

DTI:Planning Review

From: Pen Bennett [REDACTED]
Sent: Friday, 16 December 2022 10:28 PM
To: DTI:Planning Review
Subject: Attention: Expert Panel

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Dear Panel,

I write in a personal capacity although I will draw on personal and professional experiences (I am a civil engineer/transport planner).

Car Parking Policy

Please expand the issue to consider the inter-related issues of car share provision and cycle parking provision, especially for developments within the city and inner suburbs and those located in proximity to activity areas and public transport. This is in line with TOD thinking.

I am concerned that the Code requires levels of car parking that are **unsustainable and entrench car dependence and inequity**.

As a single mother and engineer, I believe in 'walking the talk' (or taking public transport or cycling) and I have chosen to live in locations where my children and I can choose to live without owning a car, within 10km of work, schools, etc. This is not something that everyone can do and **it is imperative that equity, including gender equity, is considered** by the panel. How is the panel considering the diverse needs of the community (e.g. in the calls for two-car parking minimums, is this exacerbating housing affordability, especially for single parents or elderly people/people with disability who cannot drive)? There will always be a vocal group of people asking for more car parking (and 'free' when the chance arises)!

Making it a requirement for two car parks with a three bedroom property comes at a cost:

- It means people who choose to live car-free or with a single car pay for something they do not use.
- Car parking often compromises the house layout and garages and driveways dominate the visual outcome.
- Garaging integrated to individual properties means a multitude of driveways, which can reduce on-street car parking and increase the risk to people walking/cycling along the footpath, especially children.

We cannot continue with the inefficiencies of two car households being the norm/expectation, and that the street directly outside homes is for visitor car parking. EVs are not going to save us with respect to carbon emissions (and definitely not in terms of liveability and healthy streets and communities).

The car parking summary paper suggests that some say that Adelaide's high car commuting habit is a reason for minimum car parking rates, further exacerbated by garages being used for storage. The latter might point to the need for a code with minimum storage requirements? The former is self-defeating and is no way to solve issues of congestion, public health and sustainability. It is similar to 'predict and provide' car transport modelling, which good engineers will admit has not 'busted congestion' and it never will!

As the paper notes, "there is emerging thinking that providing car parking spaces encourages the choice to drive" and inhibits mode shift. Studies indeed suggest that proximity of car parking to one's house influences car

ownership and driving choice (e.g. [Christiansen, Fearnley, Hanssen & Skollerud, 2017](#)). On the other hand, easy to access, secure cycle parking can make it easy for people to choose cycling for feasible trips.

Car share provision has been [shown](#) to reduce car ownership and levels of driving – and increase levels of walking and walking plus public transport use.

As an expert panel, you would no doubt be aware that many places are moving to parking **maximums** as good practice.

Especially within the City of Adelaide and inner suburbs or locations in proximity to public transport and everyday living needs, and especially for multi-dwelling residential/mixed use developments, there should be

- **flexibility for reduced levels of car parking**

- **requirements/contributions for developers to support active and public transport and public realm outcomes. A car parking off-set scheme for sustainable transport initiatives would be welcomed.**

- **increased cycle parking provision**

- **consideration of design requirements for adaptation (e.g. change of use of car parks/garages)**

- **de-coupled car parking (not individual garages attached to dwellings)** especially in larger sites such as Bowden-Brompton. Current car parking streets so people can drive to rear garages in these developments are grim heat islands and seem very space-inefficient. Having visited international developments such as Vauban, *we need to think differently to encourage mode shift and make it convenient and the first choice for people to cycle/walk/take public transport in Adelaide* (not have the car within reach and the default). Design standards would be welcomed, to better raise awareness of the issues of many driveways impacting footpath safety (and on-street car parking availability) and options such as decoupled shared garages/parking areas.

- **Cycle parking**

Provision of adequate, secure and convenient cycle parking is key to higher levels of cycle ownership and use. The current Planning and Design Code sets low levels of cycle parking. It is recommended, as is the case for new developments in the City of Melbourne, that the Code incorporate requirements for one cycle space per bedroom for residential developments.

Cycle parking requirements also need to be more inclusive and consider the needs of people with disability who cycle and women, children and other people who need cycle parking facilities that are easy to use; currently developers can apply the Australian Standard which allows the majority of parking to be provided as vertical parking devices, that require manual lifting. The Code should incorporate requirements for more horizontal parking devices that do not require lifting plus for non-standard cycles (with larger area spaces).

The Code also needs to set out further requirements for personal safety and security of cycle parking, and ease of use; current outcomes (if based only on minimums of the A.S.) result in high levels of cycle theft and poor personal safety, as cycle parking is located often in the depths of basement car parks. Car parks ramps are often steep and the effort of getting into/out of a car park while cycling can be a deterrent. It is recommended that the PDC or design guidance require:

- Some/preferably all cycle parking be located at street level, with good passive surveillance and connected to adjacent cycling routes.
- Cycle parking be provided within car parks have separate cages/secure facilities, with locked doors (not just relying on the car park door as a 'secure' facility).
- Visitor cycle parking at higher levels and again at street level, sited with good passive surveillance and for ease of connection to/from adjacent cycling routes.

For schools, the current requirements for pick-up drop-off on site or within 300m sets up the expectation for driving children to school, rather than good planning that should enable – from the time they commence school as is done in many places internationally -independent, active travel to school. Again, minimum levels of cycle parking (for both primary and high schools but at higher rates for high schools) need to be included, with the expectation that we are planning for healthy, sustainable transport outcomes. Frankly, if we are not planning for children's independent mobility through zoning, siting and safe routes through our planning, we are failing our children (the majority of whom want to walk or cycle but are driven)!

- **Walking and cycling networks**

There does not seem to be a connection between principal/strategic cycle networks (SCN) and principal pedestrian networks (PPN) and land use and its access? It does not seem that PPN and SCN are defined and incorporated, to have weight and be considered in planning decisions in South Australia. In a recent case in Merri-Bek, the presence of defined walking and cycling networks in their Planning Scheme had direct bearing on a decision of refusal at VCAT for a Bunnings. [Blow for Bunnings in bid for new Brunswick store - Brunswick Voice Brunswick Bunnings bootied after residents put up fight \(theage.com.au\)](https://www.theage.com.au/news/merri-bek/blow-for-bunnings-in-bid-for-new-brunswick-store-brunswick-voice-brunswick-bunnings-booted-after-residents-put-up-fight-20170824)

We need to have clarity about PCNs and PPNs (with publicly available maps), that are referenced in the PDC, so developments can be assessed with respect to their integration and benefit/impact on networks through their siting, access and traffic plans. For example, having a PPN on one side of a site would inform/require transparency and for passive surveillance in the development and might require a driveway access to be on another side which is less important as a walking/wheeling route. From a developer perspective, having confirmed PCN and PPN might also show where there will be flows of activity and footfall for successful business and inform how the development interfaces with the streets.

Thank you for the opportunity to provide feedback. I hope that the PDC changes allow for greater flexibility, climate/future use resilience and contribute to mode shift. Personally, I look forward to hopefully being able to buy/rent without paying for multiple car parks that I do not want.

Regards,

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