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Bicycles are future mobility

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Thank you for the opportunity to provide feedback on the Integrated Movement Systems Policy Discussion Paper.

As urban populations increase individual, community, environmental and economic health all rely on a transition away from private car use. Cities that thrive prioritise walking, cycling and public transport and those that remain car oriented are making a transport revolution.

However, South Australia to date has attempted a transition to higher urban densities without suitable action to curb individual car use. The Bicycle Institute of SA (BISA) was therefore pleased to read the background paper that suggested these tensions would be resolved. However, it was with concern we went on to read the policy directions set out in the Policy Discussion Paper; policy directions that continue to inhibit growth in walking, cycling and public transport, and will ultimately undermine the overarching intentions of the planning policy reform being to “support and enhance the state’s liveability and prosperity in ways that are ecologically sustainable and meet the needs and expectations, and reflect the diversity, of its communities” (Policy Discussion Paper, p. 5).

The narrative set out in the Policy Discussion Paper is as follows:

1. Message one: The existing transport corridors are efficient and they need to remain so (extrapolated to mean a route for cars and freight) from theme 2 – capitalising on strategic transport infrastructure
2. Message two: There is a need to promote walking and cycling but still prioritise the movement of vehicles (link and place) from theme 3 – sustainable mobility, car parking and the impact of technology
3. Message three: There is an imperative to align growth with transport infrastructure. The existing State transport plans will support this integration.

BISA challenges this narrative in the following ways:

1. The existing transport corridors are not efficient on any measure including economic, health, environmental and social. They will become more inefficient as densities increase. However, our arterial roads could operate effectively if high speed bus lanes, separated bikeways and a pedestrian friendly environment was introduced. Freight movement can remain efficient with a shift from a high reliance on the private motor vehicle. The two are not interdependent.
2. You cannot promote walking, cycling and public transport without prioritising it above motor vehicles and challenging the premise that motor vehicles are needed to LINK. There is no conflict

between LINK and PLACE when walking, cycling and public transport are prioritised. They are compatible. The narrative ignores the fact that motor vehicle dominance in SA is supply led rather than a measure of demand, and that this supply has actively inhibited use of alternative transport modes. A quote about streets from your Policy Discussion Paper (p. 11) demonstrates the problem “while they are important public places, they also need to be accessible, fast, efficient and minimise travel time”. A sentence straight from a 1970’s transport plan promoting the car as the answer to our transport issues.

3. You will not gain the densities you require irrespective of your zoning while you have a car-oriented city. A car-oriented city goes against all the principles of higher density living. Density alone does not decrease traffic congestion. Density with appropriate transport policy reduces traffic congestion. Density itself increases traffic congestion in car dominated cities. Our existing transport plans do not adequately support policy to increase urban densities. **You cannot wait for density to make the transport revolution.**

Despite our concerns with the unresolved tensions in the narrative of the policy directions, please find below a detailed response and recommendations. Our response focuses on the policy directions and what policy within the Planning and Design Code can support a shift to healthy and happy higher density living as well as the necessary levers outside of the development assessment process that are required to support a shift away from a reliance on the motor vehicle. Furthermore, we question the ongoing review process that will support the new Code.

THEME 1: Aligning South Australia’s growth and transport infrastructure

Response to 1A

BISA does not believe these codes are transition ready.

Recommendation:

Any zones which encourage higher density living with the aim of incorporating integrated movement principles should:

1. Explicitly state a hierarchy of transport priorities being walking, cycling, public transport and then car use.
2. Objectives, Desired Character statements, Principles, bicycle parking and car parking provisions within these zones should then reflect this hierarchy.
3. Zone policy should explicitly aim to create pedestrian only streets in centre areas.
4. Car parking provisions should be unbundled and managed under a market mechanism and removed from individual developments, both business and residential. Planning and Design code in the Zone should allow for private sector car parking (business land use) on the outer edges only of the zone to limit the movement of vehicles in the zone.
5. Policy should ensure developments contribute to the public space of the street and encourage people to participate in the street such as: preventing front fencing, ensure a set back with small useable front area to gather, deliver continuous footpaths across the front of the property, provide some greening to the street.

