



3 December 2018

Response to the Integrated Movement Systems Policy Discussion Paper

Australian Institute of Landscape Architects - SA Chapter (AILA SA)

AILA SA thanks the Department of Planning, Transport and Infrastructure (DPTI) for the ongoing opportunity to provide feedback and expertise to inform the Planning Reform in South Australia.

AILA SA is the local chapter representing the Australian Institute of Landscape Architects, the growing national advocacy body representing just under 4,000 active and engaged landscape architects across the country. We are committed to creating a better Australia that acknowledges the benefits that natural systems can provide for our physical and mental health and the role that good design plays in creating vibrant and liveable cities and neighbourhoods.

Landscape architects have the skills and expertise to resolve a diverse range of complex issues with innovative, integrated solutions demonstrated in many award-winning projects across Australia.

We can contribute leadership, creativity and innovation as landscape architects collaborate with many varied disciplines and stakeholders striving to achieve better, healthier environmental, social and economic outcomes for the built environment. Projects include varying scales from citywide strategies to the redesign of local parks. Landscape architects within government and in private practice work alongside other government and allied professionals in building stronger communities through making places and spaces more sustainable, productive and enjoyable for all.

AILA SA has most recently provided feedback on the State Planning Policies and welcomes the ongoing involvement with the Planning Reform consultation process. [Click here](#) to review AILA SA's ongoing advocacy to support the Planning Reform in SA.

We provide the following feedback in relation to the Integrated Movement Systems Policy Discussion Paper.

General Feedback

Purpose - Page 8

AILA SA notes that "The State Planning Commission is mindful of the recent change of Government, and that current strategic directions may evolve as the new Government continues to progress its agenda". We believe that the issues included in this discussion paper are important to all people and to the future of our State, regardless of the political environment and we reiterate our views on the Liveability of Cities below.

More people are choosing to live in cities and built up areas for employment, education and lifestyle opportunities. Increasingly, Landscape Architects are taking leading roles locally and nationally in the planning and redevelopment of urban and regional areas as well as directing major infrastructure projects. The design of our cities, towns and suburbs and their resultant liveability will determine their long term economic success and resilience. Landscape Architects are champions for liveable

cities, in particular through the professional respect of place and increasingly the integration of green infrastructure in advancing climate change adaptation and mitigation.

AILA fundamentally believes that the thoughtful design of both soft and hard infrastructure is critical to the success of planning and reshaping our cities and regional centres to address the challenges of critical social and economic shifts.

Informed development of Australia's infrastructure assets is key to tackling the major issues facing Australia's cities, towns and regions including; climate change, an ageing population, climbing obesity and diabetes rates, reduced fitness particularly in young children, social exclusion and the increasing importance of positive mental health, major transportation challenges, and heat-related deaths.

Why are Integrated Movement Systems Important - Page 9

We support the need for integrated movement systems to help to make places more accessible and productive. It is fundamental to the future development and resilience of all neighbourhoods and communities within the State, and vital for economic growth and competitiveness. We believe all of the issues highlighted in the discussion paper require careful consideration with an holistic approach. All of the issues together contribute to the liveability, vitality and economic resilience of our communities.

- Economic competitiveness
- Liveability, wellbeing and inclusion
- Better balance between access and activity
- Reduced carbon footprint and climate change mitigation
- Smart cities and harnessing of technology

AILA SA strongly supports the improvement of mixed transport choices and reducing the need to increase road capacity.

Partnerships between State and Local government are critical to understand network and movement planning and to maximise opportunities to strengthen our streets and communities. Integrated Movement Systems need to make people the focus.

AILA SA strongly supports striving for ***better balance between access and activity*** along our streets and the value of place in this equation. There is an ongoing tension between State and Local Government and a need to assess how these two issues work within a whole network and system.

The [Streets for People Compendium](#) is an existing strategic document that provides important guidelines in the recognition of the different roles streets can play in the liveability and servicing of cities, towns and neighbourhoods. The introduction of 'Link and Place' assessment has provided a common language that has allowed a range of professions, stakeholders, decision makers and the local community to work together and make more informed assessment on the roles and priorities of streets across Adelaide.

AILA SA suggests the section on ***Liveability, Wellbeing and Inclusion*** has strong connections to the visions of the Draft State Public Health Plan 2019 - 2024 and alignment between Government Agencies can contribute significantly to preventive health measures to support the health and liveability of our neighbourhoods. The value of green infrastructure is critical to the liveability,

wellbeing and inclusion and AILA SA advocates that government policy must quantify and qualify the development of high-quality open space that focuses on the health of our communities.

