The South Australian Active Living Coalition

submission to

SOUTH AUSTRALIA'S STATE PLANNING COMMISSION

Planning and design codes: Integrated Movement Systems

https://www.saplanningportal.sa.gov.au/planning_reforms/new_planning_tools/planning_and_design_code

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The South Australian Active Living Coalition

The Heart Foundation has been leading the South Australian Active Living Coalition (the Coalition) since 2007.

The Coalition is a collaboration between key Government and non-Government organisations. The purpose is to advocate for and support the integration of active living principles into the built environment.

Active living is defined as a way of life that integrates physical activity into daily routines. Our current patterns of living, that rely less on local facilities and opportunities and more on dispersed and distant centres of work, education, shopping and recreation have led to a reduction in opportunities to be physically active in daily life and have contributed to increasingly sedentary lifestyles.

The Coalition members supporting this submission includes: Heart Foundation, PIA SA, RAA, Bike SA, Parks and Leisure, AILA, GTA Consultants, Active Ageing, Walking SA, SA Health, ORS, DENR, Renewal SA, Office for the Ageing, Uni SA.

Our vision

Our vision is for the South Australian Planning System to make a significant contribution to improving health and wellbeing by delivering built environments that support active living, healthy lifestyles and connected communities. This vision is supported by over 20 years of compelling evidence that says the **built environments directly influences the health and wellbeing** of our communities.

This is supported by the South Australian Government's planning principles which state that:

> "…neighbourhoods and regions should be planned, designed and developed to support active and healthy lifestyles and to cater for a diverse range of cultural and social activities…"[i]
>
> *Planning, Development and Infrastructure Act 2016. Government of South Australia.*

Executive Summary

Thank you for the opportunity to comment on the Integrated Movement Systems Discussion paper which will feed into the new South Australian Planning and Design Code.

It is the view of the Coalition that the success of the new Code partly depends on supporting streetscapes and the public realm to be attractive, safe and 'walkable' for everyone, while making car travel less attractive as a mode of travel.

This travel mode change should:

- Reduce the impact from: population growth, extra dwellings and the extra cars this will bring;
- Improve amenity and opportunity for socialisation and safety;
- Promote usage of public transport.

The design and scale of new buildings will also affect community acceptance of the new Code and infill development more generally. It is important that infill bring benefit to the existing community and not perceived solely as negatively impacting views, amenity, property values and traffic.

Opportunities for improvement.

- Changes to zoning should be carefully considered with the first priority going to areas adjacent fixed rail or roads with relatively lower traffic volumes that have frequent public transport.
- Roads that must stay focused on transport and have high vehicle numbers (especially from diesel vehicles) should remain prioritised for transport, commercial and other development less sensitive to noise.
- Major transport hubs must have adequate facilities for waiting passengers, and those arriving via walking or cycling.

The existing **Transport and Access SAPPL module** can be updated to provide additional support for improved streetscapes and promotion of active travel:

- Route mapping and the incorporation of existing cycling and walking routes support assessment of the current PDC's for planners; and can channel limited funds for streetscape features to where it is needed most;

- Requirements for continuous accessible paths of travel, landscaping, seating and shade can be incorporated now and do not have to wait for proposed future design guidelines. Open car parks have landscaping requirements and similar requirements for streets should be considered.

Individual buildings can support quality of life for residents, active travel and assist with streetscape improvements. The modules being proposed to be migrated over into the new Code include several focusing on higher density housing within transit areas. The Coalition suggests:

- Designing with consideration of an ageing population
- Developing a Code that enables the development of housing stock that has the attributes that people want and need for a sustainable future.

THEME 1: Aligning South Australia's growth with transport infrastructure

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

The Coalition provides the following ideas for this theme to be considered and developed further in a response to DPTI as part of their consultation process.

We support the recent announcement by the Minister for Transport and Infrastructure which indicates the Government are considering broad options such as ride sharing and autonomous vehicle operation to address, in particular, the 'last mile' issues between fixed public transport infrastructure and residential destinations.

Need to classify public transport services.