Response to 1B

Are minimum thresholds for population density effective or do you need to first provide the environment to support this growth? Global evidence shows people who walk and ride have a higher retail spend. In London it is now recognised for High Streets to thrive they must encourage people to walk and ride. **A focus on creating thriving people-oriented zones will ensure the viability of public transport, shops and services.** Invest in the walking and cycling network of areas zoned higher density living simultaneously with rezoning. You cannot wait for density to make the transport revolution. Make the transport revolution and density will follow.

Planning code could enforce financial contributions from developers to support the implementation of better walking and cycling networks. These funds could add to Government of SA funding available to build more people-oriented spaces.

Recommendation:

1. Create an “Active Transport Density Fund” and require a contribution from developers to the fund for them to gain planning consent. Establish a framework to distribute funds to Local Councils to assist them to build a friendly walking and cycling environment (particularly where the State Government is requiring them to increase densities). These networks will assist with the viability of public transport and local shops and services.

Response to 1C

If locating high density zones along road corridors these corridors would require the following to ensure residents had an acceptable quality of life and density policy gained public acceptance:

- Convert one lane to a bus only lane or other mass transit (Tram)
- Have a separated bikeway
- Ensure the road is pedestrian friendly with wide footpaths and greening.

Global evidence demonstrates such a conversion would increase the efficiency of our arterial roads to move both people and freight. **Our roads ability to function as both link and place is only impeded by the prioritisation of motor vehicles. In fact, the use of such terms, is only required because motor cars are prioritised; there is no conflict between the two when you prioritise walking, cycling and public transport.**

SA arterial road corridors in their current form are highly inefficient and not acceptable for zoning to increase residential densities because of the risk they present to human health and wellbeing. The existing zoning of these roads as suitable for higher density mixed use living goes against all principles of density.

Recommendations:

- Reimagine how people can most efficiently travel on existing road corridors (as above)
- Consider cycling catchment areas – to both public transport and centres when making use of zoning and density to support integration (as discussed for walking on page 28 of the background paper)

- Define Separated Bikeways and Greenways as “Transport Corridors” suitable for spatially locating higher density zones and centres. Create a State Bike Plan that maps out these corridors.

Discussion questions:

How can the Code better respond to the differences in public transport availability in urban and regional communities?

Limit development where public transport is poor. Develop cycling networks to safely assist people to access public transport. Invest in the public transport network to improve services.

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

- Remove minimum car parking requirements. They significantly limit the types of developments allowed on a site. Change these to maximums or unbundle.
- Limit development sizes. Currently very large housing is allowed on very small blocks, leaving no vacant land. People do not like this. Instead put a cap on the building envelope based on site size.
- Ensure development contributes to the street with a front set back and greening as well as some space to engage such as a veranda or pergola. Prioritise this over small private rear spaces.
- Consider how policy could create more pedestrian only spaces
- Limit knock down one to build two developments and instead try to focus on sites where you can add more residential flat buildings and small multi-storey developments (up to 3 floors). For example write policy that would allow a two-storey building with 4 quality apartments and surrounding greening in preference to two very large semi-detached dwellings.
- Allow more creative development. For example, infill without having to demolish existing homes. Planning policy in the Code could allow two units in the rear yard if minimum car parking and driveway access requirements do not apply. Planning policy in the Code could ensure the quality of these developments by restricting internal fencing, instead encouraging engagement. Alternatively, the Code could allow a small 2 storey development with 2 apartments in a rear yard. There are many options.
- Include policy in the Code that supports Co-Housing initiatives – small individual units with shared spaces
- Include policy in the Code that supports Tiny Houses

Does existing policy within the SAPPL adequately address issues relating to the perceived quality and impacts of higher density development? E.g. impacts of parking and vehicle movement. How might targeted policy reform promote or incentives better outcomes?

