



THE BICYCLE INSTITUTE OF SOUTH AUSTRALIA
111 Franklin Street, Adelaide 5000
chair@bisa.asn.au
Cycling for the Environment, for Health, for Pleasure

21 September 2018

Sarah Elding, Project Lead State Planning Policies
Department of Planning, Transport and Infrastructure
Level 5, 50 Flinders Street, Adelaide 5000/
GPO Box 1815, Adelaide SA 5001
DPTI.PlanningEngagement@sa.gov.au

Dear Sarah

State Planning Policies

Thank you for the opportunity to comment on the draft State Planning Policies. The policies that are the subject of the current consultation are broad and quite conceptual. We understand that we will be given more opportunity to comment when the draft Planning and Design Codes (including the Code "Integrated movement" and "People and neighbourhoods") are released before the end of 2018.

Nevertheless, we would like to urge at this stage that the Codes reverse the historical encouragement of car traffic via parking provisions. The planning system currently enforces considerable subsidies for motor vehicle use through supply-oriented car parking requirements. As the *Integrated Movement Systems Policy Discussion Paper* points out, parking provisions add to the cost of residential and office construction, as well as bulk. In doing so, they create direct costs in addition to the indirect costs of additional traffic and less walkable neighbourhoods.

BISA supports the notion of "unbundling" car parking from the planning system and returning parking to a market mechanism delivered by the private sector, as suggested at the Parking Summit that was held as part of the planning process.

Without this unbundling, the planning system will never deliver on high level policies such as "promoting use of alternative transport modes including walking, cycling and public transport". Such high-level policy statements are pointless while Councils continue to enforce minimum motor vehicle parking requirements. The only suitable high-level policy related to transport that could be delivered by this approach is "encourage motor vehicle use for all trips".

Although we are yet to see the draft Codes, our concern has been piqued by elements of the *Integrated Movement Systems Policy Discussion Paper*. Discussing parking rates, the paper indicates that "Transition the existing SAPPL policy on the design of car parking structures so they are adaptable for new uses in the future" is "Transition ready".

To say that they are "transition ready" suggests that the status quo will be maintained. Does this mean that existing parking rates, which are all based on parking minimums, are what we are to expect in the future? If so, this is simply business as usual.

Turning to the policies, our general support is couched within a concern expressed above — that high-sounding phrases may be useless if they are not followed up in the Codes.

The policies themselves are clearly written and indicate broad directions to guide the Codes. In particular, we would like to express our support for the car parking feature of Policy 7 under Integrated Planning:

“Support housing choice and mixed-use development around activity centres, public transport nodes and strategic transport corridors with *reduced carparking to encourage greater use of active transport options such as public transport, walking and cycling.*” (emphasis added)

We also particularly support Policy 6 under Design Quality:

“Provide high quality, functional and accessible public green spaces and streetscapes, particularly in areas with increasing infill development, housing diversity, population growth, medium to high residential densities and urban renewal.”

We suggest that this could be strengthened to call for green spaces to be linked to each other and to activity nodes where possible.

While we understand the need for freight routes, we are unenthusiastic about Policy 8 under Strategic Transport Infrastructure:

“Identify and protect the operations of key transport infrastructure, corridors and nodes (passenger and freight).”

What this means is apparent in the *Integrated Movement Systems Policy Discussion Paper*, under Strategic Transport Corridors 2E:

“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.”

We know what road widening means to DPTI. This image is the proud masthead for its Darlington Upgrade Project web page:



Is this what we want for Adelaide? How can it be reconciled with the desire for accessible, walkable communities that feature so strongly in the discussion paper? The barrier posed by such infrastructure is obvious. Also, as is pointed out in the *Discussion Paper*, there is a clear inverse correlation between the proportion of travel undertaken by car and the liveability of a community. Widening roads reduces the liveability of communities.

Unlike South Australia’s transport planning, the *Discussion Paper* also considers the impacts of new technologies on transport — technologies that may well make private car ownership a relic of the twentieth century. We would add that they would necessitate new forms of revenue-raising to replace the traditional reliance on petrol franchise fees and excise. Pricing for road use and particularly congestion is the obvious alternative — an alternative that may render road widening anachronistic.

Any protection of key transport corridors should not be confined to “passenger and freight” corridors. There are many creek and river corridors that cannot be used as active transport routes because the land along them has been sold into private hands. SA Water’s proposal to locate new infrastructure centrally within the Brownhill and Keswick Creek corridors would render these

corridors useless for a new bicycle greenway. The development of a network of quiet on-street routes is frequently frustrated by a street network that forces detours that discourage cycling.

We urge the identification and protection of active transport routes and corridors as well as passenger and freight corridors.

We look forward to the release of the draft Planning and Design Codes.

Yours Sincerely

Dr. Ian Radbone
Committee member