- Not all public transport corridors are the same and have different attributes to attract and support land use change.
- It is suggested that public transport corridors be classified by service frequency, number of bus routes if a bus corridor, stop or station spacing and level of accessibility to the stops or stations. This applies to railway lines, the O-Bahn and arterial roads that are used by "trunk" bus routes.
- The three general classifications proposed are:
    - Priority public transport corridors for the trunk bus routes, tram lines and railway lines
    - Regular transit services for the base bus network to provide the service coverage to the land uses beyond 800 m of a high frequency bus stop or train station
    - Tailored services to meet the peak period and special events demand requirements.

Need to develop of a strategic Park and Ride policy to suit the adjacent land use.

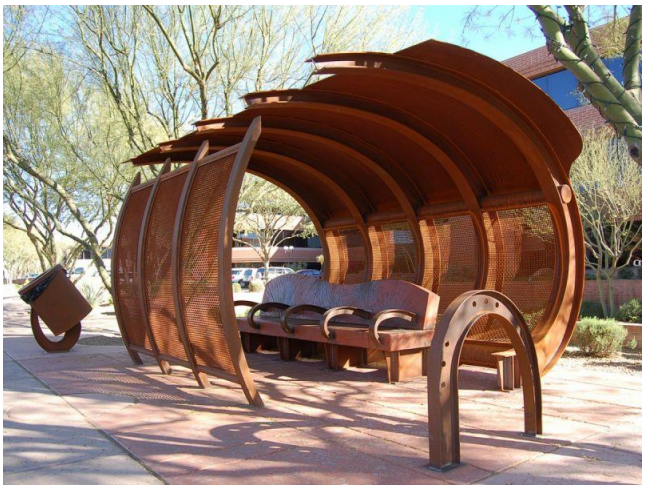
- A consistent Park and Ride location policy would guide where more Park and Ride car spaces should be provided in agreeance with local government.
- There is an inherent conflict between the State government encouraging people to catch public transport, acknowledging that fixed rail services are more popular than buses and will attract people from outside a convenient walking/cycling distance, and hence create a demand for carparking.
- Experience has shown that along popular routes such as the O-Bahn and Glenelg Tram, demand for carparking can readily exceed capacity, impacting on nearby residential streets and business parking. Local government then intervenes to restrict parking which either pushes the problem elsewhere or discourages PT use and encourages car commuting.
- Carparking demand needs to be anticipated and catered for so that that people who use a car as part of the PT journey are directed to appropriate Park and Ride facilities or carparking enhanced wherever this is possible without impacting the local surrounds.
- Consideration of which stops may be able to share parking with compatible adjacent uses (eg the sharing of parking with the Entertainment Centre) should be identified along with stops which may be able to re-designed to accommodate more parking for commuters within walking distance of the stop.
- The proposed approach in this discussion paper of initiating higher density housing around fixed rail stops with reduced resident and visitor parking is likely to exacerbate this problem.
- Within the walking/cycling catchment of a stop a quality, connected streetscape is crucial to promoting active travel and reduce reliance on private vehicles by nearby residents to meet the 'last mile' requirements by driving a short distance and parking at a stop.

Placemaking has a role at all public transport stops, stations and interchanges.

- Every public transport stop, station and interchange should be integrated with the adjacent land use and built form to be tailored to suit the level of pedestrian and passenger activity
- For example, universities, hospitals and medical facilities are in particular need of shelter and seating
- Bus stops in infill locations could be developed at parks and retail areas where larger numbers of waiting passengers would likely congregate with excellent facilities to reinforce public transport as a desirable mode of transport.
- Current issues around cycle parking must be addressed to help reverse the current decline in cycling for transport.

An example highlighted by our members is that of the new Royal Adelaide Hospital. The new hospital site on North Terrace is considered poor in this regard because there is very limited shelter and seating at the bus stops to meet the likely high demand, particularly by those who may have been ill, are elderly. Members feel that as summer approaches that extra steps should be taken to provide adequate shade. This development would have assessed presumably against the current SAPPL modules and yet has slipped through. It is felt that new developments should not replicate this design fault.

