

DATE: 28 February 2020

The Department of Planning, Transport and Infrastructure  
ADELAIDE SA 5000

Attention: DPTI Planning Reform

## RE: DRAFT PLANNING AND DESIGN CODE FOR SOUTH AUSTRALIA

GTA Consultants has reviewed the Draft Planning Code with our comments considering the key areas as listed below:

- Traffic Generating Development Overlay
- Urban Transport Routes Overlay
- Major Urban Transport Routes Overlay
- Transport Access and Parking
- General Comments

A summary of key matters we consider important to be addressed are listed below with further detail provided in the following sections.

- The Code does not define (or could not be found) the definition of urban transport routes and major urban transport routes to understand how they are applied.
- The Code has included many dimensions and distances for access points and their locations, and sight lines – however these are at odds with currently applied standards and guidelines – many of the dimensions and distances cannot be met in an urban environment. It appears the rural code specifications may have been copied across to the urban code? These should also refer to the relevant Austroads Guidelines and Australian Standards to enable appropriate engineering judgements to be made.
- Most of the Deemed-to-Satisfy requirements will see many (if not all) developments referred to DPTI based on minor changes to existing access operation, let alone modifications to an existing access point. This will cause many simple developments to require significant review and negotiation with DPTI.
- Parking rates need to be reviewed and revised to current practice in requirements and definitions – many are outdated with regards to rates. For example:

***Retail fuel outlet*** 6 spaces per service bay, plus 50% of the spaces calculated to be provided for ancillary uses

This is an outdated method for parking calculation as current fuel outlets typically do not have workshops – a rate based on retail floor space is more applicable. The motor repair station rate can be applied separately if required. It is recommended that parking rates be extensively reviewed to meet current parking requirements for various sections of the developments.

- The requirements for Designated Areas do not have references to bus stops or bus route service levels which were previously a key part of designated area application (High frequency bus services) – Table 2 seems to be missing Point A which would have referred to bus stops or services.

Naturally, should you have any questions or require any further information, please do not hesitate to contact me on [REDACTED].

Yours sincerely

**GTA CONSULTANTS**



**Paul Morris**  
**Director**

encl.

GTA Consultants Review and Feedback

## Traffic Generating Development Overlay

There are references to **urban transport routes and major urban transport routes** used in various contexts, however there is no clear definition of what constitutes a major traffic route. Refer to DO1, DO2, DTS/DPF 1.2, 1.3.

These need to be clearly defined and in reference to the road classification system employed by DPTI for arterial and local roads in South Australia. It is noted these are shown in the online mapping portal, but it is not clear how these should be interpreted from the Code itself?

## Major Urban Transport Routes Overlay

What are the requirements for a development to be classified as a Major Urban Transport Routes Overlay? This should be listed in further detail to provide context around why these particular properties have been included.

Access – Safe Entry and Exit (Traffic Flow)

DTS/DPF 1.1

- (a) (i) All developments within this overlay will need to be referred to DPTI if they propose right turn movements into or out of the site access point. Some of the properties included in this overlay are located on typical local roads with low traffic volumes. These properties also require vehicles to enter and exit the site in a forward direction which is not typical for a residential property on a local street.
- (iv) Crossing into the adjacent lane should be permitted, as truck drivers typically wait until both lanes are clear before performing a left turn out. Restricting egress to the left side kerb lane would result in considerably wide driveways which will reduce the amount of footpath available for pedestrians.
- (v) Under the Urban Transport Route Overlay, it specifies all vehicles must enter and exit within the kerbside lane. This is not specified within this particular overlay, which we agree it shouldn't, but it should be consistent for both overlays.
- (b) (i) Reference should be made to AS2890.1:2004 which specifies a minimum crossover width of 3 metres
- (iv) (A) A driveway width of 7-10 metres is considered excessive in this instance. The requirement could be simplified to enable simultaneous movements to occur between the largest design vehicle and a B99 turning simultaneously. There is also no reference as to whether the driveway is one-way or two-way
- (B) A driveway width of 12-16 metres is considered excessive in this instance, especially given the proposed design vehicle is no longer than an MRV. The requirement could be simplified to enable simultaneous movements to occur between the largest design vehicle and a B99 turning simultaneously. There is also no reference as to whether the driveway is one-way or two-way.
- (C) There is nothing specified for vehicles up to a HRV, which conflicts with the Urban Transport Route Overlay.
- (c) An offset of 1.0 metres is typically acceptable, however there are several discrepancies throughout the code with the offset varying between 0.5 metres and 1.0 metres.