Opportunities for Green Infrastructure need to be prioritised and integrated within an integrated movement system to support both access, activity and wellbeing. We call for Department of Planning, Transport and Infrastructure in collaboration with the Department for Environment and Water to prepare a Green Infrastructure Strategy. The green infrastructure strategy should set the direction for broader regional landscape management and restoration in SA. [Click Here](#) to read our recent submission on Managing Our Landscapes - Discussion Paper.

Nationally, AILA is calling for the development of a Green Infrastructure Strategy to be led by Infrastructure Australia. The Strategy seeks to advance the significant contribution that ecological and biological systems can contribute to the development of city, regional and rural infrastructure.

AILA SA believes the section on ***Smart Cities and Harnessing of Technologies*** needs to be strengthened. It is critical that Government agencies managing infrastructure are communicating, so opportunities to maximise connectivity, access and activity are prioritised and maximised.

We encourage DPTI to look at [The Future Street Position Statement](#) which outlines a concept that redefines the idea and purpose of the street, by embracing innovative strategies around landscape, infrastructure and technology to make our cities, suburbs and towns more liveable, productive and sustainable. AILA SA advocates that Governments amending policy and regulatory requirements to facilitate the design and management of streets in accordance with the Future Street approach.

Precedents

AILA SA understands the need for efficient transport systems to support the movement of people and goods and services to remain economically viable and to enable access to the variety of services we rely on. However, AILA SA advocates for an approach that reconsiders people and place that elevates the importance of the public realm, particularly streetscapes, regardless of a street or roads function. There are a growing number of global examples that demonstrate the benefits and viability of a more balanced approach to people, place and transport infrastructure. For example, the reprioritisation of pedestrians has been explored in Bogata, Barcelona and Paris. AILA SA is happy to provide more information on these Case Studies if required.

Detailed Feedback in Response to Discussion Paper Questions

Please refer to Attachment A for detailed response to the consultation questions.

We thank you for the opportunity to provide feedback and commend DPTI on this important work. AILA would also be available to meet with your Department to discuss in more detail and look forward to your reply in response to our submission.

Please contact me if you have any questions or contact Sally Bolton – AILA SA State Manager by email - [REDACTED] if you require any additional information.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Willsmore', with a long horizontal flourish extending to the right.

Ben Willsmore
AILA SA State President

Attachment A: Detailed Feedback in Response to Discussion Paper Questions

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?

The Code should respond to needs around public transport nodes with different considerations for different areas such as regional areas, end of lines.

eg Smaller shuttle service to connect local community to a bigger public transport system

Long-term infrastructure and transport planning are critical to drive policy and provide good quality development outcomes. Bipartisan agreements are essential to achieve high level design outcomes.

Consider Park n Ride policy that prioritises Park n Ride facilities in areas where connecting services and opportunities to improve active travel options are limited.

Public transport should generally be promoted as a more desirable mode of transport through improved facilities and amenities at stops/stations, which encourage use. This extends to stops and stations being well connected via accessible and comfortable routes that enable active travel modes.

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

Increasing density is having impact on our streets with increasing numbers of cars. There need to be opportunities for availability of public transport options to encourage alternate transport modes, therefore decreasing the reliance on cars.

There needs to be a balance between oversupply of car parking on site vs on the street. Cars need to go somewhere, however we can't fill neighbourhoods with cars and also achieve high quality streets for people with tree canopy, accessibility etc. Policy provisions need to address a balance and flexibility between onsite parking and street parking in relation to the context of the street and its hierarchy in relation to the broader surrounding street network.

We need an integrated movement system to support the new desired residential densities in key zones to provide options for people in our communities.

Precedent - Seattle's bus renaissance – an efficient bus network was the answer to their transport system. Even with an increased population, the number of commuters driving private vehicles has declined by 10% since 2010. This is largely attributed to higher bus frequency, dedicated transit lanes and streets and quality customer service that includes clean, safe buses.

Our movement systems need to prioritise public transport, pedestrians and cyclists. South Australia needs bold action and decision making that is brave enough to stand up to private vehicle commuters whose voice is disproportionately loud.

More prescriptive controls need to be placed on development to ensure good design outcomes are achieved. A shift in focus to achieving liveability in conjunction with desired minimum densities needs to occur. This includes stronger consideration of opportunities for

green infrastructure in both private and public open space, including streets and a greater focus on infill development that can be served by existing street networks that are appropriate for active travel modes through amenity (quality footpaths, street trees etc) and connectivity to public transport, goods and services.

• 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?