No. Policy favours developer return over community outcomes. Policy has also worked to increase density without altering transport behaviour, instead catering to “perceived” demand for motor vehicles. Suburbs with infill have more houses, more vehicles, less open space, fewer trees, inadequate footpaths (a metre

wide leaves no space for a family to walk) with more driveway crossings and few safe cycleways. The benefits of density haven't eventuated. There aren't more people on the streets. Kids aren't out walking and riding. There are no more local shops or services. Public transport services have not increased. Our roads are completely car oriented. Why would people want this?

What review process has taken place to understand which policy from SAPPL enforced through Local Development Plans is enforced? It appears that the general policy to try to deliver quality is ignored, whilst the quantifiable policy is enforced.

Targeted policy reform must focus on delivering a quality urban environment for people as a priority. Give back to those communities whose lives are being altered by urban infill. Develop policy that puts individual, community and environmental health first. Density and developer return will follow. People want attractive, green and pleasant neighbourhoods. Invest in their communities by creating great streets and public places. See above for specific policies.

Theme 2: Capitalising on strategic transport infrastructure

Response to 2F

Global evidence, as presented in your own background paper, would highly dispute the premise that our transport corridors are efficient. It is exactly this premise that is the downfall of all this talk and will be the downfall of your policy when implemented.

Discussion questions:

How should planning policy balance the need for airports in strategic locations against the impact of these facilities on adjacent owners?

Require triple glazing for all new developments and renovations requiring planning approval

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

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

Planning policy can only restrict development on transport corridors with high vehicle use. These corridors are very unhealthy for human habitation. Transport policy, however, should radically alter the make-up of these transport corridors and density could follow. Each should include:

- a separated bikeway
- a separated busway (peak hour)
- a wide footpath and pleasant pedestrian environment
- space for freight rather than individual car use

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

3.1 Walking, cycling and other non-motorised transport

Response to 3A

BISA does not believe the current SAPPL policy is well placed to transition to the new Code. If the planning Code is aiming to encourage bicycle use and discourage car use the rates should reflect this, however the bicycle parking rates set out are highly inadequate. A case study is provided below to demonstrate.

Case study: comparing the required bicycle and vehicle parking rates for the Mixed Use and Corridor Zones (as provided as an example in the Background Paper (pp. 55-59))

Row, semi-detached and detached dwellings

Bicycle parking – no parking requirements or guidelines set to ensure access for bicycles to properties.

Car parking – minimum requirements 1 park for 1-2 bedrooms and 2 for 3 +bedrooms.

Bicycle parking rates are only set for residential development in residential flat building and multi-storey dwellings. There are no requirements for residential flat buildings, row, semi-detached and detached dwellings. While these dwelling types historically may have had room for bicycles, they now frequently have little room to securely store a bicycle, or number of bicycles (a semi-detached dwelling may contain a family of 5). Comparatively in the zone residential flat buildings, residential development in multi-storey buildings, row, semi-detached and detached dwellings all have off-street vehicle parking requirements and would therefore have to show plans on where these parks are located and how they will access the street.

Multi-storey buildings

Bicycle parking: 1 bicycle park for every 4 dwellings. Visitor 1 for 10 dwellings.

Car parking – various minimum only rates from 0.25 to 2 car parks for dwelling depending on the number of bedrooms. No maximum rates set. Visitor 1 for 4 dwellings.

Office

Bicycle parking – 1 for every 200 square metres of gross leasable floor area (employee) and 2 plus 1 per 1000 square metres of gross leasable floor area (visitor).

Vehicle parking – minimum and maximum rates deliver between 3 and 6 spaces per 100 square metres.

Shop

Bicycle parking – 1 for every 300 square metres gross leasable floor area (employee) and 1 for every 600 square metres of gross leasable floor area.

Vehicle parking – minimum and maximum rates deliver between 3 and 6 spaces per 100 square metres.

Tourist accommodation

Bicycle parking – 1 for every 20 employees 2 for the first 40 rooms plus 1 for every additional 40 rooms

Car parking – minimum and maximum rates set delivering between 1 and 2 car parks for every 4 to 5 bedrooms.

All other non-residential development (excluding tourist accommodation)

Bicycle parking – no rates set

Vehicle parking – minimum and maximum rates deliver between 3 and 6 car parks for 100 square metres

Flexibility

The same flexibility is afforded to concessions on bicycle parking as for vehicle parking. Supporting investigations could argue for a lower rate. Why would you allow concessions on bicycle parking when it is a mode of transport you are trying to encourage?

