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Sally Smith
General Manager, Planning and Development
Department for Planning Transport and Infrastructure

3rd December 2018

RE: INTEGRATED MOVEMENT SYSTEMS POLICY PAPER

Dear Sally,

Thank you for providing the UDIA (SA) with the opportunity to comment on the Integrated Movement Systems discussion paper (IMS Paper) as part of the current planning reforms consultation process. The UDIA is a member-based organisation representing the urban development sector. Our members include developers, planners, surveyors, architects and many other representatives across the South Australian property industry.

Many of our members feel passionately about the potential of our State and have a very real understanding of the planning system. They recognize the importance of our State building the necessary movement systems to allow for growth and to maximise the capacity of the many industries that contribute to the economy.

We continue to appreciate the ongoing engagement with the UDIA on all elements of the planning reform process and hope our feedback is genuinely considered in the development of the policies and most importantly in the formation of the Planning and Design Code (PDC).

The UDIA understands that development integrated with transport can support coordinated growth and increase economic productivity. We also agree there is significant potential for the planning system to assist in the creation of more mixed-use precincts to further reduce the distance between work and home in appropriate circumstances.

The UDIA does however have some serious concerns over several statements within the IMS paper. To provide context and represent the strong message that our members are asking us to convey, we have made some introductory comments followed by more specific commentary which addresses the three themes raised in the paper.

A substantial part of the 30 Year Plan for Greater Adelaide is predicated on the integration between land-use planning and transport. It is based upon a number of philosophical and ideological assumptions around the shape of our city in the future.

While a number of these are very much universal and desirable characteristics of a city that would be attractive to many, they are a challenge to be translated into a city like Adelaide with all of its unique characteristics.

While the purpose of this submission is not to comment on the 30 Year Plan, it seems evident that this paper in particular goes to the strategy around the type of development that might be allowed to occur. This is particularly important because it impacts on housing affordability, choices for consumers and all of the necessary and important work that needs to occur in infrastructure planning to deliver it.

We are concerned that the paper selectively uses particular statistics to advance a case which is so very focused on a particular style for our city with transport as the fundamental plank for all of the reasons why this should be the case.

We appreciate that transport goes to the cost-of-living, the sustainability of our city, the health of our citizens and how attractive we are to interstate and overseas visitors, and that is why the UDIA would welcome a more evidence-based discussion on a number of different factors that go towards how development occurs and what's needed to promote good development in the future.

We are concerned that the selective use of a particular statistics in this report will be used as the basis for incorrect future decisions that shape our city. If it isn't done more thoroughly there is a real risk that the end outcome won't achieve the desired goals and will simultaneously impact on the ability for every South Australian to realize the dream of owning their own home.

More work needs to be done in relation to the intersection of land-use planning and the role of different modes of transport. The report articulates selective statistics to demonstrate how Adelaide is failing with respect to the use of public transport. For example, by quoting how South Australians utilise public transport, the closeness of public transport routes and parking in the CBD is meaningless without taking into account the different modes of public transport that are available and the frequency of service. Having an infrequent bus service with nothing more than the investment of a pole to create a bus stop is vastly different to an electrified high-speed rail service when making comparisons. There's also little consideration of the length of the journey and the comparative travel times to work for alternative methods such as motor vehicles. There also is an implicit assumption that to increase and promote the use of alternate transportation away from the motor vehicle will require denser living arrangements. While there is no doubt that the viability of public transport can be improved in this way, there shouldn't be only one consideration to the improved use of public transport.

Development which is further away from the CBD should not be criticized as leading to increased motor vehicle travel costs without acknowledging the absence of investment in public transport infrastructure to these areas. Through implementing express services and also the increased use of

mode sharing, this may allow those from outer areas to use public transport if they are given a choice. It is absolutely clear through the phenomenal use of Park and Ride facilities that patronage could be increased through strategic investment in this infrastructure rather than using the planning system to force people to rely less on their motor vehicles.

The other selective use of stats like the comparison of London density to Adelaide is totally nonsensical. The comparison used in isolation and without the consideration of affordability and land economics is of great concern to our members.

Other observations made by UDIA membership on each theme:

1. Aligning growth with transport infrastructure

The UDIA is concerned about the broad assumption made on page 18 which refers to “efficient urban form through improve use of existing infrastructure”. While there is no doubt the capacity to better utilise existing infrastructure, the UDIA contends that there is a significant work that needs to be done on the long-term capacity of this infrastructure as it relates to infill development.

We are acutely aware that all of the infrastructure being utilised for infill was built many decades ago and was never designed for the potential density that is being asserted in this paper. Major utilities are also constrained in capital investment as a result of the regulatory models the operate under.

If there are any lessons need to be learned from out eastern seaboard cities they are that the unplanned density in these areas will ultimately lead to the very real problems of those cities are now facing.

2. Capitalising on strategic transport infrastructure

The UDIA believes the requirements surrounding the Metro Adelaide Road Widening Plan should be reviewed. MARWP requirement applies is currently available only via contacting DPTI representatives directly – there is no online resource identifying these requirements (nor is it noted on certificates of title etc), which is inefficient and lacks transparency. This information could be incorporated into an overlay or similar within the Planning Code.

3. Sustainable mobility, car parking and the impact of technology

There is a very strong focus on fixed route transport systems with limited discussion on more dynamic transport models being the way forward. As mentioned earlier, there is little discussion about the current public transport offering and required investment and more of an emphasis on encouraging development areas adjacent to public transport corridors. In a fiscally constrained environment there needs better consideration on the if it fact this delivers either the optimum economic outcome or the optimum social outcome.

Our members have also noted that it would be beneficial to consider a pragmatic staged policy process. As an example, the paper notes a decline by younger people in gaining a driver’s licence

however it fails to note that 2018 was a record year for new passenger motor vehicle sales in SA (same in 2016 and 2017) so there isn't necessarily a positive correlation between driver's licence holder numbers and the number of vehicles which are either parked or on the road network. The staged process would provide a vision for say the next 30 years in 10-year blocks and provide a policy framework relevant to each block.

The UDIA looks forward to working with DPTI on the development of the new planning system and again appreciates the opportunity to respond.

Yours sincerely,

Pat Gerace
CHIEF EXECUTIVE