Consistency is required across metro Adelaide region to achieve integration in relation to cumulative impacts of parking and vehicle movement, public realm, and streetscape interface.

There are potential code implications for increased crossovers as density increases – impacts on tree, pedestrian movement, accessibility parking etc and this needs to be addressed to achieve quality outcomes

Policy could look at incentives for basement parking to reduce the impact of cars on the public realm as density increases.

There need to be clearer policy positions to allow the market to adapt and implement change as higher density communities evolve.

Precedent – The City of Adelaide Frome Road Bikeway is a bold move to increase cycling in the city. In cities across the world, cycling continues to grow in popularity, when the investment in quality streetscape and safer infrastructure is made. Leading cities continue to make this investment in the realisation that alternatives must be found to managing transport issues facing cities beyond building more roads.

The existing policies relate only to the private allotment and as such, apart from interface and setbacks, are limited in the positive influence they can have on streetscapes. This has a direct correlation to incentivising active travel. Quality street environments that have appropriate footpath widths, seating, safe crossings and green infrastructure for comfortable microclimates are more likely to encourage walking and cycling.

The opportunity for deep soil zones in front gardens would allow for increased tree planting that could also contribute to streetscapes, contributing to a more appealing environment to encourage active travel and create stronger opportunities for social interaction and sense of place and community.

Policy needs to focus on the needs of pedestrians and cyclists and access to public transport above private vehicle use. This could be done through extension of policy to include outcomes for streets and more prescriptive controls with regard to setbacks, interface and green infrastructure.

There must also be tighter controls to better understand and assess the connectedness of new development, including opportunities to include new strategic links for walking and cycling through existing neighbourhoods.

THEME 2: Capitalising on strategic transport infrastructure

2.1 Strategic Transport Facilities

No Comment

THEME 2: Capitalising on strategic transport infrastructure

2.2 Strategic Transport Facilities

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

The code needs to better integrate provisions for the interface of major transport facilities and adjacent developments including green buffers and other elements of green infrastructure where possible. Good public realm outcomes should still be sought along key transport routes. They should not be mutually exclusive, in fact good public realm outcomes, including green infrastructure, are just as, if not more important to mitigate against the impacts of higher volume transport corridors.

Land use planning needs to adapt and frame these opportunities properly to ensure quality outcomes.

The Planning Code for transport corridors need to consider issues holistically in relation to set backs, lowering road etc.

Developments need performance indicators and elements to ensure adequate design responses in relation to alignments and interfaces if adjacent to a transport corridors.

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

Green Buffers need to accommodate many elements including tall trees and biodiversity. These issues should be embedded in policy to ensure they are prioritised and not value managed out of projects.

The environment for people still needs to be considered on transport corridors. While efficient movement of vehicles may need to be prioritised, it should not be done at the expense of public realm outcomes. Appropriate footpaths, street trees and other planting, shelter, shade, seating and regular crossing locations should all still be included. Particularly as these transport corridors are the likely location for bus stops or light rail stops, so should therefore be safe, pleasant to access and wait at to encourage greater patronage.

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

3.1 Walking, cycling and other non-motorised transport

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

If planning policy is focused on positive streetscapes and interfaces this will encourage walking, cycling and active travel opportunities. There also needs to be a funding mechanism to assist local government with the implementation of streetscape upgrades and their ongoing maintenance.

The big picture strategic focus on road connectivity, walking and cycle lane networks is critical. Connectivity should be enforced and resolved at a master planning level for certain scale development. This could include the requirement for easements dedicated to shared-use path facilities to maintain or improve local connectivity.

As higher density communities evolve there is the danger that streets will have more crossovers for cars therefore reducing amenity, trees, access etc.

We urge Government to recognise the value of Trees as an essential ingredient to the quality of our parks, streets and other public spaces, and for their contribution to the health and well-being of our communities. Trees are better valued for the environmental, cultural and economic benefits they provide to local public spaces, as well as the cumulatively benefits of trees towards more resilient and sustainable neighbourhoods.

An holistic approach is required that examines neighbourhood blocks to assess and determine key routes for walking and cycling and takes an innovative approach to making them more appealing and safe, including dis-incentivising vehicle access, one way streets, shared streets or pedestrian and cycle priority streets (local access only). Destinations should include local centres, access to public transport and schools as a priority.

AILA SA supports the introduction of Design Standards, which will be critical in securing minimum requirements for good public realm outcomes.

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?

Master planning of bigger communities needs policy to enforce pedestrian connectivity. Policy could potentially look at easements for pedestrians allowing flexibility as our neighbourhoods change.