Examples from around the world of placemaking in transport stops



Public art at a bus interchange in Edmonton, Canada

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

Dwellings which reflect buyer need. The focus of much of the policy language is on achieving 'efficiencies' and new residents utilising public transport. However, a first step is attracting new residents with housing and public realm that people want to buy into. While we are aware of DPTI research into what people, especially older people, are looking for in a dwelling – we would also suggest use of the SA Health *Age-friendly Living Guidelines for Residential Development*.[ii] The Guidelines provide the criteria for 'Movement networks that promote safe walking and cycling' around footpaths, cycle paths, speed restriction, infrastructure and safe crossings. In addition the Code should allow for aged-care accommodation to be co-located with mixed-use centres to give older residents easier access to services.

There is a question over whether the SAPPL modules are adequate to deliver housing that reflects both the needs of the ageing population but also what they aspire to buy or rent – noting the growing proportion of retirees that will be living in rental housing. There may be a necessity to add or alter the current policy provisions to facilitate good quality development which will drive density by providing potential buyers and renters with their needs and aspirations.

Dwellings must have a realistic amount of parking provided. It is very important that those buying into dwellings with limited or no provision for off-street parking understand and are realistic about their own parking demands and the demands of their visitors and service providers. A resident living close to quality public transport does not automatically reduce their vehicle miles. A poor outcome arises when people retain their vehicles(s) when moving to such developments only to find that the parking is either unavailable on the site or is too small for their current vehicle. In such situations history of higher density development in Adelaide shows the adjacent council streets then become the default long term residential car parks which can cause access issues along the street, restrict access to adjacent properties and hamper waste collection services.

Resistance to a dense urban form as infill is a perceived necessity for tall buildings, which can trigger objections and resentment due to concerns of overshadowing, privacy, reduction in local property values, and generation of traffic. The Coalition acknowledges the excellent DPTI residential density guidelines[iii] – now twelve years old – which shows higher densities can be achieved (such as in parts of Adelaide's CBD) a relatively low rise setting. One argument for achieving higher density through lower and mid-rise built form is supported by a recent evidence review[iv] which suggested that development up to approximately six-storeys creates a compact urban form that is walkable, yet retains a human scale - which is important in terms of creating a pleasant, convivial, vibrant and walkable environment. The Coalition believes that policy provisions which support the provision of appropriate and desirable dwellings, located in a walkable environment close to key services is crucial to success. More specific comments regarding policy provisions are included under different sections below.

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?

Research into the impact of increasing density[v] showed that single changes to the built environment, such as simply zoning for higher residential densities, will not automatically reduce car use and increase walking by those who live there unless a number of other factors are present. The walkable quality of the street environment is fundamental to the appeal of a neighbourhood and in theory, this should help reduce extra car journeys generated by the extra dwellings and residents.

There is strong evidence that the aesthetic presentation of streets promotes active transport and recreational walking, particularly for adults and older adults[vi]. **Much of the potential of the Code and the changes to the planning system more broadly will be unmet if re-zoned areas are not designed, constructed or retrofitted to support a pleasant walking and cycling environment at the street level and reduce traffic.**

However the **Transport and Access module** as written in the current SAPPL seems limited in its ability to deliver a public realm consistent with best practice for higher density development.

The Transport and Access module has the Objective of

> *4. Provision of safe, pleasant, accessible integrated and permeable pedestrian and cycling networks that are connected to the public transport network*

But under the Principles of Development Control (PDC's) there is very little to guide a planner in the assessment of street design/the public realm apart from some generic words at:

- (15) *Development should ensure that a permeable street and path network is established that encourages walking and cycling through the provision of **safe**, **convenient** and **attractive** routes with connections to adjoining streets, paths, open spaces, schools, pedestrian crossing points on arterial roads, public and community transport stops and activity centres;* and
- (21) as a requirement *Pedestrian and cycling facilities and networks should be designed and provided in accordance with relevant provisions of the Australian Standards and Austroads Guides*

The current module as written appears to:

- leave widely open to interpretation as to what a safe convenient and attractive route is,
- leave open to interpretation as to whether connections are being made to community destinations such as retail, aged care, medical, schooling or community facilities.
- defer street design issues to the Austroads guides. Although they Austroads guides are excellent in the areas they do cover many aspects are missing from the perspective of walking particularly. Although the guides discuss separated/shared use path requirements, they do not cover requirements for seating and landscaping from a pedestrian perspective or specific universal design features that would support an 'age-friendly environment'
- There appears to be no leeway for the developer to use other street design guidance in order to use Movement/Link and Place type classification or shared/complete street arrangements;
- remove any requirement to continue any bicycle or pedestrian specific treatments, only to 'not compromise' existing designated bicycle routes. We are seeing a decline in cycling as a means of transport and this will only be effectively addressed by providing suitable continuous cycling infrastructure that improves safety by minimising interaction with traffic where practicable.
- Has no requirements for landscaping in the public realm.

