

The Secretary
State Commission Assessment Panel
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Re: Development application for 76 Magill Rd Norwood
Development Number: 155/M009/18

The Bicycle Institute of South Australia has been advocating for utility cycling since 1974. We represent the interests of people who cycle to work, school, shops and for other daily activities rather than for recreation or sport. Further, our aim is to not only represent existing cyclists but to assist all levels of government in their aims of converting “proto-cyclists” – the significant proportion of the population who say that they would cycle if conditions were safe enough – into active cyclists, and protecting the safety of the cyclists who do use our roads.

We have four submissions to make in regard to cycling matters.

- 1) We are very concerned with the proposal to remove peak hour bicycle lanes from Magill Road along the length of the site frontage. Please consider the following submission that objects against the proposed removal of these peak hour bicycle lanes. The grounds that we submit should be considered, and require a change, are as follows.

The *Norwood Green Planning Statement* submitted by the proponent states regarding this proposal that:

“The actual impact on cycling will be minor with discontinuous bicycle lanes to the west on Magill Road. Alternative bicycle routes are also available (via Beulah Road to the south) for safer travel by cyclists not confident enough to contend with sharing the kerbside lane with traffic. The lack of bicycle lane will not deter the more experienced commuter cyclists using Magill Road.”

This statement shows a complete lack of understanding of the role of the peak hour bicycle lanes.

Firstly, the proponent’s Planning Statement fails to acknowledge that Sydenham Road has been designated by the state government as a BikeDirect route providing regional connection from Rose Park (Grant Avenue) through College Park/Stepney/St Peters and beyond (via George Street/Harrow Road). Hence although the bike lanes are discontinuous to the west of Sydenham Road, to the east of Sydenham Road (i.e. the area in question) these lanes provide commuters with valuable connectivity.

More than this, though, the bike lanes provide safety to cyclists when it is most needed.

The proponent admits that commuter cyclist will continue to use Magill Road even if bike lanes are not provided. The proponent therefore assumes a reduction in cyclist safety produced by the removal of bike lanes is acceptable.

DPTI's A Functional Hierarchy for South Australia's Land Transport Network identifies Magill Road as a "Major Cycling Route (metro)". Such routes should:

- Optimise cycling travel times;
- Provide space specifically for cyclists, including continuous designated and dedicated road space or paths (i.e. no squeeze points);
- Provide separation between cyclists and moving traffic;
- Provide priority for cyclists.

Removal of existing facilities is not compatible with any of these goals. Instead, given the development proposal having adequate off-street parking, we would request that on-street car parking be banned on the Magill Road frontage to the site as part of the development to enable at least this section of the westbound bicycle lane to function as a full-time facility. Somewhat ironically, the role of a "Major Cycling Route (metro)" is to provide:

"Direct, continuous links to the Adelaide CBD, regional centres, district centres and major employment areas, as well as access to key cycle trip generators (e.g. strip and local shopping, educational institutions and places of cultural and social activity.)"

The proposed ALDI development will make the site a key cycle trip generator and increase, rather than reduce, the priority of bike lanes in Magill Road.

The proponent casually states that alternative bicycle routes are available. Alternative car routes to Magill Road are also available, would the proponent propose that Magill Road be closed to through traffic to provide a safe and convenient entry to the site's customers?

We further note that the Austroads 2017 guidelines used to justify the right hand turn treatments with median protection are relevant to intersections, not driveways and other access points. There are many other right hand turns on Magill Road that do not have median treatment. If the right hand turn is considered so unsafe that it can only be facilitated by providing a median treatment, the obvious answer is to limit access/egress to left in/left out only, which would provide much greater safety than a median treatment can guarantee. Providing the right turn into the site from Magill Road is a choice and the proposed sacrifice of the peak hour bicycle lanes an expediency for the developer, not a necessity for traffic function or road safety.

- 2) In terms of the proposed bicycle parking, we note that the Planning Statement proposes "a rail" be provided for ALDI customers and staff. This must be a long rail to provide the 20 employee and 10 customer spaces the Planning Statement says are required for retail development!

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Applicable guidance (Australian Standard AS 2890.3-2015, *Parking facilities: bicycle parking facilities*, Austroads *Cycling Aspects of Austroads Guides*, 3rd edition, 2017) make clear that customer and employee parking needs are very different. It is not clear from the description of bicycle parking proposed that these different requirements are adequately addressed. The provision of a 'bicycle rack' apparently within each apartment is even more vague as to what is intended.

The Bicycle Institute therefore submits that the Planning Statement does not demonstrate compliance with minimum parking requirements.

- 3) The proponent notes that the 62 car parking spaces provided for the townhouses exceeds the minimum of 44 required. Evidence demonstrates that the amount of car use is strongly related to availability of cars and ease of parking. Over-provision of car parking giving rise to additional traffic is not desirable in an inner-City location serviced by a GoZone on its doorstep. The provision is even more generous given the Development Plan rate quoted does not consider added efficiencies gained from parking provided for different land uses on this mixed use site.

The South Australian Planning Library's *Vehicle and Bicycle Parking Rates* was prepared to "achieve the objectives of the South Australian Planning Strategy and South Australia's Strategic Plan (SASP) to reduce private vehicle use and increase the usage of more sustainable transport modes". This suggests that off street vehicle parking requirements for mixed use and corridor zones should be generally lower than the standards usually applied in local Development Plans as they will be applied to locations where vehicle parking demand is expected to reduce over time – including areas that are well served by public transport and other sustainable transport modes, such as the subject site.

While no maximum parking rate is indicated, it is difficult to see why excessive car parking should be supported, given that the traffic movements that result from this will increase the exposure risk to pedestrians and cyclists using Sydenham Road and Osmond Terrace, and potentially crossing Stephen Street; and when the statutory requirement for public open space is not met (with 9.3% being provided instead of 12.5%).

We would instead submit that the proponent be required to provide the statutory requirement for public open space and consider negotiating with Council to provide adequate public car share spaces in Stephen Street to cater for possible resident demand for access to a second car.

- 4) Noting that Sydenham Road is a designated BikeDirect route, and that Osmond Terrace has formal bicycle lanes, the treatment of Stephen Street where it intersects each of these roads is not of a form that would best ensure the safety of either cyclists or pedestrians in either Osmond Terrace or Sydenham Road.

Research has demonstrated that continuous footpath treatments significantly reduce crashes with pedestrians and cyclists from vehicles entering/ exiting side streets to/from more major roads – the situation that will occur with Stephen Street. We therefore submit that continuous footpath treatments should be provided at these junctions. It also appears that the driveway into Aldi is designed as a roadway, cutting the footpath. This should be designed as the driveway it is.



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Development of the former Caroma site is a once-in-a-generation opportunity to create a community asset for Norwood. Any approved development should be in keeping with adopted government intentions regarding cycling, walking and public open space. The current proposal falls short in this respect and we respectfully submit the plans should be improved before Development Approval is granted, for the sake of our future communities.

Yours sincerely,

A handwritten signature in black ink that reads "F. Patterson".

Fay Patterson
BE, MAITPM
Immediate Past Chair
The Bicycle Institute of South Australia.