as an overlay.

As previously stated, bushfire is the most advanced in terms of management with risk assessment tools, more accurate mapping, bushfire codes and

		building and construction requirements already in place. However, there is always room for improvement, and the LGA would support the introduction of overlays and regular updates. Themes 5C and 5D are similar to 5A, it is recommended that DPTI review flood policy and associated mapping before transitioning from the current SAPPL.
	What climate risk projections should be used? What time frame and emissions scenarios?	There are two reliable sources of climate projections for South Australia that will assist planners to understand climate risks and inform climate risk assessments, these being Climate Change in Australia (CCIA) and the SA Climate Ready (SACR) data set. Both sources of projections use a selection of Global Climate Models (GCMs) that represent a range of greenhouse gas emission and land use change scenarios described by Representative Concentration Pathways (RCPs). The CCIA dataset is a joint initiative of the Bureau of Meteorology and the Commonwealth Scientific and Industrial Research Organisation (CSIRO) and provides projections for the whole of Australia at three different levels of regionalisation. The finest level of projections are provided at the 'sub-cluster' level, with South Australia covered by the Rangelands North, Rangelands South, Southern and South-Western Flatlands East and Murray Basin sub-cluster. The SACR dataset was generated as part of a research project by the Goyder Institute for Water Research, a partnership between State Government, Commonwealth Government and research organisations. Climate projection data is available for six climate variables, from 200 weather stations across South Australia. Regional summaries have been prepared for each of the seven Natural Resources Management (NRM) Regions.

The SACR summaries generally provides projections for RCP 4.5 and RCP 8.5 scenarios for time periods centred around 2030, 2050, 2070 and 2090. The CCIA summary reports provide projections for RCP2.6, RCP 4.5 and RCP 8.5 for 2030 and 2090, although summary data for other periods can be found on the website.

While both data sets provide detailed climate change data, it is recommended that in most instances the summary data available from either source will be suitable for informing decision making within the planning framework for the use of councils. The choice of data may depend on the availability of data for the climate variables of interest, the projection timeframes and the RCPs.

Climate Change in Australia has developed a climate analogue tool that can be used by a town or locality to identify areas where the current climate is similar to their projected future climate, under three emission scenarios and three timeframes. This tool provides a simple way to communicate what the future climate will be like. For example, the climate of Port Lincoln is projected by 2090 and RCP8.5 to be similar to the current climate of Port Pirie or Wudinna.

Coast Adapt and the CRC for Spatial Information provide sources of information that can assist Councils understand potential inundation from sea level rise. Both tools can assist in preliminary (first–pass) assessments but are not suited to property scale assessments as they use bathtub or bucket-fill inundation predictions which assume that sea level rise of 1m (for example) will inundate all land at or below 1m above current sea level. These models do not consider local factors such as structures, coastal erosion and coast protection infrastructure.

The Coast Adapt website provides sea level rise and inundation information for all Australian coastal Councils. It also provides a links to the coastal geomorphology dataset smartline which maps shoreline erodibility. The inundation mapping shows model outputs for 2050 and 2100, with two greenhouse gas concentration scenarios.

		A coastal risk mapping tool (Coastal Risk Australia 2100) has been developed by the CRC for Spatial Information. The tool allows users to investigate projected sea level rise and storm surge scenarios for their locality. This tool enables a range of inundation scenarios for 2100 to be assessed relating to emissions scenarios (low, medium and high) and can be manually set to provide any height of sea level rise (above mean sea level).
	Should flood risk categories be based on physical (depth and velocity) and function and isolation risk factors?	Reference should be made to the Australian Disaster Resilience Handbook. Flood hazard is generally quantified by considering the flood depth and velocity in combination. When quantifying and classifying flood hazard, it is important to understand the relative degree of hazard and the underlying flood behaviour causing the hazard (e.g. high depth, high velocity, depth and velocity combined), as these may require different management approaches. Where the site under consideration is small, flood behaviour is relatively uniform, and a simplified method has been used to quantify the flood behaviour on the floodplain, it may be that a single point value of depth and velocity) is appropriate. However, in cases where there is significant variability in the flood behaviour across the floodplain, a map of flood hazard assessing the spatial variability of flood hazard is more appropriate. In addition, climate projections and modelling may also contribute to identifying trends that may reduce the variability. The answer with regard to the Code may be to develop a hierarchy of policies and associated policies based on mapping, data and risk assessment across a range of scenarios.
Environment Protection and Public Health		

Interface including noise and air emissions	Should cumulative noise impact assessments be undertaken as part of the development assessment process?	Planning policy should consider cumulative impacts, particularly in relation to mixed uses zones or where higher densities are being considered. Separation distances between incompatible or sensitive land uses need to be considered as a planning tool in the Planning and Design Code.
	How can policy effectively address the interface between land uses and zones promoting mixed land use?	Consideration of how policies are spatially applied will be of high importance as will land use definitions.