However the requirements for a pedestrian and cycle friendly environment have been well documented and can be better codified in the Code to reduce uncertainty.

Landscaping and Streetscapes

The aim of enhancing perceived quality of higher density development and minimising impacts such as extra traffic from more residences rests in making the surrounding public realm pleasant and 'walkable'.

Design features to ensure streets are attractive, convenient, functional, comfortable and safe include:

- Quality well-maintained footpaths
- Shade and plantings
- Safe crossings
- Seating
- Signage
- Lighting and other CPTED considerations
- Drinking fountains and dog-walking infrastructure

Currently the Transport and Access module mandates landscaping in car parks but not streets.

Transport and Access: Vehicle Parking
34(j) Vehicle parking areas will provide landscaping that will shade and enhance the appearance of vehicle parking areas
38 to assist with stormwater detention and reduce heat loads in summer, outdoor vehicle parking areas should include landscaping at the rate of X square metres for every X square metres of hard surface

The Coalition queries whether if landscaping of vehicle parking can be specified in the Transport and Access module, can the cycling and walking section also include requirements for landscaping and shade?

Other SAPPL modules. The current SAPPL module for **land division** does further mention roads and access including:
14 *Road reserves should be of a width and alignment that **can**:*
(b) provide for footpaths, cycle lanes and shared-use paths for the safety and convenience of residents and visitors
(d) accommodate street tree planting, landscaping and street furniture

However the requirement is only to have the width and alignment at land division stage, not to ensure that any of the above public realm features are delivered.

15 The design of the land division should facilitate the most direct route to local facilities for pedestrians and cyclists and enable footpaths, cycle lanes and shared-use paths to be provided of a safe and suitable width and reasonable longitudinal gradient
Currently there is no requirement to have mapped the pedestrian and cycle routes so that the planner doing the assessment can ascertain whether any new proposed routes meet and complement existing routes.

In conclusion. The Transport and Access module has vague criteria for assessing aspects critical to promoting active travel such as route planning and street scapes. The Austroads guides for cycling and walking relate to the construction and appropriate widths of separated or shared pedestrian/cycle paths and Part 6B does relate to landscaping but the guide is written from the perspective of driver interest and driver safety.

The Coalition believes there is room for more specific guidance around standards expected for street design from the current 'safe, convenient and attractive' route requirement.

Recommendations for consideration.
Since 2004 the Heart Foundation has published guidelines which provide specific guidance to designers and policy makers with regards to the above principles. In 2012 the Heart Foundation published *Healthy by Design SA* which provides further specific guidance with regards to South Australia's regulatory framework. In the Matrix of Design Considerations[vii] (p45-49) specific guidance for a health promoting streetscape environment is provided with regards to:

- Shade
- Crime Prevention Through Environmental Design
- Accessibility
- Road User Safety
- Age-Friendly
- Child/Youth Friendly
- Pet Friendly
- Water-sensitive urban design

A copy of the design matrix has been included and more information can be found at https://www.healthybydesignsa.com.au/

With regards to transportation and access some additional requirements should be considered for the new Code to ensure there is consistency in how walking and cycling routes are demonstrated, assessed and provided for: Some elements that can be considered include:

A clause integrating route planning. A clause that could be developed that requires the developer to check any walking and cycling routes identified at Table X – including BikeDirect cycle routes. This was raised as part of Integrated Movement Systems Background paper (p40) but could also include cycling and walking priority routes identified by the local authority. **The Coalition strongly supports the inclusion of existing and future cycling routes via a spatial map and would welcome key routes for walking being identified in mapping also**. This would assist both the developer and assessing town planner:

- consider whether walkability thresholds for access to services and green spaces for households are being met – does anything need to be re-arranged?
- identify if existing objective and PDC's of the Transport and Access or Land division modules such as '*facilitate the most direct route to local facilities for pedestrians and cyclists'* and *'provision of safe, convenient and attractive routes'* is being demonstrated in the proposed plans
- prioritise where perhaps limited funds can be channelled towards urban design to the streets and places most likely to be used by pedestrians/cyclists particularly vulnerable users

Figure 1 Example of route mapping for walking – City of Unley

Improve requirements for new streetscapes.