All other zones

Are there set bicycle parking rates for other zones?

Showers and lockers

No clear provisions for end of trip facilities for employees including showers and lockers.

Summary:

If the policy directions are followed the Code will require considerably more car parking than bicycle parking, directly contradicting the intention to shift to more sustainable transport options.

Recommendations:

- review all parking and access requirements for bicycles and vehicles and ensure the planning code delivers MORE bicycle requirements than vehicles for each development type in each zone, for residents, visitors and employees. Include a table of required parking rates for each zone type in the Code.
- require plans for all residential housing types to show where bicycles will be securely stored and how they will access the street. Set required bicycle parking rate for each dwelling based on the possible number of occupants – a place for a bike for each occupant.
- set maximum car parking rates or unbundle car parking.
- review the implementation of the policy once developments are finalised – was bicycle parking delivered and at what rates? Was car parking delivered and at what rates?
- do not allow flexibility to reduce bicycle parking requirements.
- include a table with required numbers of showers and lockers for employee use in commercial developments.

Other policy in transportation and access:

Our expectation that the general priorities set out in the Transportation and access section will radically alter to truly demonstrate a commitment to integrated movement systems. Some examples: PDC 8 states: Development should provide safe and convenient access for all anticipated transport modes. If serious about transitioning to sustainable transport modes this should state: PDC 8: Development should give

priority to walking, cycling and public transport access. Objectives should also state a hierarchy: Development should prioritise and encourage access for people walking, cycling and using public transport rather than 2 (a) development that provides safe and efficient movement for all transport modes.

Response to 3B

BISA supports this proposal however does not believe this needs to wait until Reform (Gen 1).

Recommendation:

- Transition bike routes set out in the LGA cycling strategy during the first transition stage and look to zone areas along these routes as appropriate for higher density development.
- Check Local Council Bicycle Plans for cycle routes and include these in the initial transition.
- Develop a State Bicycle Plan that maps out a comprehensive metropolitan cycling network (and rural networks) and add these routes in Reform (Gen 1).

Cycle routes in development plans are also ignored during the development assessment process as vehicle access is the primary concern.

Discussion questions:

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

- Implement set requirements for bicycle parking for all residential and business land uses. This would require developers to show every single time where they are providing secure bicycle parking before they receive planning approval. Implement a review process to check that all new development is having these codes enforced (see above for more detail).
- Increase the number of bicycle parks required for each land use.
- More specifically state through policy what is required for showering and locker room services (end of trip facilities) in new developments including the number, size, accessibility etc.
- Create zones for centre and higher density living based on access to safe cycle routes and along planned bikeways and deliver this infrastructure simultaneously with development.
- Consider how electric bikes will impact future demand for cycling infrastructure and bicycle parking.
- Create a State Bicycle Plan with a network Map and include this in each Development Plan.
- Reduce the number of car parks required for each land use.
- Unbundle car parking from the planning process and return it to a market mechanism where car drivers pay the true cost of the land required to park their vehicle.
- Consider funding - Create an "Active Transport Density Fund" and require developers to donate to this instead of providing on-site car parking. The Government of SA and Local Councils could then access the fund to develop their walking and cycling networks in areas where density is increasing.
- Include planning policy for large scale housing developments (i.e. Lightsview) that delivers car free zones in centre shopping streets or pedestrian-only streets such as Rundle Mall.
- In new large-scale housing developments create a permeable network for walking and cycling, but restrict vehicle through access (e.g. no through roads for cars).

