

"May sustainable transport systems be at the heart of Adelaide's success as a people-friendly and environmentally responsible city."

Expert panel for the Planning System Implementation Review
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15/12/2022

Planning System Implementation Review Car Parking policy in the Planning and Design Code

Introduction

Bike Adelaide is the leading voice engaging with the State Government and local governments on cycling for transport issues across Greater Adelaide on an ongoing basis. We are chiefly concerned with improving the safety and amenity of utility cycling in Adelaide, ensuring more people can cycle using infrastructure that is safe and supportive.

We write to you to express our views on transportation in the Planning and Design Code, framed in your review as Car Parking policy. Bike Adelaide asks that broader transportation issues are considered in your review including bicycle parking provisions. Please find below our responses to your Car Parking policy questions, into which we have integrated our broader transportation concerns and ideas.

1. What are the specific car parking challenges that you are experiencing in your locality? Is this street specific and if so, can you please advise what street and suburb.

Bike Adelaide has assessed on street car parking in residential streets in areas experiencing infill development (i.e. Campbelltown) and areas with minimal infill (i.e. Cumberland Park). This assessment deemed there was higher rates of on street car parking in Cumberland Park, for example Cumberland Avenue, despite these being homes on large blocks. **Bike Adelaide therefore challenges the narrative that infill development is creating "parking issues" and that increasing minimum requirements would address these issues.** The State government should also challenge this narrative. Rather it is an issue of excessive provision of free car parking driving car ownership rates upwards.

Research shows that provision of unlimited on-street parking increases private car ownership amongst people with off-street parking by about 9%

<https://www.tandfonline.com/doi/abs/10.1080/01944363.2013.790100>

It is clear that the ongoing provision of highly excessive free car parking, entrenched by minimum requirements in the planning system, continues to drive excessive car use across Greater Adelaide and high car ownership rates. Framing this issue as a Car Parking problem rather than a transport accessibility problem ensures Adelaide will continue to make the same transport mistakes it has for over 50 years.

The car parking background paper explains there is "...emerging thinking that providing car parking spaces encourages the choice to drive..." This has actually been known and discussed for decades (including in Adelaide) but ignored.

e.g. re: free commuter car parking:

1992: <https://www.sciencedirect.com/science/article/abs/pii/016604629290029Z>

2001: <https://journals.sagepub.com/doi/abs/10.3141/1753-05>

e.g. re: residential parking provided as part of development:

2009: <https://journals.sagepub.com/doi/abs/10.3141/2118-04>

2012: <https://www.sciencedirect.com/science/article/abs/pii/S0967070X11001028>

2016: <https://www.bloomberg.com/news/articles/2016-01-12/study-the-strongest-evidence-yet-that-abundant-parking-causes-more-driving>

2017: <https://www.sciencedirect.com/science/article/pii/S2352146517306737>

Bike Adelaide is concerned that bicycle parking has not been included as a part of the review. Below we briefly detail feedback on bicycle parking provisions in the Planning and Design Code. These have previously been expressed in detail.

Bike Adelaide members frequently express frustration at the inadequate or non-existent bicycle parking at new commercial premises and in new residential facilities. Bicycle parking is not required by the Planning and Design Code in many zones for many different development types including for residential flat buildings and commercial premises. This is truly outrageous. Regarding usability, security is paramount, as is easy accessibility and weather protection. The Planning and Design Code fails to reference user classes or design standards for bicycle parking. Functionality is also important but frequently bicycle parking provided is not fit for purpose. For example, fit for purpose cargo bike parking (usage by families in Adelaide is on the rise) is not provided or bicycle parking design only caters for a front wheel lock up which is unsafe.

Mandating bicycle parking at every commercial, residential and community development across Greater Adelaide is essential. Increasing the bicycle parking required is necessary. Providing specific cargo bicycle parking (easy turning angles to access, sufficient space including width and length) is important. The Planning and Design Code should recognise that every bicycle user is one less car to park.

We encourage the review panel to consider how car parking provisions, that enforce very high carparking rates and entrench car reliance, are a significant hinderance. Minimum car parking provisions, entrenched in the Planning and Design Code, restrict opportunities to create people friendly, local communities, supported by environmentally friendly and healthy transport options. This is occurring across Greater Adelaide. Lacking provisions for bicycle parking contribute to the problem.

2. Should car parking rates be spatially applied based on proximity to the CBD, employment centres and/or public transport corridors? If not, why not? If yes, how do you think this could be effectively applied?

Car parking rates should be spatially applied to understand that the majority of trips in Greater Adelaide are for short distances (under 5kms) and can be substituted (for most people with exceptions) for walking or cycling (range expanded by electric bicycles) including in existing lower density suburbs and townships. Bike Adelaide strongly contest the idea that car trips in Adelaide can only be substituted by public transport or that car parking provisions can only be reduced once density is increased.