Some suggestions for integrating into the Transport and Access module are:

- Provide **continuous accessible paths of travel** with safe crossings to neighbourhood destinations. Footpaths need to be of sufficient width to be navigable by pedestrians, those using mobility scooters, prams and cyclists. Pinch points need to be carefully assessed such as adjacent trees, lighting columns, street signs, fire hydrants, electricity cubicles and ramps.
- **Shade**; broad canopy trees to be provided over footpaths and cycle routes and shading of public transport stops
- **Seating** with backs and arms located in parks, destinations and along key pedestrian routes
- **Lighting**; ensure lighting meets needs of pedestrians and cyclists especially at crossings and public transport stops
- **Signage** – provide clear orientation to places of interest for walkers and cyclists. Include universal design principles.
- **Footpaths** wide enough for the expected pedestrian demand and cater for a range of users including wheelchairs and gophers (refer Austroads).
- **Public transport** stops and taxi ranks are clearly visible from surrounding development and new stops are co-located with shops and other facilities and are constructed with shelter and seating
- Refer to **Crime Prevention through Environmental Design** – cross reference if a CPTED module is being considered for the Code?

The Integrated Movement Systems Background Paper (p41) highlights that the Planning, Development and Infrastructure Act 2016 enables the State Planning Commission to prepare design standards relating to the public realm and infrastructure. However there does not appear to be any reason why requirements for the public realm to have continuous accessible paths of travel and shade as a basic requirement, alongside seating and shelter at appropriate destinations can't be more explicitly required by the Code.

Clarify when Link and Place methodology in addition to/alongside Austroads standards can be used. The Integrated Movement Systems Background paper (p10) discusses using the 'Link and Place' (also called Movement and Place) methodology and notes that '*this will be an important consideration of our new planning system'* but it is not clear if/when this will be allowed for under the Code. Should it be in the Transport and Access module?

THEME 2: Capitalising on strategic transport infrastructure

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

The Coalition supports prioritising increasing density along electrified fixed rail and more minor roads with frequent public transport in preference to busy arterial roads needed to protect freight routes. This is supported by research highlighting the potential negative health and amenity effects of air pollution and noise from motor vehicles. The Coalition recognises that zoning changes to allow greater density of development alongside some sections of fixed rail has been occurring since the last iteration of the 30 Year Plan for Greater Adelaide.

Previous recommendations of the South Australian Government[viii] alongside research commissioned for the Heart Foundation[ix] suggests that if an area of high traffic volume is to be re-zoned;

- Avoid zoning for residential and other noise sensitive development alongside major intersections. Reducing exposure to areas where diesel engines are idling would reduce some of the impact of noise and pollution on residents, commercial and retail zoning in these areas is more appropriate.
- ensuring that prevailing winds are considered at the design stage to avoid creating features that capture and concentrate air pollutants
- exploring options to reduce potential impacts of poor air quality, for example establishing buffers such as commercial premises closer to, and dwellings further from, sources of poor air quality; and locating air conditioning intakes away from sources of poor air quality
- The design of the street is considered for mitigation such as
    - Minimising stop-start movement to avoid the extra pollution from acceleration
    - Planting of trees and greenery to reduce mental fatigue associated with noise and there may be some species that can help remove some level of air-borne pollutants.

The Coalition notes the development and publication of the Noise and Air Emissions Overlay, Minister's Specification SA 78B – *Construction Requirements for the Control of External Sound* and associated guidelines *Reducing noise and air impacts from road, rail and mixed land use — A guide for builders, designers and the community*. However these guidelines apply to individual development proposals and do not address whether land is appropriately located for noise sensitive development to start with.

If more housing and noise sensitive development is allowed for in a Noise and Air Emissions Overlay area, there may need to be greater education for developers (especially 'mum and dad' developers) as to the existence of the Minister's Specification, the requirements of the Specification, and it must be enforced.