Spatial Planning policy should articulate clearly how certain streets within a neighbourhood are intended to function, for example defining walking and cycling networks that provide access to the local school, park, train station etc. Policy needs to reflect how built form should to respond differently to the strategic roles of a street within a neighbourhood. Links within neighbourhoods need to be clearly articulated within a broader context.

Developments should respond to the hierarchy of the streets, for example local walking and cycling routes with a higher place value should have greater emphasis on interface, passive surveillance and private open space that contributes to the quality and amenity of the street, such as the inclusion of deep soil zones for the inclusion of trees.

This information should be documented city wide and there needs to be LGA direction that establishes the principles and rules - eg if you know you are on a key corridor leading to a school, public space design responses must address key issues.

As detailed in the general feedback upfront, Reference should be made to Streets for

People document at high level within various Government agencies. The State Government also has the Greater Adelaide cycling network plans and each LGA has a walking and cycling plan that should be used in guiding new policy directions.

Policy needs to highlight in designated areas (relative to the overall neighbourhood context) the priority for pedestrian access, cycling and green infrastructure to support the wellbeing and health of communities.

AILA SA notes some councils currently have policies that limit the number of driveways per dwelling to maintain the integrity of pedestrian access and street amenity.

Policy could also set the width of a verge in certain streets to maximise opportunities within a neighbourhood network. (more than minimum). Design Standards proposed are supported as a means to deliver adequate space to support walking and cycling and green infrastructure. Standards may need to vary to accommodate street hierarchies. As above, a designated neighbourhood route to school may have a wider minimum footpath requirement than the standard minimum. This would accommodate families walking to school with prams, children learning to ride, scootering or initiatives such as a 'walking bus'.

Assess opportunities for roads to become one way to prioritise pedestrians, accessibility and connectivity within a neighbourhood and return space for the provision of green infrastructure.

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

Trees and green infrastructure are critical to the development of quality public realm that in turn makes active travel modes more appealing.

Adequate footpath widths to allow for green infrastructure, bins, mobility access, pram and wheelchair, infrastructure and services etc. The development of Design Standards will be critical in achieving this.

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

The code needs to anticipate Ageing in Place for our communities and therefore streets and neighbourhoods need adequate infrastructure to provide universal access. Policy needs to ensure that new developments are embedding this into outcomes. It is critical that Government agencies managing infrastructure are communicating, so opportunities to maximise connectivity, access and activity are prioritised and maximised allowing for flexibility into the future. This also relates to the need for a hierarchy of connected routes providing access to public transport, schools, local centres, goods and services that are designed to principles of universal design and provide appropriate amenity for the elderly such as seating at regular intervals, shade and footpath widths etc.

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

3.2 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 we move to and through them?

Planning policies need to be flexible enough to embrace change and maximise opportunities. Development should be required to consider adaptive and flexible floor plans for any car parking that is integrated into the building eg basement or above ground. In the event of car parking requirements being reduced or not required in future then car parking could be adapted to another use.

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

Current planning codes focus too much on parking. The code needs to make private developments work harder and do more to integrate the car as the public realm is so contested. Design outcomes need to provide flexibility and adaptability.

There should be greater incentives for the inclusion of basement car parking. The development industry needs to embrace this so it becomes a more common solution. This could also encourage the construction industry to develop new skills.

Our streets and neighbourhoods will not function if we push all parked cars into the street. Policy needs to provide flexibility eg adaptive reuse of parking bays so they can be retro fitted into something else in the future.

The code should provide adequate setbacks for parking second cars in driveways allowing setbacks spaces for trees and quality open space contributing to neighbourhood streetscapes. In addition to this, car parking in garages/enclosed car ports should be monitored to ensure that they are being used for car parking, not storage, games rooms or similar.

In relation to the above, adequate storage within dwellings must be provided to mitigate against the use of garages as storage facilities.

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?

Yes, the Code should provide greater flexibility to allow no, or low car parking rates if the circumstances are appropriate. This relates to a maximum rate also. However, if enough carparking is not provided onsite - cars will end up on the streets and the desired outcomes in our neighbourhoods will be compromised. This flexibility needs to be coupled with focussing development and infill in locations that are well connected to public transport and are part of connected communities that prioritise walking and cycling through well designed streets with a hierarchy of routes. Quality and frequency of public transport is also a key consideration. The ability to reduce reliance on private vehicles and subsequently reduce parking requirements will not be possible without viable alternatives.

Policy needs to create development that doesn't put pressure on the streets and should be consistent across Adelaide.

Development on certain streets could attract reductions, minimum requirements if connected to amazing public transport system.