- Footpaths:
 - In new large-scale housing developments:
 - require wide footpaths that can accommodate a family walking along together (including pram and dog and kids on scooters). For example, 2m wide footpaths.
 - Use policy or design guidelines to redefine what a street is. Throw away the template of 2-way traffic and parking on both sides and create streets with greening, wide footpaths, and safe places to walk and ride. Streets that say people first.
 - Include policy that requires developers to create streets with continuous footpaths (rather than the footpath giving way to cars at every intersection).
 - Include policy that requires a developer to ensure the footpath surface or footpath camber is not impacted by a driveway crossing including requiring them to ensure the footpath is continuous across the driveway in a consistent material (i.e. the same paving as the footpath).
- Bikeways:
 - In new large scale development sites require the delivery of a network of separated bikeways connecting homes, schools and shops with priority at intersections.
- Require large scale new development (residential and commercial) to provide pleasant public through access for pedestrians. This will slowly deliver a fine-grained walking network for people in their local areas.
- Clearly state a hierarchy – walking, cycling, public transport and then vehicles.
- Add active transport as an appropriate use for funds from the Basic and General Infrastructure Scheme
- Access - require all developments to have attractive, separated access for pedestrians and cyclists. From feedback neither of these things are considered a priority in many development application decisions.

How can planning policy assist in balancing the tensions between prioritising the movement of vehicles (Link) and quality of the space for pedestrians (Place along our streets)?

There is a fundamental problem with the question. Why are vehicles prioritised as the mode required to provide link? If the movement of vehicles is prioritised it is contrary to **all** density policy. Without resolving this tension you can not integrate growth with transport networks as your transport networks will **ACTIVELY INHIBIT DENSITY**. There is no conflict between LINK and PLACE when walking, cycling and public transport are prioritised. Effective LINK would include roads with a high-speed bus lane (cars excluded), separated bikeway and widened footpaths and greening.

It is not necessary to wait for density to make these changes. Your background paper states 75% of daily trips are between 3 to 6 kilometers; an easy distance to cycle. We also know many people commute to work despite there being a viable public transport alternative (primarily because they have access to free car parking, much of it delivered by planning policy). There is existing demand for improved public transport and cycle networks.

Freight movement in Adelaide will have to modernise to suit a higher density environment, as it does in other cities. Smaller vehicles, cargo bikes, and effective distribution practices. If you design a transport system to suit B-double trucks you will never have a lively and healthy city.

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

Streets make up 80% of the public space in Adelaide. Yet, most are unused by people, except for those in cars. Throw away the template that allows 2-way traffic flow and parking on both sides and re-imagine what a street can be. Make every development consider the street as a community space. If the street is a community space how can development support it?

- Encourage people on the street by requiring a usable front yard or balcony area.
- Prevent front fencing (and to the side at the front) that cuts neighbours off from talking with one another.
- Include policy that orientates living to the street rather than private back spaces.
- Limit the size of new development in relation to the site. Currently planning policy allows very large new semi-detached dwellings on very small sites. Planning policy should instead only allow small to medium semi-detached dwellings on small sites. It is the lack of unbuilt area that the community is concerned about. Planning policy CAN fix this. The same is true for residential flat buildings and multi-storey – ensure each has some unbuilt land area and that this contributes to the neighbourhood in some way.

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

Yes, all new footpaths should be at least 2m wide to accommodate such future uses and streets designed for people rather than cars where mobility scooters etc can then safely travel.

3.2 Car parking and emerging mobility technology

Discussion questions:

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?

It isn't just emerging technologies that require consideration but emerging systems. For example, sharing economies. The policy directions do not address the need for developments to provide car sharing opportunities. Privately car sharing schemes are in places as well as services such as go-get.

Consider small electric vehicles and their impact including electric bicycles. How will developments provide secure parking and recharging opportunities for these vehicles?

Consider bicycle sharing schemes and the policy implications for planning.

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

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?

No, minimum car parking rates will not support a shift toward sustainable mobility. BISA supports unbundling car parking from development in the planning code, as discussed at the Car Parking Summit. Without unbundling car parking, the Code will continue to lead supply orientated motor vehicle dominance at the expense of all other transport modes. Minimum car parking rates subsidise the true cost of using a car and will fundamentally undermine a shift towards a more sustainable future in South Australia.

Providing car parking is a great cost to developers. If car parking was unbundled developers could instead contribute to an “Active Transport Density Fund” or “Public Transport Fund”. If a car park cost is approximately \$30,000, these contributions could radically alter the funds available to build sustainable transport networks. People could still own and access vehicles, but not at the property. Parked with privately owned vehicles could be an array of shared vehicles available to hire for those who do not want to buy a private car park.