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

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

Please see above for how the Coalition propose the current **Transport and Access** module could be improved to promote cycling, walking and other forms of active travel.

Individual development – particularly larger buildings have opportunities to promote active travel and contribute to high amenity streetscapes. Several of the zones which focus on delivering or integrating housing and movement routes (as described by the Integrated Movement Systems Background Paper) have aspects which could be re-considered to promote active living and healthy lifestyles including:

- Private open space
- Fencing
- Further integration of Crime Prevention Through Environmental Design (CPTED) principles
- Shelter for pedestrians through awnings, balconies and landscaping
- Provision for pedestrian connections through high density developments

The Coalition notes that the existing character statements generally aspire to high amenity tree-lined streetscapes however there are no requirements for landscaping as part of the proposed housing related modules necessitating its inclusion in the transport and access module if that vision is to be realised.

Detailed comments are below.

Residential High-Density Zone

PDC 14 allows for no provision of private open space for studio apartments. For other apartments there is a private open space square metre requirement but with no minimum width. There is also the possibility to reduce even the small proposed areas if the housing is to be 'affordable housing'. Balconies and terraces (on a ground floor) allow space for access for fresh air and greenery, ability to entertain guests, children to play (in a limited fashion) supervised outdoors, and the opportunity for pet ownership. Our argument is that a minimum private open space provision is necessary (except in limited circumstances) and of a suitable width so that it is useable and can accommodate outdoor furniture.

This is consistent with a number of contemporary guidelines for apartment design in Australia:

- **South Australian Housing Authority** apartment design guidelines have minimum balcony sizes for all apartments including studios; with depths of 2m for studio and 1 bedroom apartments, and 2.4m minimums for 2 bedrooms and above.
- **NSW Apartment Design Guide** requires all apartments to have primary balconies with 4m2 provided for a studio apartment. Depths are a minimum of 2m for one and two bedroom apartments and 2.4m for 3 bedroom apartments. Areas less than 1m depth cannot be counted as a balcony. For apartments at ground level or on a podium, a private open space must have a minimum area of 15m2 and a minimum depth of 3m https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/apartment-design-guide-part-4-designing-the-building-2015-07.ashx?la=en
- There are some exceptions for high wind speeds above 10 storeys, close proximity to noise sources or adaptive re-use of heritage buildings; but in these instances other amenities must be provided within the apartments, the development or both. Access should be from a main living area wherever possible

- The **Apartment Design Guidelines for Victoria** have similar standards (see figure 1 below) with the additional provision that if a cooling or heating unit is located on a balcony then an additional area of 1.5 square metres is to be provided.

Figure 1

Table D5 Balcony size

Dwelling type	Minimum area	Minimum dimension
Studio or 1 bedroom dwelling	8 square metres	1.8 metres
2 bedroom dwelling	8 square metres	2 metres
3 or more bedroom dwelling	12 square metres	2.4 metres

Apartment Design Guidelines for Victoria (August 2017)

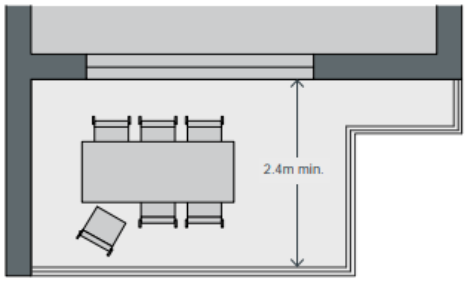


Figure 4E.3 Minimum balcony depths ensure that the balcony area is useable and can be easily accessed

Figure 4E.6 For one and two bedroom apartments, balconies should be at least 2m deep to allow enough space for a small table

Studio apartments, especially those in the 'affordable' category are likely to be marketed to students or created for single people on low incomes. A lack of private open space then has a resident relying on communal open space (if it's provided) or public space for outdoor entertaining, relaxation or recreation. While communal open space within a high density development gives residents the choice to interact with fellow residents and can allow for the building of community, not everyone will feel comfortable in this environment – particularly at night.