The spatial application of higher density mixed-uses zones along key transport corridors need to be considered in the context of managing health concerns (noise and air quality issues) |

Integrated Movement Systems Policy Discussion Paper

Theme	Question	Responses to Questions
Aligning South Australia's growth and transport infrastructure	**How can the Code better respond to the differences in public transport availability in urban and regional communities?**	It is important that the productive potential of freight routes are realised. Bottle necks and pinch points on local roads increase the time it takes for freight to travel from sender to receiver. This first/last mile problem is a result of the local road network not being at the same standard as the major arterial road network.
	What other policy provisions are needed to facilitate good quality development that supports the desired minimum residential densities in key zones?	More efficient transport routes connecting local businesses to national and global markets can help create a more successful and prosperous economy within both metropolitan and regional areas.
	Does existing policy within the SAPPL adequately address issues relating to the perceived quality and impacts of higher density development?	In aligning commercial and industrial areas with transport infrastructure, whether road, rail or ports (air and sea), last mile and first mile concerns need to be considered and addressed.
	How might targeted policy reform promote or incentivise better outcomes?	
Capitalising on strategic transport infrastructure		
Strategic Transport Facilities	**How should planning policy balance the need for airports in strategic locations against the impacts of these facilities on adjacent land owners?**	Adelaide Airport both impacts on, and is impacted by the surrounding urban environment. Adelaide Airport is exposed to impacts as a result of increased infill development resulting in increased stormwater runoff. Mapping undertaken by the NRM Board has identified that the airport site is subject to flooding which could impact on airport operations.

Strategic Transport Corridors	How can the Code work to protect the operations of major transport facilities whilst managing the impacts on adjacent development opportunities?	There is the potential to include B-double routes in addition to strategic transport routes on overlays within the Planning and Design Code.
	How can planning policy better manage and minimise the impacts of transport corridors on surrounding development?	The difficulty exists in that current vehicles create noise and air pollution which have a detrimental impact on surrounding properties. As we move to electric and other fuel driven vehicles the likelihood will be that both noise and air pollution will be reduced.
Sustainable mobility, car parking and impact of technology		
Walking, cycling and other non- motorised transport	How can planning policy better enable delivery of more walking, cycling and active travel opportunities in our neighbourhoods?	The proposed approach to improve planning policy to better enable the delivery of more walking, cycling and active travel is supported. There is opportunity for the Planning and Design Code to include provision in new areas or brownfield sites to include improved provisions for pedestrians, cyclists and elderly persons (gophers etc).
	How can planning policy assist in balancing the tensions between prioritising the movement of vehicles and the quality of the space for pedestrians?	Current planning policy in urban areas is encouraging increased densities and reduced car use. With these increased densities and reduced areas of private open space the public realm takes on greater importance. Increased pedestrian movement and more active use of footpaths (outdoor dining) suggests the need for wider footpaths and greater opportunities for on street landscaping and street trees.
	How can the Code promote development that contribute positively to streets and the serviceability and quality of the public realm?	Planning policy will need to recognise and incorporate Smart Cities thinking and the technology associated with it. Smart Cities technology, including autonomous vehicles, smart parking and street lighting, will change the function and design of urban streets. Future policy needs to support rather than hinder these approaches.

	Does the Code need to more explicitly anticipate the needs of an ageing population through provision for things like mobility scooters or access vehicles?	Recognising that the State's population is ageing, it is important that the Planning and Design Code gives consideration to the ageing population. It is also as important to give equal consideration to persons with disabilities.
		The importance of good design in the public realm to support both an ageing population and those with disabilities is a key consideration.
		While the ability to provide performance criteria may not be possible, the option to call up Australian standards and other recognised codes should be considered.
		The principles of Universal Design need to be consider not only in the public realm but also in homes and commercial premises.
Car parking and emerging mobility technology	**How can planning policy best respond to the impact of emerging technologies on our city and communities and how can we move to and through them?**	As mentioned above, Smart Cities thinking and technologies are being embraced by both local government and the private sector. The Planning and Design Code needs to be flexible to enable new technologies to be embraced.
	How can the Code best respond to the variance in car parking requirements for different neighbourhoods?	Current planning policy supports infill development within the existing metropolitan Adelaide region. This infill approach may over time result in changes to car ownership and improved public transport as population density increases.
	Will the current approach of minimum car parking rates, with potential for discounted provision, adequately support the desired shift towards more sustainable mobility?	Currently there are many examples of poor design and approaches to infill which impact on the character and liveability of these areas.
		As we slowly transition from car ownership to on-demand car use and improvements to public transport, car parking for both residential and commercial sites will be required.
	Should the Code provide greater opportunity for low or no parking in appropriate circumstances or	Planning policy should be developed to provide for flexibility of use of car parking areas once they are no longer required.

	contemplate maximum parking rates?	The Building Code standards for multi storey car parks or car parking levels within buildings need to be modified to enable these areas to be transitioned into other uses without the need for demolition or major structural works. Within outer metropolitan and regional areas, car parking provision and requirements should be sensitive to the needs of local communities and consider the connectivity and availability of public transport which is either poor or non-existent. Any consideration to reduce car parking requirements should consider the needs and requirements for disabled persons. A reduction in the car parking requirements would not necessarily translate to a reduction in disabled persons' parking spaces. A current issue that the Code could be addressing relates to infill/medium density developments. The minimal front setback and current standards do not appear to adequately address the larger SUV's and utes that are currently popular. This results in inadequate turning areas, garages which are not of sufficient dimensions to cater for the vehicles and generally results in increased on street parking.