Access – On-Site Queuing

DTS/DPF 2.1

- (a) If there are less than 6 dwellings but parking spaces or gates are located within the first 6 metres of the access point does this still satisfy DTA/DPF 2.1 or should these points be separated?
- (c) (i) No parking within 10.5 metre if a driveway is considered over-excessive.
  - (ii) No parking within 14.5 metres of a driveway is considered over-excessive.
  - (iii) A not-Deemed to Satisfy is applied for vehicles larger than a MRV is considered over excessive, given a vast majority of sites would require larger vehicle access for deliveries and refuse collection. It is also noted that roads are currently gazetted for general access vehicles up to a 19m Semi Trailer.
  - (iv) There is nothing specified for vehicles up to a HRV, which conflicts with the Urban Transport Route Overlay.

This section does not specify the actual number of light vehicle queuing capacity. Understood this will be different for different developments but this is not clear.

Access – Existing Access Point

DTS/DPF 3.1

(b) (i) All developments in this overlay will need to be referred to DPTI if the existing access point has an increase of traffic using the point of 10% greater than the existing traffic volumes or 60 vehicles per day (whichever is lesser). Based on this, all vacant properties will have to be referred to DPTI. For clarity this point should also state that it is referring to 10% of the existing daily traffic volumes.

Access – Location

DTS/DPF 4.1

(b) Distance between access points and public or private roads is unrealistic. In an Urban setting, it is rare to have a property frontage wide enough to accommodate these distances. It appears these have been referenced from the rural code and not appropriate for urban situations. Reference to Austroads and Australian Standards should be made for consistency and application of traffic design judgement.

Access – Sight Lines

DTS/DPF 5.1

The proposed sight lines listed does not align against the Access Design Sight Distance specified in AS2890.1:2004 Clause 3.2.4. It also does not align with the Guide to Austroads Design Part 4A, where the sightlines are classified for SISD, MGSD and ASD. It is unclear from the document, how the proposed sight lines were calculated, and as such, would need to undergo further review.

In the past, DPTI have typically requested the sight lines are assessment based on 10 km/h above the posted speed limit. How are they to be assessed in this instance?

## Urban Transport Routes Overlay

What are the requirements for a development to be classified as an Urban Transport Routes Overlay? This should be listed in further detail to provide context around why these particular properties have been included.

Access – Safe Entry and Exit (Traffic Flow)

The Code appears to be specifying too many dimensions to cover various scenarios when actual design should be used to clarify a development proposal – that is using turn path and driveway design

methodologies. The Australian Standard provides design guidance for driveways and this should be referred to in the Planning Code to ensure consistency of design – rather than mandating specific design solutions.

#### DTS/DPF 1.1

- (a) (i) All developments within this overlay will need to be referred to DPTI if they propose right turn movements into or out of the site access point. Some of the properties included in this overlay are located on typical local roads with low traffic volumes. These properties also require vehicles to enter and exit the site in a forward direction which is not typical for a residential property on a local street.
  - (iv) Crossing into the adjacent lane should be permitted, as truck drivers typically wait until both lanes are clear before performing a left turn out. Restricting egress to the left side kerb lane would result in considerably wide driveways which will reduce the amount of footpath available for pedestrians.
- (b) (i) Reference should be made to AS2890.1:2004 which specifies a minimum crossover width of 3 metres
  - (A) A driveway width of 7-10 metres is considered excessive in this instance. The requirement could be simplified to enable simultaneous movements to occur between the largest design vehicle and a B99 turning simultaneously. There is also no reference as to whether the driveway is one-way or two-way
  - (B) A driveway width of 12-16 metres is considered excessive in this instance, especially given the proposed design vehicle is no longer than an MRV. The requirement could be simplified to enable simultaneous movements to occur between the largest design vehicle and a B99 turning simultaneously. There is also no reference as to whether the driveway is one-way or two-way.
  - (C) A driveway width of 16-22 metres is considered extremely excessive in this instance, especially given the proposed design vehicle is no longer than a HRV. The requirement could be simplified to enable simultaneous movements to occur between the largest design vehicle and a B99 turning simultaneously. There is also no reference as to whether the driveway is one-way or two-way.
- (c) An offset of 1.0 metres is typically acceptable, however there are several discrepancies throughout the code with the offset varying between 0.5 metres and 1.0 metres.