Consistent with this is experience gathered by the South Australian Housing Trust[x] (now Housing Authority) in previous medium and higher density developments for people on low incomes[xi]. Issues experienced with shared communal spaces included:

- Lack of definition of security in shared spaces
- Security fears in open lot carparks
- Sharing of foyers creating management issues
- Shared facilities such as laundries were not popular and proved to be difficult to manage and maintain (and are no longer promoted).

Based on this the Housing Authority has moved to provide all apartments with private open space and laundry facilities within bathroom areas.

The South Australian Government, when considering the impact of higher density housing on health has previously recommended that housing should be designed to provide fresh air, ventilation, natural light, acoustic privacy and useable private open space[xii]. *Dining and entertaining friends and family outdoors is a valued part of the Australian lifestyle and a well designed balcony can provide that space in lieu of a backyard*.

The South Australian Housing Authority has stated that *All housing should be managed in a way that does not preclude normal household or family living and functioning*[xiii]. The Coalition would argue that a resident being able to access fresh air or entertain a visitor in a safe, secure environment is important to mental health and social connectedness. The Coalition believes that unless high density housing is designated student housing with communal private open areas, or an adaptive heritage re-use project, there should be some private open space provided to every dwelling of useable dimensions.

Residential Regeneration Zone

- **Objective 5**: *Improved environmental outcomes*: It is unclear what this means or how the following PDC's would help drive it. Without corresponding improved streetscapes and urban greenery higher housing density can lead to the urban heat island effect which reduces the quality and experience of the public realm and to higher power bills.
- **Objective 2**: there is the potential to compromise the objective of 'improved quality of living environments' with some of the subsequent PDC's for affordable housing, particularly with regards to private open space if the requirement is set too low. Someone in an affordable dwelling still has needs with regards to greenery, fresh air and the ability to entertain guests on a small scale via a courtyard or balcony. Older people and women (who are a higher proportion of the elderly) and those on lower incomes generally feel more vulnerable in the public realm and are less likely to access public transport or use active transport options; especially after dark. They are more likely to desire a secure carpark attached to a dwelling, or in a group dwelling scenario, in an easily accessible, well lit and secure location.
- **PDC 3** It is unclear whether the PDC's requirements are an AND or OR requirement regarding a location suitable for higher density. The current PDC currently requires dwellings to be 'close' to public transport or major employment zones. Given the need for higher density housing to support walkable neighbourhoods, this style of housing should be within 400m of high frequency bus or 800m to fixed rail public transport. Locations further away from public transport are likely to entrench car dependency unless there is a corresponding large range of community facilities such as education, retail and health within the 400m/800m walkability catchments.
- Supports **PDC 13** that affordable housing should be distributed throughout the zone to avoid overconcentration of similar types of housing in a particular area

Urban Core Zone

The character statement should be amended to read '*up to* four storey townhouses/terraces/mews and residential flat buildings' as the current PDC 20 allows between 2 and 4 storeys in a Transition Area.

- **PDC 15**. It is not clear why development under 3 storeys (such as in a transition zone) should be allowed to block north light into adjacent properties? Or is the right to sunlight for 1-2 storey dwellings covered under a general residential module? It is difficult to assess without seeing the entire proposed new Code; but blocking access to sunlight to habitable rooms or solar systems for neighbouring development should not be considered a satisfactory outcome of a planning system.

- **PDC 17.** The current requirement is that masonry fences should be no more than 1.2m in height. It is not clear why masonry is specified rather than any solid material such as brick. Healthy by Design specifies that all solid fences should be no more than 1.2m height and or up to 1.8m high if at least 50% transparent. Should the current PDC be amended to require all front fences to be a maximum 1.2m with transparency encouraged? CPTED principles also discourage high fences backing onto public space, roads or parks; and fencing/walls kept low in places where sightlines, entry points to buildings and casual social interactions are desired.
- **PDC 19.** Side streets and rear lance access ways should also be designed to have passive surveillance, be well lit and incorporate other CPTED features.

Main Street Policy Area X

- **PDC 4.** Support the policy intent of pedestrian shelter and shade being provided
- **PDC 5** .Support the retention of display window or other glazing to maintain sightlines
- **PDC 6**. Support the finished floor level of the ground floor of the buildings level with the footpath. This is listed as an optional policy but should be considered as compulsory as a level floor entry is suitable for older people, children, mobility impaired and those with prams.