For example, in the Gawler township all commercial activity is within a 7km circle that also includes all residential housing for local residents. Currently around 95% of those trips are taken by car as high volumes of free car parking is provided. This supply induced traffic congestion creates significant problems. Why would the Planning and Design Code continue to require such high car parking rates in areas where residents and commercial activity are spatially located close together? This applies across most Greater Adelaide suburbs.

Car parking rates should also be spatially applied based on proximity to dedicated cycling infrastructure including State priority cycleways. For example, commercial activity located close to the Outer Harbour Greenway, such as Queen Street Croydon. The Planning and Design Code should therefore define Separated Bikeways and Greenways as "Transport Corridors" suitable for spatially locating higher density zones and centres. A State Bike Plan overlay should map out these corridors.

Bike Adelaide supports reducing all minimum car parking requirements and spatially applying car parking rates based on proximity to residents and workers including in lower density suburban areas, and proximity to cycling infrastructure, as well as those suggested in the question.

3. Should the Planning and Design Code offer greater car parking rate dispensation based on proximity to public transport or employment centres? If not, why not? If yes, what level of dispensation do you think is appropriate?

The Planning and Design Code should reduce the minimum car parking requirements across Greater Adelaide and stop perpetuating car dependence at the expense of all other transport modes. The majority of trips in Greater Adelaide are less than 5kms and can already be substituted with walking or cycling. Car parking rates should be reduced for all development where people have the ability to walk and cycle, as well as when close to public transport or employment centres.

4. What are the implications of reviewing carparking rates against contemporary data (2021 Census and ABS data), with a focus on only meeting average expected demand rather than peak demand?

Bike Adelaide strongly supports a shift to reviewing car parking rates with the intention of reducing the number required by development type. Bike Adelaide supports a step away from meeting supply induced demand for car parking, particularly peak requirements.

Example why: a change of use to consulting rooms currently requires 4 car parks per consulting room. In reality this means that a 100m² development with three consulting rooms would require 12 car parks plus disability (a rate increased in the new code). This would require approximately 350 m² of car parking (at a minimum). It is impossible to create a people friendly city that encourages walking and cycling with this type of development (each building swimming in a sea of car parks). The 4 car parks per consulting room is a very rough tool when applied. For example, a GPs rooms and a psychologist's premises would require the same parking and yet have significantly different appointment times/visitor rates. This then requires a developer to pay significant money to a private traffic consultant to justify a lesser car parking amount, increasing development costs and creating an uneven playing field (if you can pay someone to say it is OK you can get away with it but if you can't afford it.....).

Bike Adelaide, based on global examples, believes reducing car parking requirements would have many significantly positive benefits by overcoming the significant issues the current peak demand car parking provisions create including:

Local neighbourhood living: Peak demand car parking requirements prevent the establishment of local neighbourhood commercial activities that often have limited land, are smaller in scale and are often looking to adapt existing buildings that don't have car parking. This further entrenches car reliance by pushing commercial activity further from people's homes. This also increases traffic volumes, perpetuating car reliance issues.

Heritage: Peak demand car parking provisions make it difficult to adapt heritage buildings to different commercial land uses, resulting in pressure to remove them.

Transport accessibility: Peak demand car parking ACTIVELY DISCOURAGES WALKING AND CYCLING BY MAKING IT EASY TO DRIVE. Research shows difficult parking encourages walking more than availability/condition of walking infrastructure or traffic volumes:

<https://www.sciencedirect.com/science/article/abs/pii/S0091743508001163>

Peak demand car parking infrastructure is poor for active transport: driveways are crash conflict zones (analysis of crash stats, bike crashes at driveways) prioritising traffic flow; gradients across footpaths are bad for people with disabilities; danger to pedestrians crossing large car parks. Car parking accessway provisions in the Planning and Design Code create significant hinderances to footpath connectivity and comfort

Peak demand car parking requirements also attract significant car volumes, contributing to traffic congestion. This supply induced traffic limits the perceived available space to deliver dedicated public transport and bicycle infrastructure on public roads. It also limits land and funds available to provide secure, undercover bicycle parking.

Development opportunity: Providing peak demand car parking rates is a costly exercise, both to secure the land and to build the infrastructure and associated storm water management systems. This limits what developers can afford

to construct for the community. For example, a 100m² heritage cottage in Gawler converted to consulting rooms required 300m² of car parking to meet the Planning and Design Codes requirements. The site is located perfectly in a commercial precinct on Main North Road in Willaston and has another 1500m² of land awaiting development but car parking rates make the cost too high for the current owners to proceed.

Climate change adaptation and mitigation/greening: Peak demand car parking requirements minimise the private land available for private open space to plant trees and create green canopy cover.

Density: Peak demand car parking requirements limit the density of housing and commercial activity, increasing costs and decreasing potential. It encourages inefficient development as the opportunity to have more people, fewer cars is not capitalised on

Peak demand car parking provisions prioritise car parking over all of the above, to the significant detriment of our community. Car parking provisions present a very real economic cost.