#### Access – On-Site Queuing

#### DTS/DPF 2.1

- (c) (i) No parking within 10.5 metre if a driveway is considered excessive and not practical.
- (ii) No parking within 14.5 metres of a driveway is considered excessive and not practical.
- (iii) No parking within 20 metres of a driveway is considered excessive and not practical and may prohibit parking entirely with some sites (i.e. petrol stations, specialty retail shops). This section must be reviewed and reference to the appropriate design guidelines and standards (Austroads and AS) .
- (iv) There are many sites which facilitate vehicles larger than 12.5 metres in length, such as Semi-Trailers for petrol stations and shopping centres. As such, a no Deemed-to-satisfy in this instance is considered excessive.

Access – Existing Access Point

DTS/DPF 3.1

(b) (i) All developments in this overlay will need to be referred to DPTI if the existing access point has an increase of traffic using the point of 10% greater than the existing traffic volumes or 60 vehicles per day (whichever is lesser).

It is unclear if the change in traffic is to be based on daily or peak hourly traffic flows but assuming daily – this should be clarified clearly.

It appears that any small change in traffic volumes will require a referral to DPTI who will have power of direction rather than comments. Hence, all 1 into 2 residential developments will cause a referral to DPTI. 8 trips per day for 1 dwelling to 12-16 trips per day for 2 dwellings – all greater than 10%. There should be some scale for this increase based on the scale of the development.

## Transport Access and Parking

DTS/DPF 3.1

Should refer to Australian Standards for location of access points – the dimension is not clear of how to apply?

DTS/DPF3.6

Restrictive if vehicle can't manoeuvre to exit front ways from the site. Two access points could allow forward entry, forward exit.

## General Comments

- The following land uses do not have a definition provided and should be included within Part 7 of the Planning Code:
  - Ages Person's Accommodation
  - Nursing Home
  - Retirement Village
  - Auction Room / Depot
  - Library
  - Hall / Meeting Hall
  - Hospital
  - Amusement Machine Centre
  - Bowling Club
  - Cinema Complex
  - Concert Hall / Theatre
  - Timber Yard
  - Funeral Parlour
  - Radio or Television Station
  - Call Centre
  - Residential component of a Multi-storey building
- Page 14 – 'A reference in the Planning and Design Code to a specific resource document or standard, means the latest version of the resource document or standard.' Although it is good to state this, when referred to resources it should state the most recent version of the document and then include the version at time of publish.

- A number of sections and references are included throughout the document surrounding the rural code requirements (phase 2). These need to be removed / updated.
- Bushfire overlays references Ministerial Building Standard SA 008, only the first 5 are now on consultation and therefore cannot be reviewed alongside the Planning Code at this Stage.
- Advertising Near Signalised Intersections Overlay - Development should only be referred if the device is located within the Device Restriction Zone as outlined in the DPTI Advertising Signs Assessment Guidelines. This is only a distance of 80m for a 60km/h road. Planning code currently states 100m which does not align with the device restriction envelope distances.
- Non-Stop Corridor Overlay - Some properties located within the vicinity of the North South Motorway have been included within the 'Non-stop Corridors Overlay' even though the property does not connect with the motorway or surface road (e.g. William Street). This results in unnecessary approval levels for these properties in terms of modifications to property access point.  
Non-Stop Corridors Overlay should only apply to properties fronting the corridor or fronting a road which connects to the corridor (within 25 metres).
- Innovation Zone - Innovation Zone not listed as a designated area for residential housing, however it is a designated area for non-residential housing. Of particular interest, Tonsley will comprise multiple uses including residential housing. Given the density of housing, which is proposed, and the proximity to the railway line, should this be included as a designated area. It is noted that the area is also within the Affordable Housing Overlay, where lower rates apply for affordable housing. However, should designated rates also apply for other types of housing stock?
- Car parking rates listed throughout the individual zones and policies in the document do not all align with what is provided within the parking rates table. This needs to be updated to provide consistency throughout the document.
- The requirement of On-street parking requirements should not be specified within the document as this is out of the control of the developer.