It could also be considered that a requirement for landscaping be added to the character statement and/or the PDC's, as this has been shown to be positive for business profitability[xiv] as well as supporting active living and the environment.

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?

Balance between Link and Place. It is important to ensure that the clear function of prospective development corridors are clearly established to avoid future tensions between completing requirements for residents, businesses and the transportation task. This is very important to ensure that the current and future transport demands on key corridors are not compromised by short and medium term planning decisions as an increase in road freight is predicted to meet changing consumer purchasing patterns.

The Dept for Planning, Transport and Infrastructures Functional Hierarchy document must therefore be referenced in any proposed development on a DPTI controlled corridor as should any council development plans that identify the function of key collector routes within their jurisdiction.

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

Please see previous comments.

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

Global trends in urbanisation and population ageing require the development of strategies to ensure our communities and environments remain accessible for people at every stage of their lives and especially as they grow older. In 2012 the Government of South Australia considered the requirements of ageing populations and published *South Australia's Communities for All: Our Age-friendly Future*[xv] to assist the public authorities and

the development industry in constructing age-friendly built environments. There are three age-friendly guidelines booklets in South Australia to ensure accessible and inclusive social and physical environments that enable opportunities for active citizenship, regardless of age and ability.

The guidelines reiterate that access to regular, safe, affordable and ability appropriate transport is a critical element in supporting older people to remain physically active and socially connected. Of particular note it is important to support people's ability to continue to live independently through accessing shops, medical and health facilities, other essential services and recreation and leisure opportunities.

As well as consideration of mobility scooters and access vehicles it is worth noting that older people walk more slowly so and so consideration of 'walkable' neighbourhoods requires closer proximity to facilities. Older people may need to take more rest stops, so an ageing population has extra requirements for seating, shade and continuous accessible paths of travel.

General considerations of particular importance to older populations:

- **Route mapping** would allow planners to assess key routes (e.g. around aged care facilities) that may require wider footpaths under Austroads standards to cater for streets likely to have higher levels of gophers and wheelchairs
- Older people can be more fearful in public realm so utilising **CPTED** is important. Buildings and streets provide good passive surveillance of off-street car parking areas
- As mentioned earlier provide **continuous accessible paths of travel** with safe crossings to neighbourhood destinations. Footpaths need to be of sufficient width to be navigable by pedestrians, those using mobility scooters, prams and cyclists. Pinch points need to be carefully assessed such as adjacent trees, lighting columns, street signs, fire hydrants, electricity cubicles and ramps as these can particularly affect those with wheelchairs and mobility scooters.
- Large and clear **signage** is provided in predictable locations. Signage should include information in tactile and Braille forms. Public transport stops with information that doesn't require use of a smartphone.
- Appropriate and well-located on and off-street parking is provided to meet the needs of the entire community, including visitors and alternative forms of mobility (e.g. gophers).
- Pedestrian safety and 'way finding' is supported through: pedestrian activated lights with longer crossing times; tactile and audio indicators; changes in pavement texture and luminance contrast; island refuges with tactile indicators.
- Public and private spaces, such as parks and local shopping centres, are designed to be attractive, safe and convenient. Infrastructure, such as seating, shade, bins, water fountains and **toilets**, is provided to encourage people to utilise such spaces. All outdoor seats in public areas include backrests and armrests.
- Rest areas and seating do not interfere with flow of pedestrian or cycle traffic and should be set back at least 1800mm from the building or property line (where a straight building line provides guidance for pedestrians with low vision).

General feedback questions

Are there any other key opportunities and challenges that you think the Code should respond to?

Education. Schools are large trip generators including active modes of travel. Despite the desired shift to infill development, new schools are still being built in greenfield sites in this state. There does not appear to be a clear and consistent state position on spatial planning for new schools - whether they be private or public. This is different to Victoria where school location is guided by state government planning policy, and Western Australia which has extensive content on school location and design to promote walkable neighbourhoods; for example, Element 8 – Schools in the WA Liveable Neighbourhoods Guidelines.[xvi] This issue could be addressed as part of the forthcoming *People and Neighbourhoods Discussion Paper*.

Car Parking: The Coalition 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.

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