Alternative to support lower commercial car parking requirements - contribution fund cash-in-lieu: this method is not effective for building car parking stations, but could be used to encourage alternatives that reduce car use. For example, an “Active Transport Density Fund” would require a contribution from developers instead of providing expensive and excessive car parking. By establishing a framework to distribute the funds to Local Councils it could 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.

5. Is it still necessary for the Planning and Design Code to seek the provision of at least one (1) covered carpark when two (2) on-site car parks are required

No definitely not. Undercover car parks are used for storage, not car parking.

The Planning and Design Code should however seek the provision of secure bicycle storage for every residential building type in every zone. Garages are currently used for this purpose.

Another option to explore is to require enough space on-site for two parking spaces, but only require one actually allocated. This would leave it to the owner to build one if needed.

Alternatives to support lower residential car parking requirements:

- Providing residential parking away from residences (<https://www.sciencedirect.com/science/article/pii/S2352146517306737>)
- Apply parking limits to streets with infill development
- Introduce local car share – up to a third of users reduce car ownership in the year before joining a car share scheme; greatest impact when people changing (e.g. new house); more likely to use if have prior exposure to car share – all facilitated by having on-site car share <https://link.springer.com/article/10.1007/s11116-021-10184-6#Sec18> (also has refs for disbenefits of car use) includes discussion of peer-to-peer systems in middle suburbs vs fleet schemes in inner suburbs.

The Planning and Design Code should also offer the opportunity to “self-select” a low car lifestyle rather than apply a broad-brush approach. In particular, the number of motor vehicles per household is influenced by Age Structure and Household Type, which determine the number of adults present; access to Public Transport; distance to shops, services, employment and education; and Household Income. Car parking requirements don’t reflect this. These should be used to encourage self-selection of low-car householders to areas that support low-car lifestyles, e.g., as seen with the successful ‘nightingale’ developments in Bowden; but not in the Glenside development.

Greater Adl (2021 Census): <https://abs.gov.au/census/find-census-data/quickstats/2021/4GADE>

27.7% of households in Greater Adl had only one person. However, 3.5% of dwellings were 1 bedroom or less (bedsits, studios) and 18.7% two-bedroom (the average is 3-bedroom, comprising 51.3%). 36.7% have 1 registered car and 7.6% have none. The car parking requirement for two car spaces is probably an over-provision, based on issues arising with the broad-brush approach. E.g., two-bedroom apartments without good access to public transport, shops, employment etc and attracting certain types of households => higher car ownership => impacts on surrounding streets.

6. What are the implications of developing a design guidelines or fact sheet related to off-street car parking?

This would further entrench car parking provisions above infrastructure for alternative transport options and continue to promote car use as a central aspect of land use planning in South Australia.

Instead, develop an Accessibility Design Guideline which sets out how to provide safe and convenient bicycle and walking access, as well as secure and accessible bicycle parking, access to public transport, access to local bicycle routes and overall promotion of alternatives to car parking.

7. Electric vehicle (EV) charging stations are not specifically identified as a form of development in the Planning, Development and Infrastructure Act 2016. Should this change, or should the installation of EV charging stations remain unregulated, thereby allowing installation in any location?

They should remain unregulated.

8. If EV charging stations became a form a development, there are currently no dedicated policies within the Code that seek to guide the design of residential or commercial car parking arrangements in relation to EV charging infrastructure. Should dedicated policies be developed to guide the design of EV charging infrastructure?

No

9. What are the implications of car parking fund being used for projects other than centrally located car parking in Activity Centres (such as a retail precinct)?

Bike Adelaide encourages a shift from a car parking fund, which has proven difficult to implement, to an Active Transport investment fund or Transport Investment Fund.

Although a contribution fund cash-in-lieu method is not effective for building car parking stations it could be used to encourage alternatives that reduce car use. For example, an "Active Transport Density Fund" would require a contribution from developers instead of providing expensive and excessive car parking. By establishing a framework to distribute the funds to Local Councils it could 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. Local Councils are currently significantly underfunded to deliver better active transport infrastructure.

10. What types of projects and/or initiatives would you support the car parking funds being used for, if not only for the establishment of centrally located car parking?

This should not be called a Car Parking Fund but a Transport Investment Fund or Active Transport Density Fund. Bike Adelaide would support investment in infrastructure to promote alternative transport choices including: walking and cycling access to public transport, bikeways along roads and greenways, raised intersections, wombat and zebra crossings, shared use paths, arterial road pedestrian-actuated crossings, pedestrian and cycling overpasses, bicycle parking, better bus stops with shade and greening, electric bicycle subsidies, wayfinding signage for walking and cycle ways, reduced cost of public transport, better public transport provision.

11. Do you think there would be benefit from the State Planning Commission preparing local road Design Standards?

It is unclear for what purpose this is intended. Bike Adelaide would first like to see priority given to improving the Bicycle Parking provisions in the Code and reducing car parking requirements.

If the purpose is to provide better quality roads for walking and cycling there could be some benefit however it is difficult to see how you intend to enforce these.

If you were going to develop design standards for roads would this also include design standards for footpaths, bikeways etc?

Kind regards

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