If unbundling does not occur, low maximum rates should replace high minimum rates.

It isn't just a transition to sustainable transport that is impacted by minimum rates. These rates also significantly hinder the type and density of development that can occur on a site and restricts many creative solutions.

The policy directions set out in the Policy Discussion Paper will deliver business as usual – very high rates of motor vehicle dominance at the expense of all other transport modes and at the expense of our individual, community and environmental health. Be brave!

Supporting levers and processes

A Bicycle Plan

South Australia has been without a bicycle plan since 2010. **A plan is urgently required. An effective plan would map** out a comprehensive, functional, safe and connected cycle network; a network for anyone (8–80 years) and any trip. This plan could then provide a detailed overlay for Local Development Plans and highlight spatial locations and transport corridors with quality cycling infrastructure appropriate for higher density living.

Funding

Allocation of funds through the budget process clearly demonstrates how a Government prioritises different transport modes. Cycling receives less than 1% of the transport budget. At the same time billions are being invested into bigger and “better” roads. If the Government is serious about Land Use and Transport Planning integration and a shift towards walking, cycling and public transport the State Budget must reflect this. The UN recommends Governments’ allocate 20% of their transport budgets to active transport. The Government should immediately increase the percentage of the state transport budget allocated to cycling infrastructure to 5%. Is this a good investment? Recent research shows for every \$1 spent on bicycle infrastructure there is an \$11 return in health and environmental benefits (without considering congestion costs) leading the researchers to conclude “when a concerted investment is made in active travel in a city, there is likely to be a measurable, positive return on investment” (1). The Government of SA should also allocate 5% of its transport budget to walking.

Consider effective allocation of this funding, including a considerable increase to the State Bicycle Fund (SBF); an essential funding source to assist local councils implement their Local Bike Plans. Funding was reduced in the 2018/19 budget to approximately \$300,000 to share between 68 local councils.

As already raised, the State Government could also create an “Active Transport Density Fund”; a fund available to councils (that are expected to increase densities) to assist them to build quality walking and cycling networks including to public transportation.

Infrastructure SA should also consider a comprehensive bicycle network as a major project and thoroughly assess its economic benefits (including social and environmental factors) in a true cost to benefit analysis.

Are funds from the Basic and General Infrastructure Schemes able to deliver active transport infrastructure?

Problems with SA transport planning: ITLUB

The Solutions and Actions set out in the Background Paper (p. 75) show the State’s significant allocation of funding on road infrastructure while the transport modes necessary to support density have a generic statement “Enabling cycling and walking as more sustainable and healthy travel choices” with no listed projects. Our state transport plans need re-thinking to support growing urban densities. Significant funding is required to develop a high quality direct, efficient, and pleasant cycling network for anyone aged 8 – 8 years and ITLUB must set out cycling projects to achieve this.

Review process

It is important that a review process is established to support the new Code. The review process would:

- Investigate the quality of the development delivered for communities.
- Investigate which sections of the Code are enforced through the planning process and delivered by the developers, including those relating to walking and cycling. Is bicycle parking being delivered at the set rates? Does it meet the Australian standards? Was quality end of trip showering facilities delivered? Comparatively, how much vehicle parking was delivered?
- From the review, what Code requires changing to better support integrated movement systems and quality infill development? What process will allow these changes to easily occur?

It is time to inform, educate and inspire the community about the way their lives will improve with better walking, cycling and public transport infrastructure. They want change. Families want to see their children grow up healthy and happy, on streets that allow them to participate. The planning system is partly responsible for leading SUPPLY orientated motor vehicle dominance and has the responsibility to reverse this impact. The new planning code could help with this change, but the policy directions set out, we believe, are inadequate, as they again do not actively state the necessity to prioritise walking, cycling and public transport. The levers necessary to drive change are also missing – planning and funding. South Australians want and deserve better. You can't go about business as usual and expect different policy outcomes.

References

1. <http://www.mdpi.com/1660-4601/15/5/962/htm>